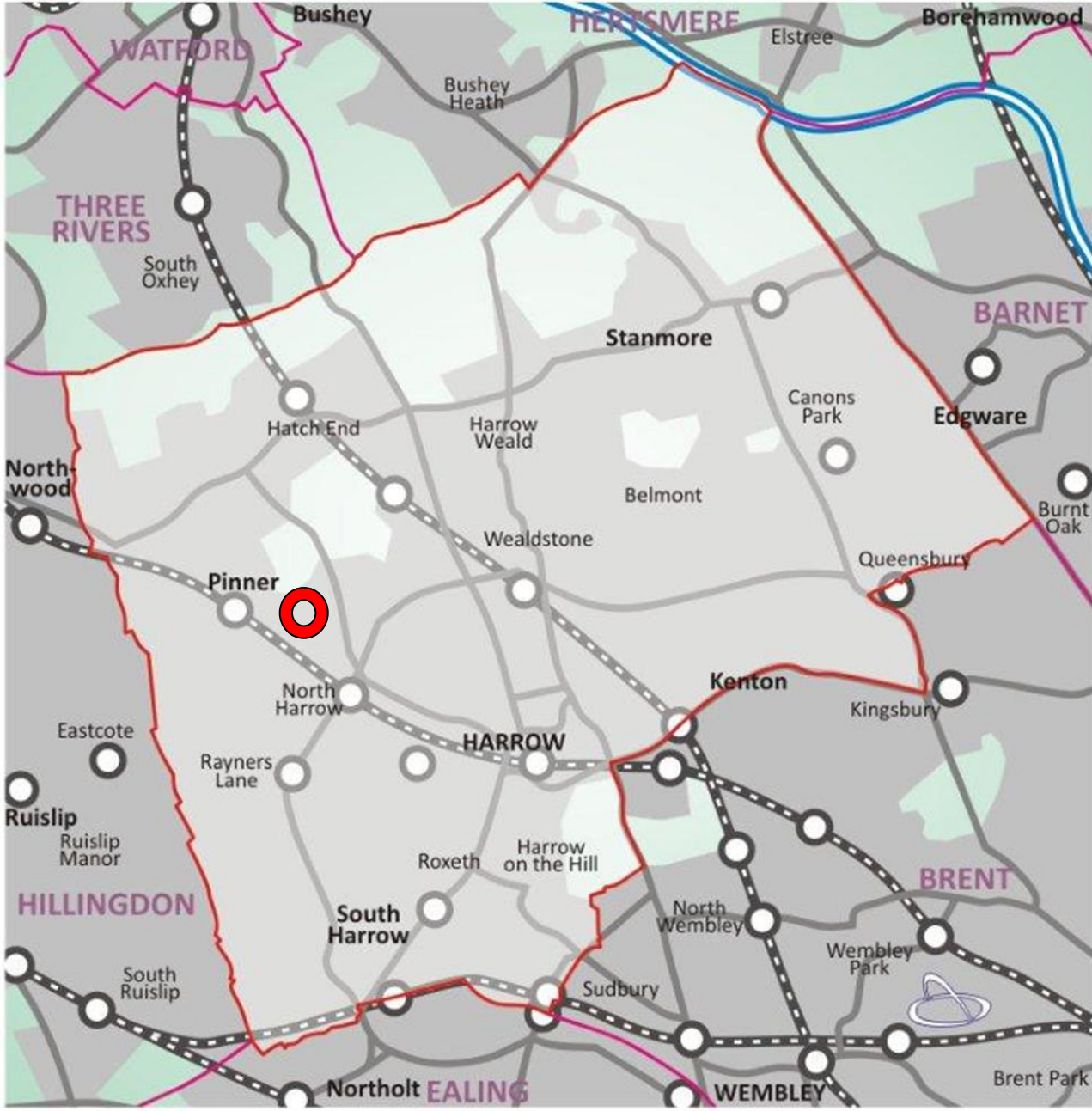
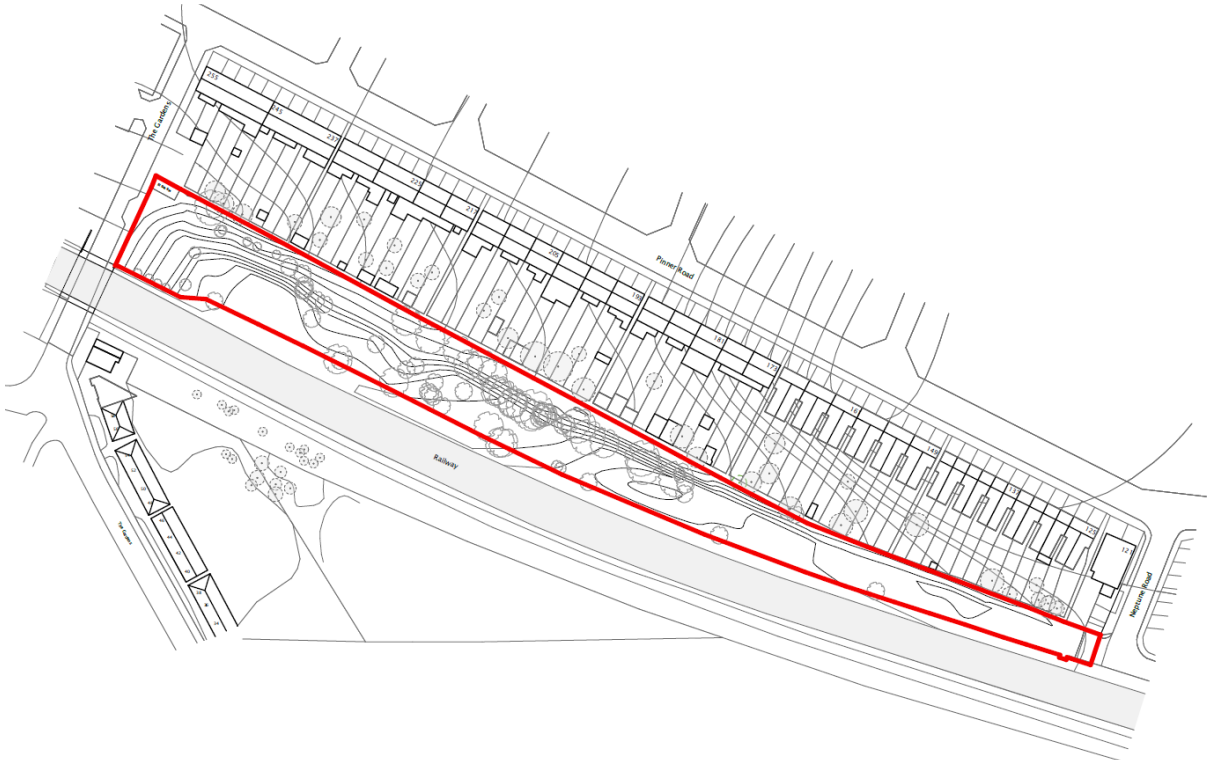


= application site



Land Rear Of 121 – 255 Pinner Road, Harrow	P/0669/23
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Location Plan



01

Location Plan

1:1250

LONDON BOROUGH OF HARROW

PLANNING COMMITTEE

22nd November 2023

APPLICATION NUMBER: P/0669/23
VALIDATION DATE: 03 MARCH 2023
LOCATION: LAND REAR OF 121 – 255 PINNER ROAD,
HARROW
WARD: HEADSTONE
POSTCODE: N/A
APPLICANT: MML INVESTMENTS LIMITED
AGENT: HGH CONSULTING
CASE OFFICER: KIMRY SCHLACTER
EXTENDED EXPIRY DATE: 31/01/2024

PROPOSAL

Development of three detached buildings comprising residential units (use class C3); New vehicle and pedestrian accesses and gates; Car parking; Cycle parking; Refuse stores; Soft and hard landscaping including amenity space; and associated ecological related works

Details: Height ranging from 2 - 4 storeys and comprising 37 residential units (22 x 1 Bed, 14 x 2 Bed & 1 x 3 Bed).

The Planning Committee is asked to consider the following recommendation:

RECOMMENDATION A

- 1) To agree the reasons for approval as set out in this report, and
- 2) Grant planning permission subject to authority being delegated to the Chief Planning Officer in consultation with the Director of Legal and Governance Services for the completion of the Section 106 legal agreement and other enabling legislation and issue of the planning permission and subject to minor amendments to the conditions (set out in Appendix 1 of this report) or the legal agreement. The Section 106 Agreement Heads of Terms would cover the following matters:

Early Stage review mechanism

- i) Early stage review of the development as per the Mayor's SPG.

Affordable Housing

- i) Provision of affordable housing comprising 10 no. units [comprising 5 x 2B4P (of 4 habitable rooms each), 1 x 3B5P (of 5 habitable rooms) and 1 x 1B2P (of 2 habitable rooms)] London Affordable Rent; and 3 x intermediate units of

- either London Shared Ownership or London Living Rent [comprised of 1 x 1B2P (of 2 habitable rooms) and 2 x 2B4P units (of 4 habitable rooms each)].
- ii) MML Investments Limited, or any sub lessee of MML Investments Limited, shall enter into a nominations agreement with the Council in order to ensure that suitable applicants from the Council's own waiting list can benefit from these proposals.
 - iii) 1x 2B4P and 1x1B2P of the London Affordable Rent units to be provided as fully wheelchair adapted units.

Employment and Training

- i) The developer to submit to the Council for approval, prior to commencement of the development, a Training and Recruitment Plan. The developer to implement the agreed Plan. The training and Employment plan will include:
 - a) employment initiatives opportunities relating to the construction of the Development and details of sector delivery;
 - b) the provision of appropriate training with the objectives of ensuring effective transition into work and sustainable job outcomes;
 - c) a target for the number of Apprenticeship, Work Experience and Progression Into Employment placements (as the case may be) and the percentage of local residents to be employed within the Development through local recruitment agencies or such other recruitment agencies or job centres as the Council acting reasonably considers appropriate
 - d) a target for the percentage of BAME workers and women workers to be employed within the Development through local recruitment agencies or such other recruitment agencies or job centres as the Council acting reasonably considers appropriate
 - c) the timings and arrangements for implementation of such initiatives and
 - d) suitable mechanisms for the monitoring of the effectiveness of such initiatives
- ii) A financial contribution towards the management and delivery of the construction training programme based on the construction value of the development. This is usually calculated using the formula: £2,500 per £1,000,000 build cost. (Estimated figure to TBC)
- iii) If targets set for delivery of any Apprenticeship, Progression Into Employment, Work Experience, etc. posts in the Approved Employment and Training Plan are not being met, the Owner shall submit for the Council's written approval remedial measures that would be put in place to meet the relevant targets. If the Owner fails to implement the remedial measures approved by the Council (or if the remedial measures prove to be ineffective), the Owner shall pay an Employment and Training Remedial Contribution to the Council.
- iv) The developer to use all reasonable endeavours to secure the use of local suppliers and apprentices during the construction of the development.

Highways Agreement

- i) Highways agreement for the undertaking of to add additional signage for the one-way operation of Neptune Road and construction of vehicular access.

- ii) Resident's permit restriction, and contribution of £1500 to amend the relevant traffic order.
- iii) Provision of one car club space.

Travel Plan

- i) Submission of a baseline survey following occupation (within 6 months or at 75% full, whichever is first)
- ii) Revised targets within an updated Travel Plan (as necessary) following the baseline survey, and monitoring over a 5-year period, to be submitted 1, 3 and 5 years after the baseline survey is submitted.
- iii) A travel plan bond of £10,000 will be required to secure the implementation of all measures specified in the revised Travel Plan. In addition a £5,000 monitoring fee is required to cover the cost of monitoring the travel plan. The developer to ensure the effective implementation, monitoring and management of the travel plan for the site.

Energy & Carbon Offset

- i) Prior to the commencement of the development, provision of carbon reduction on-site and payment of any offset if zero carbon reduction is not achieved on-site, as determined by the final carbon reduction achieved on site as per Condition (TBC) of this permission. Based on the submitted Energy Statement – this is currently estimated at a financial contribution of £4,894.00 towards carbon offsetting measures (£95 / tonne / year over 30 years, based on 1.7 tonnes to be off-set).
- ii) Requirement for final “as-built” Part L calculations of the Building Regulations to confirm the carbon reductions achieved on site and the final total remaining emissions to be offset through monetary contribution. This is to be submitted within one month of practical completion of the development, confirming the actual carbon emissions to be offset, with any shortfall to be paid through a further offset.

On-site and off-site Biodiversity Contribution

Off-site

- i) Contribution of £163,036.83 + VAT (adjusted at the point of application for inflation against June 2023 pricing) towards required off-site biodiversity mitigation and gain provision (including management, monitoring and reporting to be undertaken by the offset provider at requisite intervals) over a minimum period of 30 years, based on a full cost recovery price of c. £36k per biodiversity unit.

On-site

- ii) The developer, or any successor body to which responsibility for the site's management and onsite mitigation provision might in future be transferred (hereafter the responsible body) shall be responsible for fully funding and implementing monitoring of the on-site biodiversity deliverables over a period of at least 30 years following development completion.
- iii) A monitoring report (demonstrating an assessment of on-site provision against agreed milestone targets) shall be submitted to the local planning

- authority at 1, 2, 3 and 5 years after the development completion and at 5-yearly intervals thereafter.
- iv) In the event that a monitoring report or compliance checking by the local planning authority establishes that the on-site biodiversity value is not being achieved as agreed and approved in accordance with the grant of planning permission, or any parts of the biodiversity deliverables have failed then remedial action will be required.
 - v) Should remediation be necessary, the responsible body shall either (1) undertake such works as are required to bring the on-site biodiversity value in line with the agreed milestone targets within a 1-year period, or (2) pay (a) to the London Borough of Harrow a sum to provide such additional off-site contributions as will be required to meet the identified shortfall, based on a full cost recovery price of at the time of when the recovery payment is triggered (currently £36k per biodiversity unit) and (b) to the local planning authority a sum to cover any costs it faces in the preparation and/or approval of revisions to the on-site mitigation plan.
 - vi) Following any required remediation, the responsible body will undertake further monitoring and reporting, following the pattern identified above or as otherwise agreed in advance, in writing with the local planning authority, extending up to a period of 30 years from development completion plus the total period of years for which provision failed to meet targets over this period.
 - vii) Monitoring/management of badger sett, and obligation to retain the designated Badger Zone for habitat creation in perpetuity. No development shall take place within the designated Badger Zone without the express permission of the local planning authority.

Legal Costs and Monitoring Fees

- i) Legal Fees: Payment of Harrow Council's reasonable costs in the preparation of the legal agreement
- ii) Payment of Planning Administration Fee / section 106 monitoring fee upon completion of S106 agreement (final amount TBC)

RECOMMENDATION B

That if, by **31st January 2024** or such extended period as may be agreed in writing by the Chief Planning Officer, the section 106 Planning Obligation is not completed, then delegate the decision to the Chief Planning Officer to **REFUSE** planning permission for the following reason:

The proposed development, in the absence of a Legal Agreement to provide appropriate improvements, benefits and monitoring that directly relate to the development, would fail to adequately mitigate the impact of the development on the wider area and provide for necessary social, environmental and physical infrastructural improvements arising directly from the development, contrary to the National Planning Policy Framework (2023), policies D7, H5, H6, H7, E11, S4, G6, G7, SI 2, T4 and DF1 of The London Plan (2021), Affordable Housing & Viability SPG, Mayor of London (2017), Play and Informal Recreation, Mayor of London (2012), policy CS1 of the Core Strategy (2012), policies DM1, DM12, DM20, DM21, DM28, DM43, and DM50 of the

Harrow Development Management Policies Local Plan and the Supplementary Planning Document: Planning Obligations & Affordable Housing (2013).

REASON FOR THE RECOMMENDATIONS

The development of the site to provide three buildings, comprising 37 residential homes, new vehicle and pedestrian accessways, landscaping and ecological works including an artificial badger sett and off-site contributions, is sited in a sustainable location, and would bring forward housing provision of a satisfactory layout and design to ensure that the future occupiers would benefit from a high standard of living accommodation. It is considered that the proposed building would have an acceptable design and external appearance and would not have an undue impact on the character and appearance of the area or the residential amenity of neighbouring occupiers. The ecological mitigation measures have been scrutinised and are considered satisfactory, subject to conditions and S106 obligations. Accordingly, the development would accord with development plan policies and is recommended for approval.

Accordingly, weighing up the development plan policies and proposals, and other material considerations including comments received in response to notification and consultation as set out below, officers conclude that the application is worthy of support.

INFORMATION

This application is reported to Planning Committee as it proposes construction of more than three dwellings on the site, which is outside Part 1(b) of the Scheme of Delegation.

Statutory Return Type:	Major Development
Council Interest:	None
Net additional Floorspace:	2,916sqm
GLA Community Infrastructure Levy (CIL) Contribution (provisional):	£174,960
Local CIL requirement (Provisional):	£508,346.28

HUMAN RIGHTS ACT

The provisions of the Human Rights Act 1998 have been taken into account in the processing of the application and the preparation of this report.

EQUALITIES

In determining this planning application, the Council has regard to its equalities obligations including its obligations under section 149 of the Equality Act 2010.

For the purposes of this application there are no adverse equalities issues.

S17 CRIME & DISORDER ACT

Policy D11 of the London Plan (2021) and Policy DM1 of the Development Management Policies Local Plan require all new developments to have regard to safety and the measures to reduce crime in the design of development proposal. It is considered that the development does not adversely affect crime risk. However, a condition has been recommended for evidence of certification of Secure by Design Accreditation for the development to be submitted to and approved in writing by the Local Planning Authority before any part of the development is occupied or used.

1.0 SITE DESCRIPTION

- 1.1 The application site is a vacant parcel of land, approximately 0.75ha, sited between the rear of houses nos. 121-255 Pinner Road (to the north) and a railway track (to the south). The site is a former railway siding, of made ground, and with uneven ground sloping down towards the north, and variously towards the eastern and western access points; with the highest point along the boundary with the railway.
- 1.2 There is an existing access off Neptune Road, and the site also directly adjoins The Gardens.
- 1.3 The adjoining houses along 121-255 Pinner Road have a consistent character, formed of two-storey terraced housing, with relatively deep gardens (17-30m) at the rear. A pathway is indicated along the length of these gardens between the houses and the site, however in some areas this may not still be maintained.
- 1.4 Two-storey houses face the site along the opposite side of Neptune Road (nos. 7-14 Neptune Road), with industrial properties located to the rear of those.
- 1.5 A purpose-built block of flats (nos. 62-66 The Gardens) and an electrical substation adjoins the site to the north along The Gardens. On the opposite side of The Gardens are commercial properties.
- 1.6 The site is located within a PTAL 3 location, considered to be good in terms of public transport accessibility. West Harrow Station is located 300m from the site's proposed access to The Gardens, while North Harrow Station and the North Harrow local centre are 800-850m to the north-east and Harrow town centre is approximately 600m to the east, with Harrow on the Hill station 1km distant. Local shops and services, as well as bus services, are also available along the designated Neighbourhood Parade on Pinner Road (opposite 121-219). The site therefore has very good access to shops and services.
- 1.7 The site is not designated or protected green land, and does not form part of a wildlife or nature sanctuary. However, the site is home to a sett of badgers, which appear to have located on site circa 2019, and is comprised largely of self-seeded scrub and trees. TfL have rights over a strip of land up to 5m deep within the site, preventing any development within this buffer zone and ensuring that vegetation is controlled so as not to interfere with railway services. TfL does carry out cutting down of vegetation within this strip as needed.
- 1.8 Although not located within a critical drainage area or flood zone, areas of localised flooding have been identified around the site. The site is located within an RAF Northolt Safeguarding Zone.

2.0 PROPOSAL

- 2.1 It is proposed to develop the site to construct three detached buildings for residential (C3) use and an artificial badger sett and designated Badger Protection Zone (BPZ), along with vehicle and pedestrian access, an internal road, and landscaping.
- 2.2 The building heights would range from 2-4 storeys (a maximum of 13.8m for the tallest building when measured from the lowest ground level point). A total of 37 dwellings would be created, comprising 22 x 1 bed, 14 x 2 bed & 1 x 3 bed units. Of these, 10 units would comprise Affordable Housing (equating to 35.5% by habitable room). Ten percent (10%) of the units would be M4(3), i.e. wheelchair user dwellings.
- 2.3 Landscaping provided throughout the site, including communal amenity areas and children's play areas, in addition to private amenity spaces (balconies/terraces) for each unit.
- 2.4 An artificial badger sett would be created at the western end of the site, and would be phased to allow for the re-location of the existing badgers prior to construction elsewhere on the site. Selected higher value trees would be retained, and landscaping and ecological mitigation measures would be provided on site. In addition, provisions would be secured for off-site mitigation to reach a target of 20% biodiversity net gain.
- 2.5 Twelve (12) car parking spaces are proposed (including 3 disabled bays) all provided with passive or active electrical charging points. One car club space would be provided on Neptune Road. A new vehicular road would be constructed on site, utilising the existing vehicular entrance from Neptune Road. In addition, a new pedestrian access would be created to The Gardens, improving the connectivity of the site and providing close access to the West Harrow station.
- 2.6 Six short stay and 63 long stay cycle parking spaces (for a total of 67 spaces) would be provided on site.
- 2.4 Separate refuse storage would be provided for each block, with wheelchair accessible apartments in Blocks 2 and 3 having private bin stores for greater convenience.
- 2.5 Air source heat pumps and PV biosolar roof space would be provided on site. Sustainable urban drainage (SUDs) would be provided to reduce surface water run-off.

3.0 RELEVANT PLANNING HISTORY

Ref no.	Description	Status and date of decision
WEST/103/98/ FUL	<i>Land Rear of 171-255:</i> Detached 2 storey building to provide 6 two-bed flats 8 semi-detached & 3 terraced houses access & parking	Refused: 07/04/1998
WEST/67/99/ FUL	<i>Land Rear of 171-255:</i> Establishment Of Wildlife Reserve	Granted: 19/03/1999
WEST/130/99/ OUT	<i>Land Rear of 171-255:</i> Outline: Provision Of 37 Space Car Park For Use By Adjoining Industrial Estate	Refused: 10/05/1999
WEST/131/99/ OUT	<i>Land Rear of 171-255:</i> Outline: Detached Building to Provide Nine, 2 Bed Flats With Access And Parking And Provision Of Public Open Space Appeal: Withdrawn (APP/M5450/A/99/1027487)	Refused: 10/05/1999
P/2632/04/CFU	<i>Land Rear of 171-255:</i> Two Storey Building To Provide 8 Flats With Access And Parking. Appeal: Dismissed 29/02/2006 (APP/M5450/A/05/1172320)	Refused: 18/03/2005
P/3450/21	Development of four detached buildings comprising residential units (use class C3); New vehicle and pedestrian accesses and gates; Car parking; Cycle parking; Refuse stores; Landscaping and Boundary Treatment; Retaining Wall; Amenity space	Withdrawn
P/0376/23	<i>Land Rear of 171-255:</i> G11 (T31) Ash (land rear of 203-205 Pinner Road): Self-sown tree. Decay present on stem. Fungal brackets visible on stem. Cavity on stem. Major bark wounding on stem. Unbalanced crown shape. Pseudoinonotus hispidus causing internal decay. High risk of limb failure. To monolith tree at 6-8m to reduce risk of limb failure.	Granted; 17/03/2023

4.0 **CONSULTATION**

- 4.1 A total of 457 consultation letters were sent to neighbouring properties regarding this application. Three site notices were also displayed. The overall expiry date of the first consultation was 4th April, 2023.
- 4.2 A total of 298 responses were received, including a number of objections from outside the Borough (approximately 70 responses).
- 4.3 After the receipt of amended details, a 14-day re-consultation was carried out, expiring on 24th and 27th October 2023, with three site notices posted on 25th October 2023. The final total of comments received was not yet available at the time of the writing of this report and will be reported via addendum, along with any impacts or changes the consultation responses may have on the contents of this report.
- 4.4 A summary of the responses received to date along with the Officer comments are set out below:

General Objection

Object to proposal.
Proposal does not address previous objections raised.
Cosmetic changes to previous proposal.
Committee should visit the site.
Does not benefit community.

Principle/Housing

Harrow has more than met demands for housing.
Proposal will not solve housing crisis.
Flats typically have unreasonable price tags and make fun of us by mentioning "affordable living". New development usually unaffordable for average resident.
Will commercialise what has previously been a village.

Officer comment: Addressed in Section 6.3

Character/Appearance/Site & Site Design

The site is tight/narrow.
Unsuitable/ inappropriate site for development.
Overdevelopment of site.
Embankment was designed as a buffer to prevent noise and not meant to be developed.
"Ribbon" development is worse than backyard development.
Not enough space for 3 buildings.
Density inappropriate for site. Increase in housing density objected to.
Design is inappropriate for site.

Would dominate existing houses along Pinner Road.
Out of character with existing houses.
Adverse impact on character.
Disproportionate visual impact.
Scale and mass are inappropriate for site. Out of keeping with low rise terraced houses of the area.
Height of development would dwarf surrounding existing buildings.
Would be a gated community.
Too close to railway.
Security of railway would be compromised.

Officer comment: Addressed in Section 6.4

Development Across Harrow

Harrow is overdeveloped, too many high rises / not enough green space.
Local area is already built up.
Development should be built somewhere less dense; there are lots of other places to build further out.
Local area cannot support additional housing.
Changes in local neighbourhood in recent times; more crowded now.
Should build on brownfield land rather than green land.
Too crowded / too many people now living in this area.
Too much commercial development in Harrow. Too much housing development in Harrow.
Development at other sites in Harrow is unsatisfactory; more towers should not be allowed.
Flats in other development in Harrow are unoccupied. Existing flats should be occupied before more are allowed to be built.
Harrow is too developed/too much concrete/ urban jungle/too many towers/too many flats/not enough green space for residents. Residents don't want more flats/urban jungle.
Harrow has lost its charm and character/ no longer a leafy green suburb.
If development is granted, will join West Harrow's accelerated developments with every scrap of land being turned into urban jungle, departs from Metroland origins.
Development would result in more similar applications, may result in allotments gardens being developed.
Sets a bad precedent.

Officer comment: Development at other site or areas of Harrow are not a material consideration within the scope of this application. However, it is noted that under current planning policy and legislation, LB Harrow does have an obligation to deliver more housing provision.

Residential Amenity

Overlooking of rear of properties along Pinner Road, unacceptable loss of privacy.
Harrow has a history of refusing high patios for overlooking, as per this development.
Disturbance
Overbearing appearance. Would appear greater than 4 storeys due to high ground.

Impacts on outlook from existing houses.
Loss of security (due to windows/balconies overlooking other properties)
Loss of daylight/sunlight. Overshadowing to houses and gardens.
Loss of privacy and visual amenity.
Loss of buffer zone / sound barrier between existing houses and railway (visual and sound).
Loss of quiet green area to the rear of existing houses, which is particularly important as Pinner Road is very busy. Loss of green space which benefits resident's mental health.
Development will be noisy.
Will be disturbing to see the proposed development from existing houses.
Any development at back of existing properties would significantly impact quality of life for residents.
Existing environment around Neptune Road is poor quality due to industrial uses, noise, traffic; development would exacerbate this.
Over development affects quality of life.

Future Occupiers

Would result in poor quality of life for adjacent residents. Loss of health and happiness.
Increased light pollution for residents.
Future occupiers will likely be vulnerable people and will be exploited via the poor conditions of the development.
Future residents will be living in an unsuitable environment, including disturbance/noise/vibration from railway/railway maintenance. Poor quality living conditions for future occupiers in a squashed site.
Residents living near railway lines at risk of noise and air pollution; health and safety implications for future residents.

Officer comment: *Addressed in Section 6.5, and with relation to green space, Section 6.8*

Loss of security / increase in crime to existing houses due to introduction of vehicle road within site. Would create a place for drug use activity.
Nothing will stop strangers access properties of Pinner Road over the fence from the development.

Officer comment: *Addressed in Section 6.4*

Increase in residents would exacerbate inequality.
High urbanisation leads to deaths.
High rise flats are reported to have poor health outcomes for residents.

Officer comment: *The proposed density would be consistent with suburban areas, and would not be considered a high-density development (e.g. as per D4 of The London Plan, which would define high-density as 350 units per hectare). The proposal does not include any high-rise development.*

Traffic & Parking

Parking survey does not appear accurate / must have been done at a quiet time.
Proposed parking is inadequate. Parking pressure in local area will be worsened, which affects residents and local shops. Development will result in a greater number of cars than parking spaces. Where will additional cars be parked?
Developer hopes people will cycle or take public transport, but I don't agree.
Increased traffic/congestion, which would result in safety issues for local residents/school.
Traffic/congestion already increased due to school expansion.
Existing traffic levels from non-residential uses are too high, causing delays/congestions for residents.
Emergency vehicles will be blocked.
Development would increase traffic and thus danger outside front doors of local residents.
Neptune Road is too narrow to handle additional traffic. Neptune Road is already congested and noisy with constant movement of vehicles, improperly waiting vehicles obstructing entrances to driveways, cutting corner, extreme congestion, etc. causing delays in travel.
Cars already drive into Neptune Road the wrong way, with no repercussions.
Parking for local residents is already "cutthroat" with regular illegal parking; Neptune Road used for parking by residents. The Gardens already has a shortage of parking.
Blind spots on Neptune Road; expect lethal accidents will happen and risks will increase with development.
Cumulative congestion from other developments in the area.
Access next to a bridge is not considered.
No access should be provided to The Gardens.
Busy access next to Pinner Road not considered.
Access road would be insecure.

Officer comment: Addressed in Section 6.4

Environmental Health/ Air Quality/Pollution

Concerns regarding Air Quality matters and whether this accounts for increases in air pollution which might arise from the development.
Site levels and levels of road and parking would result in overbearing impacts and would result in loss of privacy and security, disturbance, noise, loss of visual amenity.
Raised road above the level of adjacent properties would result in pollution/toxins to those properties.
Local area is already polluted.
Increased noise and pollution. Pollution already high and air difficult to breathe while walking.
Roadway within development is raised above the level of Pinner Road properties, so would result in undue noise, pollution and loss of visual amenity.
Noise, disturbance and pollution from construction.
Traffic, noise, and pollution after construction.
Difference in levels between houses and site would result in rain washing toxins from cars into houses.
Pests, mice, rats and foxes may disrupt gardens of existing houses.
There is an existing problem with pests/rats

Increased vermin if flooding occurs.
Health risk to existing community.
Neptune Road's environment is unhealthy (diesel/oil from lorries and noise), development will exacerbate this.

Officer comment: Addressed in Sections 6.11, with additional information in Sections 6.5 and 6.6

Biodiversity/ Green Space

Loss of important green space (amenity, mental health, regulate temperature, reduce air pollution, place for people to enjoy nature.) Covid highlighted importance of this type of space.

Loss/destruction of valuable green space / green corridor. Loss of established woodland. Green character of existing land would be lost.

Existing environment around houses is poor and loss of the trees/wildlife on this land would make living conditions unbearable.

Loss of visual amenity. Removal of trees. Trees provide joy. Beautiful woodland, should not be destroyed. Loss of trees would reduce oxygen/ increase climate change impacts.

Site is currently used by wildlife/ loss of wildlife habitat/ haven for wildlife. Impact on wildlife.

Brown long-eared bats sensitive to light and travel along trees/vegetation; development will remove one of last remaining viable commuting routes for them.

No invertebrate study done; and development would result in removal of dead wood. Bird nesting and foraging would be removed.

Lighting would affect reptiles.

Threat to wildlife.

Wildlife cannot be moved.

Wildlife not taken into account. Wildlife groups and experts not consulted.

Future occupiers of the development might not like wildlife and may commit crimes/harm against them. Overstretched wildlife groups would then have to investigate.

Loss of flora/fauna. Lost vegetation provides noise buffer with railway track and would be lost, increasing noise pollution for residents.

Negative impact on environment. Damage to ecosystem.

Mature trees not likely to be retained.

Loss of trees affects air temperature/shading/envirotranspiration.

Plan incorrectly show fewer trees on site than there actually are.

Natural/green areas in general need to be retained and protected. Not enough green areas in the local area / in Harrow. Children play in green spaces, including this one.

Britain is a nature depleted country; wildlife on decline due to overconsumption.

Objection due to lack of sustainability.

Site is an established wildlife reserve.

Site was designated as a green corridor a decade ago, which should ensure that benefits are not forfeited.

Jeopardizes government commitment to climate change.

Harms wildlife for money.

Landscaping measures do not at all compensate for destruction of the existing corridor.

Should resist development to ensure Harrow remains a green borough. Harrow needs to focus more on creating green space/ eco system.
Too much green space already lost in Harrow Borough.
10% biodiversity gain is impossible to achieve.
No survey of existing plant species provided.

Badger mitigation

Badger mitigation is inadequate. Cannot enforce exclusion zone as site is small.
Harm to/death of badgers. Disturbance to badgers. Badgers are a protected species.

Loss of natural badger sett, use of artificial one. Loss of natural badger habitat.
Artificial sett is likely to fail. Artificial sett too close to footfall/road, would harm badgers. Artificial sett not in location chosen by badgers. Badgers may not understand how to stay in man-made environment or may reject the sett and be forced elsewhere.

It's not possible to move badgers to an artificial sett.

Badgers not likely to survive construction work.

Site should be left for the badgers. Badgers need a safe space to live. Flats can be built elsewhere.

Developers in general don't care about badgers and will just take risks and pay fines.
Badgers have been living on site for years/decades.

Not enough information on management of the conservation (badger) area.

Don't trust consultant and provisions should be made by true experts.

Japanese Knotweed

Japanese knotweed is present on site and can't be/not likely to be eradicated.
Should be better managed. Proposals should not even be considered until knotweed is permanently removed.

Proposal will cause Japanese knotweed to come back or find its way to nearby homes.

Building on site will suppress Japanese knotweed which will need to then find alternate route to reach the surface and will therefore come into adjacent existing gardens

Unclear who would be responsible for clearing knotweed.

Trees

Arboricultural report is poor because it does not show how to retain trees and mitigate first, but works around the development. Development should work around trees.

Developer vandalised the tree line to make it easier to get permission.

Ecology report is unsatisfactory as it is written to mitigate the proposed development and does not assess the site and its contribution to the local area. Development should work around ecology.

Unclear how bio-diversity would be improved given buildings to be introduced.

Fly tipping and poor-quality trees on site should be dealt with by developer without constructing flats.

Officer comment: Addressed in Section 6.8, with climate change specifically addressed in section 6.9. Noise/loss of noise buffer is addressed in Section 6.5.

Crime

Development would result in increased crime in the area. As it is out of character with the area.

Low level lighting along badger area will increase crime and provide escape route for criminals.

Character of Harrow would be changed by the development to increase crime and anti-social behaviour.

Crime increasing in Harrow and development may make this worse.

Officer comment: Addressed in Section 6.4

4-storey building should not be allowed near school in order to protect children's safety.

Crime increases in Harrow must be cause by / correlated to increases in population.

Officer comment: It is unclear how the safety of children at local schools would be impacted by development of flats, regardless of size. Areas of high population densities are not necessarily directly correlated with crime, thus planning policy does not disallow high density for this reason but rather requires development, regardless of density, to incorporate Secure by Design principles.

Energy/Carbon Dioxide

Existing development around the site produces large amounts of carbon thus result in health problems for the local residents. Development will add to carbon dioxide. Removal of trees will worsen carbon dioxide / contribute to global warming/ contribute to biodiversity decline.

Officer comment: Addressed in Sections 6.8 and 6.9.

Flood Risk & Drainage

Risk of flooding

Disruption to habitat would increase flood risk.

High risk of blocked drains, causing flooding and unsanitary conditions/ damage.

Existing street drains overflow in heavy rain; development will increase concreted area and waste water on site thus will increase amount of water flowing to drains.

Cutting into embankment could cause subsidence/flooding to railway.

Officer comment: Addressed in Section 6.7

Waste

Proposal may result in flytipping on the back of Pinner Road properties. Would result in more mess for existing residents.

Flytipping is being done from/within other development in the area which have inadequate waste provision; so this development will likely result in more flytipping. If future occupiers don't have cars they will fly-tip more.

Council is bad at picking up trash so development will bring in rats.

Amount of rubbish on site is exaggerated by developer, and is small in comparison to the site area.

Officer comment: Addressed in Section 6.6

Local Services

Fear/worry that pressure on parking/schools/services had not been properly planned.

Local services (schools, GPs) are already full/stretched and cannot accept new patients. Local schools oversubscribed so that nearby residents can't get their children in. Residents leaving to find area with better schools/lower population.

Local services should have more investment before construction of new buildings. Insufficient infrastructure.

Lack of adequate playing area for children of existing population; loss of pre-existing play areas & fields to development.

Neptune Road is neglected by Council, e.g. cable TV and phonenumber offered only recently, so morale is poor and problems such as criminal activity, graffiti and flytipping have resulted.

High cost to council from public lighting, rubbish collection and access road maintenance.

Officer comment: Provisions of local services lie outside the purview of planning in certain respects, where these powers are delegated to other authorities. Some services e.g. cable TV, are via private providers rather than government services. For the purposes of planning, provisions to support local services is made under the Community Infrastructure Liability (CIL), which is applicable to this application.

Statement of Community Involvement (SCI)

Developers did not try to contact West Harrow Allotments & Gardens Association, contrary to this document.

Claims that developers have lied in presenting the findings of community feedback from consultation.

Officer comment: Addressed in Section 6.12

Other

Tensions and conflict could arise between future occupiers of the development and existing occupiers of Pinner Road.

Surrounding residents are upset and worried, and are already dealing with multiple other problems (pandemic-related difficulties, cost of living crisis).

Developer not properly maintaining existing fencing on site.

Construction will involve cranes which will be hazardous to homes and nearby school, due to risk of collapse and could cause death or injury.

Existing roads are in bad repair and not taken care of.

Overpopulation contributes to deaths in pandemics such as Covid.

Development is for profit.

Development is to benefit council through taxes.

Don't like the idea of new residential development in the area.

Previous applications were refused (P/2632/04/CFU/TW, WEST/103/98/FUL, WEST/130/99/OUT), Should be refused for same reasons. Smaller development have previously been refused.

Previous application ref: P/3450/21 was withdrawn and strongly objected by residents / petition presented. Residents still object for the same reasons. Residents have not been treated with respect by developer; indicates they will continue to do so if permission is granted.

Decision is emotional for residents, although it is business for the developer. Increasing divisions and social problems in Britain, the proposal will exacerbate them.

Violation of resident's human rights, as schools/GPs not expanded, lack of dedicated policing plan to town centre (increase in crime/anti-social behaviour) loss of flora and fauna, increase pollution/pests, loss of local employment, building in areas close to town centre but not affluent outer suburbs; therefore local people are subject to class discrimination.

ULEZ has been expanded.

Can Harrow guarantee children and elderly will not be targeted/ young people will be protected /policed?

Council should be working on addressing issues affecting the community/ poor roads/ problems which lead to deaths during Covid and not this development.

Problem with spitting, staining of walls and pavement in local area should be addressed.

Residents have already had to object to previous proposals.

Some flats on other sites being sold to foreign investors/ overseas.

Council should have stopped development at an early stage as it is costly to residents and Council to continue.

Higher insurance for existing community.

Harrow Borough failing to meet long-term strategic priorities (affordable housing, health & wellbeing of residents, pollution, global warming).

Residents not getting value for money in taxes paid.

Overpopulation will affect property values, who will compensate residents?

Developer has no track record of delivering eco-friendly housing, how can delivery be guaranteed/policed?

Officer comments: *These are not material planning considerations.*

Alternative Uses for Land

Council should buy the land from the developer and keep it as green space / place for badgers / amenity for residents.

Land should be used for a nature reserve instead.

Land should have had a "greener label"; should be designated as a "SANG"

Land should be left alone.

Need more "spare" land.

Officer comments: *The site is privately owned and the Council cannot compel the developer to implement alternative uses.*

Comments made in Support:

- Proposal will turn unloved land into something which will add to local biodiversity.

- A number of objections are from those who have no interest in the land and will continue to use it as a dumping ground.
- Proposal appears to be well-considered and would deliver much needed affordable housing. Housing crisis necessitates building of more housing.
- Will help gentrify the area and boost local economy.

4.5 Statutory and Non-Statutory Consultation

4.6 The following consultations have been undertaken, together with the responses received and officer comments:

Planning Policy

- It is noted that there are designations that are in place by way of Tree Preservation Orders, however there are no other specific restrictions to developing the site. Further noted that under application WEST/67/99/FUL, permission was granted for the establishment of a Wildlife Reserve. It is not known if this was ever implemented, however, it does not appear to have been carried over into current policy insofar as a designation (Development Management Plan or allocated sites).
- Application P/3450/21 was submitted August 2021 for a similar development as currently proposed, however this application was subsequently withdrawn in February 2022 to address issues in relation to Badgers on the site and Biodiversity Net Gain. It is noted that there was no objection to the principle of redevelopment of the site.
- The current scheme submitted under P/0669/23 proposes a similar scheme, albeit with 37 residential units across three buildings, a reduction from 45 units across four buildings. The reduction in building footprint across the application site has allowed for an improvement to the biodiversity matters on the site, which were a significant concern under the previous application (P/3450/21). The acceptability of this will need to be considered in consultation with the Council Biodiversity Officer, and any off-site contribution required secured appropriately.
- The proposed development is required to be zero carbon, as required by the London Plan (2021). The supporting information sets out that the on-site carbon savings have followed the London Plan (2021) energy savings hierarchy, with the scheme delivering 64% savings. This exceeds the 35% on-site savings as required by the London Plan (2021). The remaining 36% (to meet the zero carbon) shall be off-set by a financial contribution which will be secured through a S.106 obligation.
- The proposed development would provide a meaningful contribution to the boroughs housing stock, which would assist the borough in meeting its London Plan (2021) target of 802 homes per year. Furthermore, the planning application proposes to provide 35.5% (by habitable room) and also offer this in a policy compliant split of 70% London Affordable Rent and 30% Shared Ownership. In the event that the Housing Department is

satisfied with AH offer, an early stage review mechanism will be required to be secured by way of a S.106 obligation.

- It would be recommended that the private housing mix be reviewed, as the level of 1b, 2p units appears to be too high (close to 60%). Given the more suburban nature of the site / area, rather than a more urban context or town centre location, less 1 beds and more 2 and 3 beds should be prioritised.
- The principle of residential development on this site is acceptable.

Project Enabling Officer, Housing Services

- The council requires the maximum reasonable level of Affordable Housing (AH) with a borough wide target of 40% AH. This scheme is offering 10 AH units (36% by Hab rooms) of the total 37 residential units, which means whilst the scheme does not meet the 40% borough wide target, it does meet the Mayor of London's fast track route requirements of 35% AH.
- The scheme falls in acceptable proximity to the Borough's tenure requirements of 70% London Affordable Rent / 30% Intermediate with their offer of 73:27 by Hab rooms which Housing supports as this means the scheme is geared towards the borough's priority housing need (for London LAR homes).
- The bed size mix of the London LAR homes being proposed also supports the Housing Register's priority need for family sized (2 and 3 beds) London LAR homes. The 7x London LAR homes are being offered as 5x 2b4p (72% of the total LAR), 1x 3b5p (14%) and 1x 1b2p (14%). Housing would therefore support this mix.
- Housing have no comment on the size or configuration of Intermediate units.
- The scheme also meets Housing's requirement for 10% of all the LAR units to be fully wheelchair adapted with a 2 or 3 bed preference by offering 1b2b4p and 1x1b2p w/ch units (29% of the 7 LAR units).
- For management reasons, Housing would not support a scheme where LAR homes share a core with other tenures, however would support Intermediate homes sharing a core with Private homes.
- Overall, Housing would support this scheme.

Economic Development Officer

- We have no comments relating to the proposal itself.
- As a major application, we will be seeking the following to be included in any s106 agreement if approval is given:
 1. Construction Training – a requirement to produce a training and employment plan and provide a financial contribution.
 2. Local Supplier targets

LBH Highways

- Subject to conditions and obligations, Highways have no objection.

Trip Generation

- The TA indicates that the majority of future residents will travel by sustainable modes in alignment with boroughwide activity. It is anticipated that the planned mitigation measures will increase this number. The targets are ambitious. The plan is reliant on travel planning however, compliance in a relatively small residential development may be difficult to achieve and will only realistically happen over a duration.

Road Design

- A road safety audit of a proposal for this site was carried out recently but did not identify any issues with the design. Concerns raised in a previous RSA have been resolved/will be reviewed at detailed design stage.
- The proposed design of the new access is generally acceptable. A highway agreement will be required to enable the developer to carry out the work. A contribution will be required to add additional signage for the one-way operation of Neptune Road.
- It is understood that the objective is to maximise the potential of the site and not have the road as the main feature, instead dedicating more space to nature. It is also accepted that narrower streets with low traffic flows are more likely to achieve the intentions of a 'shared surface,' however, this has to be balanced with the increased risk to the most vulnerable road users such as children, elderly and disabled people.
- Swept path drawings have been supplied which demonstrate that cars and lorries can access this site. There is sufficient turning space for both types of vehicle and cars can easily pass each other; there may however, be difficulties with passing lorries. However, the anticipated flow of vehicles likely frequency of vehicles passing each other is very low, with only 12 parking spaces. Therefore, provided the route is well lit and maintained, the risk to pedestrians is also likely to be low.
- 37 flats wouldn't generate a significant level of HGV deliveries per day – deliveries are more likely to be undertaken by smaller vehicles eg. shopping and small van deliveries.
- It will be necessary to ensure that the street is designed in such a way that on-street parking cannot occur. Should parking demand exceed the number of dedicated spaces provided, it may lead to parking on-street within the development which may cause access issues for larger vehicles and increase risk to pedestrians and cyclists. Additionally, overspill parking may also occur which could impact on the surrounding streets.

Surrounding Highway Network

- The Transport assessment includes information on existing traffic flows using Pinner Road, Neptune Road and the two Pinner Road/Neptune Road junctions. This proposal does not raise any significant concerns as the likely traffic generation is considered to be minor. No alterations to these roads or junctions are required in relation to this development proposal.
- There are good existing pedestrian facilities in the surrounding area. West Harrow tube station is easily accessible on-foot from this site and Harrow town centre is also within a short walk, where there are numerous buses and rail services available along with high street shops, restaurants and leisure facilities.
- There are existing cycling facilities but it should also be noted that the Council plans to introduce new/improved measures to the route between Harrow town centre and Pinner station which will benefit future residents.
- Road traffic collision information has been provided covering the last five years. Many of the accidents were recorded as being 'slight' and appear to have been at junctions. This is not uncommon, and the development proposal is unlikely to affect this level of incidents. There were four serious accidents recorded over the study period; the assessment did not identify any specific pattern or requirement for remedial measures that would be required in relation to the development proposal.

Parking Provision

- The proposal includes 12 parking spaces (ratio 0.3) with three of these spaces allocated as disabled person's parking spaces and six with active electric vehicle charge points and the remainder with passive provision.
- The London Plan 2021 maximum parking standards would allow up to 0.5 - 0.75 spaces per dwelling in a PTAL 4 location; for this proposal that would equate to a maximum of 19-27 spaces (the lower standard should be applied to high density proposals or in more accessible locations). In line with Policy T6, the starting point for considering levels of parking should be 'car-free' where there is good access to public transport in any case and proposals should be considered in line with the highest anticipated PTAL for the site.
- The existing controlled parking zones U (Mon-Fri, 10-11am & 2-3pm) and W1 (Mon-Sat, 8am to 6.30) do not encompass this land however, parking surveys were requested in order to establish whether overspill parking may impact on these areas.
- Parking surveys were undertaken in 2021 (8am to 8pm) and in 2022 (overnight) which show that there is excessive stress on some roads during some periods of the day however, generally across the area there is still a good level of capacity for additional parking.
- Based on the worst case level of demand (28 cars) presented in the Transport Assessment, there could be an overspill parking demand for 16 spaces – throughout the entire survey period, there were at least 62 spaces. On this basis, the suggested mitigation of a permit restriction

agreement, car club space, travel plan and parking management plan are acceptable.

- A minimum of one disabled parking space each for 3% of dwellings (1 no.) is required from the outset and a Parking Design and Management Plan (LP2021 Policy T6 J and T6.1 G) should also be submitted demonstrating how bays for a further 7% of dwellings (3 no.) could be converted to disabled parking should demand increase.

Cycle Storage

- The proposal includes 69 long stay and at least 6 short stay cycle parking spaces. Based on London Plan 2021 requirements, the proposed level of provision is acceptable.
- The long stay spaces must be secure, sheltered and accessible. At least 5% of stands should be suitable for use by non-standard cycles eg. tubular stands. The short stay spaces should be on a level surface, close to the entrance/exit to the blocks. The London Cycling Designs Standards Chapter 8 provides guidance which should be followed.
- The design for the cycle stores must be provided and agreed prior to commencement of development; this should be secured by pre-commencement condition to allow for any necessary design changes to be considered before construction begins.

Delivery and Servicing

- Deliveries are to be undertaken within the site. There is no dedicated parking area for large vehicles meaning that they will have to wait on-street during loading and unloading. This may not be a problem considering the low number of vehicles expected to use this site. The TA considers the possibility of two HGV's needing to pass each other and suggests that the hard surface of the 'private strip' could be used. Although this is intended primarily for pedestrian use, the flow of pedestrians and vehicles is likely to be low and the likelihood of this situation occurring is also low.

Construction Logistics Plan

- The submitted outline CLP is acceptable. A detailed CLP is required prior to commencement, following TfL guidance and format.

Conclusion

- The proposal is within a location that has good access to public transport, cycle routes, shops, schools and other amenities. It would be reasonable to expect that some people could live here without having to rely on a private car.
- The most significant possible impact in Highways terms that we could expect from this proposal would be overspill car parking. The assessment does indicate that the likely demand generated by this site may be higher than the proposed level of parking. It is reasonable to expect people who predominantly travel by sustainable modes and need access to the

particular nearby public transport options, schools and/or workplaces to be the future occupiers. It is therefore reasonable to anticipate an amount of overspill parking but this could be lessened with appropriate marketing and implementation of a strict and ambitious travel plan. Good quality, accessible cycle parking is also essential for achieving modal shift as is a safe and well-maintained environment within the shared surface. Whilst we accept that overspill parking may occur as a result of this development, the parking survey undertaken indicates that these vehicles could be accommodated and there is no requirement to review existing parking controls at this stage.

- The overall impact is unlikely to be severe; surrounding roads and junctions would continue to operate within capacity with no significant queuing anticipated, mainly due to the low level of car parking proposed. The variety of public transport locally does mean that new trips would be spread amongst these options and are also unlikely to have a noticeable impact.
- Subject to conditions and obligations, Highways have no objection.

Travel Plan Officer:

- The development should ensure details of the TPC are provided to the Council and update a commitment to this in the Travel Plan
- Commit to a baseline survey following occupation (within 6 months or at 75% full, whichever is first)
- Revise targets, if necessary, following the baseline survey (update in Travel Plan)

Vehicle Crossing Officer

- No objections as the road (access) is already formed.
- This site is accessed from Neptune Road which is a one-way road. This will need to be signed on Pinner Road and they need to apply through the vehicle crossing team to advertise this and it should be reflected within their CLP.

London Underground/ TfL

Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to railway infrastructure. Therefore, it will need to be demonstrated to the satisfaction of TfL Infrastructure Protection engineers that:

- our right of support is not compromised
- the development will not have any detrimental effect on our structures either in the short or long term
- the design must be such that the loading imposed on our structures is not increased or removed

- we offer no right of support to the development or land

Therefore, we request that the grant of planning permission be subject to conditions to secure the following:

The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with TfL Infrastructure Protection) have been submitted to and approved in writing by the local planning authority which:

1. Provide details of any structural or civil engineering works to ensure that such works do not impart a risk to London Underground's operational railway. This will require full and ongoing consultation with TfL Engineering Infrastructure Protection
2. Prior to commencement of each phase of the development, provide details of foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent),
3. Provide details on the erection and use of tall plant (e.g. tower cranes (incl. slew radius), mobile cranes (incl. slew radius) and piling rigs) prior to commencement of those specific works
4. provide details of any removal of trees and the method to be used
5. Site specific Risk Assessments and Method Statements (RAMS) to be agreed with TfL Engineering for any activities (e.g. demolition, piling, groundworks, excavations, scaffolding, cladding, craneage etc.) which TfL may deem to be a risk to LU. The RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing. It is accepted that various RAMS can only be compiled and issued at later stages in the programme.
6. provide details of vehicular access to and from the site
7. provide details on prevention of vehicle incursion from the proposed access roadway onto LU operational property.
8. Written confirmation will be required from the statutory body (e.g. Thames Water) that the works near their buried main will be undertaken in a manner that does not negatively impact on London underground's land, infrastructure, or assets.
9. accommodate the location of the existing London Underground structures
10. developer to enter into a party wall agreement with TfL
11. there should be no opening windows or balconies facing the London Underground elevation
12. No glare or glint to be shed onto the railway during the construction phase, after the structure has been built and throughout its occupation, or site lighting throughout.
13. demonstrate access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering our land
14. demonstrate that there will at no time be any potential security risk to our railway, property or structures
15. accommodate ground movement arising from the construction thereof

16. mitigate the effects of noise and vibration arising from the adjoining operations within the structures
17. No claims to be made against TfL or London Underground by the Local Authority (i.e. Harrow Council), purchasers, tenants, occupants or lessees of the development for any noise or vibration or changes to air quality resulting from London Underground running, operating and maintaining the adjacent railway, embankment and vegetation thereon

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

We also ask that the following informative is added:

The applicant is advised to contact TfL Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; drainage; excavation; construction methods; tall plant; scaffolding; security; boundary treatment; safety barriers; landscaping and lighting.

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Additional Comments:

- Any Construction Logistics Plan should be prepared in accordance with published guidance, which can be found here: https://www.clocs.org.uk/page/construction_logistics This should be provided and compliance secured by condition, to be considered by the LPA and the local highway authority, to address TfL concerns about impact and construction mitigation. This includes impacts from construction traffic to Strategic Road Network (Pinner Road) and our bus services that use it.
- In general, the CMP and CLP look ok, as do the numbers of vehicles for construction proposed. The lorry route seems ok. The CMP show how they manage access on site, none of which is directly onto the SRN. I would expect there wouldn't be any need for any traffic management on Pinner Road given this.

- Suggest a condition the outline CLP that they provide a more detail CLP before they commence on site.
- TfL also produces guidance on temporary traffic management, which can be found here: <https://content.tfl.gov.uk/temporary-traffic-management-handbook.pdf>, which may be helpful.

Officer Comment: Details cited above which fall within the purview of planning and can meet the relevant NPPF tests with regard to conditions have been included as part of conditions attached to this permission.

Network Rail

- Network rail has no objections as this is LUL (London Underground).

Network South East, North

- No comments received.

LBH Waste Management Officer

- Arrangements are acceptable.

Drainage

- The Flood Risk Assessment & Drainage Strategy submitted is acceptable, however the access to the site from 'The Gardens' is identified within surface water flood zone 3a & 3b according to our surface water flood maps and the flood risk should be assessed in the FRA.
- The applicant has not addressed this flood risk, and it cannot be conditioned.
- The applicant must address flooding at access point from The Gardens (dry/safe access to site) before we can recommend conditional approval, and *Emergency Flood Plan, NPPF and EA flood warning procedures for evacuation.*
- Once this is approved by us the application can be conditioned with our standard drainage conditions for surface water disposal, foul water disposal and surface water attenuation & storage

Comments to revised details:

- We can confirm that the additional details submitted are satisfactory and the application can be conditioned with our standard drainage conditions for surface water disposal, foul water disposal and surface water attenuation & storage.

Officer Comment: The above conditions have been attached.

Environment Agency

- No comments received.

Urban Design Officer

Context

- There are multiple constraints presented by this narrow backland site, bordered by the railway line to the south and rear gardens of Pinner Road properties to the north. The site topography is a key consideration, as is the TfL no-build zone adjacent to the southern boundary.
- The general built form of existing residential properties is two-storey (for Pinner Road fronting dwellings), with the recent garage site development on The Gardens being three storeys inclusive of habitable roof space, albeit this development is much closer to existing properties. Despite this context, there is considered to be sufficient setback and separation from existing dwellings to warrant increased height on site to a maximum of four storeys.

Site Strategy

- Given the highly constrained nature of the site, (narrow width and proximity to railway lines and rear gardens) a development of three blocks comprising 37 flats is considered to provide a good level of density without risking overdevelopment or significant overbearing to surrounding sites.
- The current biodiversity of the site is its greatest asset and it is highly positive to see that an inaccessible badger protection zone has been provided, as well as a limited area of building footprint when compared to the overall site area.
- The western pedestrian access route to The Gardens is required but must be well-lit, given it lacks much passive surveillance, with no buildings adjacent to it. A gated and keyed, resident-only access system is supported.
- There is concern that doorstep play is located very close to the access road. Additional measures such as further traffic calming measures or bollards are encouraged.
- Proposed parking locations are supported, with accessible spaces spread throughout the length of the development, adjacent to blocks.
- The inclusion of several freestanding refuse stores to Blocks 2 and 3 is not supported. These should be housed within proposed building footprints to limit visual clutter within the site.
- A gated and fobbed vehicular access point to the east of the site is supported.

Massing, Scale & Built Form

- Generally, overall height and size of building footprints for Blocks 1, 2 and 3 are supported and present a limited level of overbearing to rear gardens to the north of the site. Development is well set back from The Gardens and will have minimal impact on the street scene of this road and good

distances are maintained from rear elevations of Pinner Road properties and the north elevations of proposed blocks.

- The scale of Block 3 is considered appropriate. The third floor is inset and has a much smaller footprint compared to floors below, appearing highly subservient when compared to the rest of the building massing. This reduces actual and perceived massing.
- Overlooking to rear gardens and habitable room windows of Pinner Road properties is considered to be mitigated through a reduced number of window openings and moderate heights of blocks.

Layout, Aspect & Orientation

- There is concern regarding the amount of daylight to the lower ground floor units of Blocks 2 and 3.
- There is general support for the internal layout and arrangement of Blocks 1 and 2, and the level of dual aspect units provided.
- There is concern as to why Block 3 ground and first floors feature north-facing balconies, with a stair core and shared corridors facing south. This seems contrary to best practice, which would be to maximise south-facing amenity spaces and residential aspect for adequate daylight and sunlight. There is an opportunity to revise this and create south-facing amenity spaces, which would also reduce overlooking to existing dwellings and rear gardens to the north.
- There is support for cycle store locations for all blocks.

Public Realm & Landscaping

- The proposed landscape strategy is supported, as is the incorporation of an inaccessible badger protection area.
- The proposed lighting strategy is supported and addresses pedestrian access from the east and west of the site, as both routes are not well-overlooked.
- Given the proximity of the site to the Metropolitan line, the southern boundary treatment must be well considered. Provision of foliage and hedging to green this boundary and partially limit noise pollution from the railway line is welcomed.

External Appearance, Composition & Materiality

- There is significant concern regarding the north elevation of all proposed blocks. These are not visually attractive, with large expanses of poorly articulated brickwork and would provide a poor outlook for Pinner Road properties and rear gardens which adjoin the site.
- Of particular concern is Block 3 especially fenestration. In addition to concerns with the north elevation, the south elevation fails to maximise this southern aspect, featuring small windows and overly large areas of inactive or plain façade. Window opening alignment is required and larger window openings sought.

- The proposed external material palette is supported. The use of a red/brown metal cladding to the uppermost storeys and lift overruns is welcomed, successfully terminating blocks and providing visual interest. The use of vertical larch timber cladding to stair cores and inset balcony inlays is also supported and creates a hierarchy of material use. Brick as a predominant external material is supported. Efforts to add visual interest through projecting course feature panels are welcomed but could go further for all elevations, given the large expanses of brickwork, particularly for overly longitudinal elevations such as the north and south elevations of Block 3.
- Precedents shown are not reflected in the architectural design. Some are ambitious but this does not come through in the proposed architecture of Blocks 1, 2 and 3. While others are not. There is scope for this development to be high-quality and award-winning, but further development of facades is required.
- It appears that PV panels would be visible above building parapets. This is not acceptable and should be screened through a raised parapet. Ground level visual testing from the surrounding context is required to confirm whether PV panels would be visible.

Sustainability & Environmental Considerations

- The proposed cross-laminated timber (CLT) structural system is fully supported and the Applicant and design team are commended on the ambitious use of this system, which will radically reduce levels of embodied carbon caused by the development over a reinforced concrete construction.
- The anticipated Urban Greening Factor of 0.6 is fully welcomed. This is well in excess of the minimum level of 0.4 set by the GLA and shows a commitment to maintaining greenness, in recognition of the current qualities of the site.

Comments to revisions:

- While the proposed provision of bollards is supported, additional measures to limit children stepping onto the shared surface from play spaces are essential.
- The majority of standalone refuse stores are supported, given that these incorporate biodiversity measures. However, the location of the refuse store adjacent to the stair core of Block 3 is not supported, as it is directly beside the amenity terrace of Unit 26 and would create an unacceptable level of odour and nuisance for this unit. This store must be relocated to a more suitable location.
- Lower ground floor units suffer from reduced daylighting, however given their location and orientation, as well as the site topography in this location, there are few mitigation measures which can be put in place to remedy this situation. The lighting levels in these units is therefore acceptable.
- A number of concerns still exist regarding the internal configuration of Block 3.

- The refuse store adjacent to Unit 26 should be relocated.
- While glazed balustrades as proposed are accepted for south, west and east elevations, glazed balustrades to north-facing elevations are not supported in their current form. These should be made opaque or heavily translucent to limit actual and perceived overlooking between rear-facing amenity spaces and the gardens and dwellings of Pinner Road properties, whilst maintaining light levels to their respective units.

Comments to further revisions:

- The revised layouts for Units 27 and 28 are much improved and increase the amount of south-facing aspect to these units, as well as providing greater scope for cross (through).
- Associated updated elevations, which reflect this change to the ground floor layout and principally affect north and south elevations, are supported.
- Re: addendum to the Daylight and Sunlight Assessment for revised units 27 and 28. There are acceptable levels of daylight for these units overall. For sunlight, bedrooms to both units do not meet criteria, however this is deemed acceptable given the good sunlight levels for living/kitchen/dining spaces for each unit and would be difficult to achieve given the solely northern orientation of bedroom windows.
- The relocation of shared refuse stores away from the private amenity space of Unit 26 is supported and will improve comfort and quality of this unit for future residents.
- Block 2: Support changes made to window openings at ground and first floor levels including the addition of angled windows to some window openings to lessen actual and perceived overlooking from dwellings to the north of site.
- Block 3: Support changes made to window openings at ground and first floor levels including the addition of angled windows to some window openings to lessen actual and perceived overlooking from dwellings to the north of site.
- Approval of changes made to relocate refuse store from beside ground floor residential terraces.
- General: Support for angled window glazing details.

Secure by Design Officer

- Serious consideration must be given to crime and anti-social behaviour at the proposed development site.
- The plans for the buildings are well considered and if constructed as planned with the advised Secure By Design advice fully followed would achieve a high Secured By Design award.
- The only concern is the lighting on the path between the gate on The Gardens and the first block. This is the badger protection zone, however the lighting plan shows only 1 meter high bollard lighting on this footpath. Low bollard lighting has a recorded history of causing an unfounded fear of crime. The path lacks natural surveillance from any side, and could become an area which attracts criminal activity if not designed correctly taking into account

the needs of residence to use that footpath safely as well as the needs of the Badgers .

- A full list of Secured By requirements can be given to the developer once planning is approved. Advise the architects contact a Design Out Crime Officer to ensure that a secured by design accreditation can be achieved.
- A planning condition for Secured by Design accreditation is recommended.

Officer Comment: *Recommended measures are secure by conditions.*

Tree Officer

- The site contains dense bramble cover and has been subject to flytipping and disposal of household rubbish, mostly along the north side. TFL and Network Rail manage the trees bordering the railway line and a number of these trees have in recent years been removed and this area subject to vegetation clearance (for safety purposes and for arboricultural reasons owing to the condition of some of the trees).
- TPO 643 (confirmed 2000) covers the site and comprises a mixture of groups and individual trees. There are no A retention category trees included, the majority being either B or C retention category. The site also contains a large number of U category trees, these are trees which have a life expectancy of less than 10 years and require removal irrespective of any development proposals.
- Overall, there are no issues with the tree report.
- Under the proposals three B category trees (Birch T6, Sycamore T28 and Hawthorn T47) and one B category group (G5, Hawthorn and Prunus) will require removal to facilitate the development.
- A number of C category trees also require removal: 5 x Ash, 12 x Sycamore, 7 x Hawthorn, 3 x Poplar and 1 x Oak owing to their falling within the footprint of the development. Removal of a further group (G9) and partial removal of another (G8) is also necessary under the proposals. These trees are all C retention category and are primarily self-sown trees. As individuals they are relatively low-quality trees however it does represent a significant loss of vegetation and collectively they have greater value than as individual trees. There is however scope for mitigation planting with good quality, semi-mature tree planting and as part of a comprehensive detailed landscape scheme and aftercare / management programme.
- A number of trees require removal irrespective of the development: 7 x Prunus, 10 x Ash (all with early Ash dieback symptoms), 2 x Elder and 1 x Hawthorn are in poor physiological and structural condition. These are 'U' category trees meaning their retention (as living trees) is not feasible for longer than 10 years. This is from an arboricultural perspective and does not necessarily apply to any ecological / habitat value of dead/dying trees. One of the existing Ash trees – T31 (within G11 of TPO 643) has been given consent to remove/ monolith under application reference P/0376/23 (16/03/23). This tree has signs of Ash Dieback and has extensive decay

within the main stem and at the base. The tree is in poor condition and requires removal for safety reasons, irrespective of the development. The Ash is to be reduced to 6-8 monolith and retained for habitat.

- It was originally hoped that Sycamore T22, one of the more prominent and mature self-sown trees within the site, and which is situated close to the proposed access road, could be retained. This would usually be possible with the use of cellular confinement / no-dig surfacing, for use within the root protection area. However, the site constraints (level changes for one) and the end-use of the site, which would mean an access road passing underneath, and removal of companion trees and the dense ivy surrounding it, would leave the Sycamore exposed. The foliage is unbalanced owing to the ivy coverage – once removed this would leave foliage on the outer branches ('lion-tail') and furthermore its physiological condition (twin-stemmed / co-dominant trunks with included bark) is such that I would concur with the tree report's conclusion that in the long term, removal and replacement with a native species trees eg. Wild Service or Scots Pine, in a suitable location, would be appropriate here. A heavy standard tree (12-14cm girth) using underground anchoring system, and at least 3 years aftercare would be appropriate. I would suggest Scots Pine over other native species – these are not considered as 'high risk' in terms of potential subsidence or clay shrinkage issues and their form is such that they would be suited to more constricted spaces than, say, Oak or Beech.
- The trees being retained: Two category B trees – Oak T44 and Sycamore T42 are being retained as focal points within the development. There are opportunities here to improve the soil / rooting environment (decompaction via airspading, soil mulching etc) and for additional underplanting and other improvements – bat and bird boxes etc.
- It should be added that most of Harrow is on clay subsoil – shrinkable clay subsoil (ie susceptible to volumetric change) – planting should take this into account in species selection.
- Some RPA encroachment will be necessary in relation to the new access road and parking bays – suitable no-dig / tree root friendly design will need to be used to protect underlying roots re: Silver Birches T3, T4 and T5 and Oaks T44 and T63. RPA incursions are restricted to the hardstanding areas, no new building footprints fall within the RPA of these retained trees. Where levels are to be raised the use of stacked cell-web will be required, to reach the desired ground levels whilst allowing for gaseous exchange and retaining permeability. Both the new hard surfacing area and the kerbing/edging must be 'no-dig'. A detailed method statement based on the draft measures already outlined, can be conditioned as part of the approval.

Officer Comment: *Recommended measures are secure by conditions/S106.*

Landscape Architect:

- The site is a long and narrow strip of land located between the Chiltern railway line / London Underground Metropolitan line to the south and the

rear of 121 – 255 Pinner Road houses to the north. This submission has been subject to preapplication advice and input from the Design Review Panel (DRP) and Consultation. The LPA's recommendations for landscape have been incorporated within the current scheme and the layout appears to be well thought out and achievable, being both functional and attractive for future residents. The proposed landscape strategy has included consideration and incorporation of ecology, outside amenity and play on the way, trees and Sustainable Urban Drainage (SuDS). Subject to planning conditions and appropriate detail, the landscape should complement this development and there are no objections.

- The Landscape Strategy Plan dwg number 10707L.PP.001.Rev E together with the Outline Landscape and Ecological Management Plan (LEMP) provides a thorough scheme which addresses the site issues. The new building blocks, site infrastructure and necessary changes to levels result in the loss of trees and some habitats. The more significant trees are retained where feasible. Where it has not been possible to retain the existing trees, new tree, shrub, ornamental plants and rain gardens have been proposed to mitigate the loss and provide enhancements to the biodiversity.
- Several factors create challenges, with constraints and opportunities for development of this site, including the shape of the site and topography, with significant level changes. The site is regularly trespassed and has had ongoing issues with fly-tipping, contributing to a more unattractive appearance. The existing tree and scrub and vegetation cover, ecology, habitats and biodiversity, protected species and Japanese Knotweed have presented challenges. The site is mainly overgrown with ruderal vegetation, trees both planted and self-sown and two large stands of Japanese Knotweed which has and is currently being treated. Many of the trees are the subject of a Tree Preservation Order, covering single and groups of trees. There are no Grade A trees and only 13 of over 70 trees are Grade B. Many are low quality and self-sown, but the tree and vegetation cover contribute to the character of the site and the proposed landscape strategy seeks to retain as much of the existing vegetation as possible. This is however very difficult given the extent of the proposed development and the required changes to the existing levels.
- The Tree Officer will be able to provide detailed comments on the proposed tree loss and the trees to be retained.
- The landscape proposals incorporate a buffer zone of native planting along the northern boundary. This planting, over time, will grow sufficiently tall to soften the edge of the site between the proposed development and the neighbouring houses. The planting will not screen the proposed built development.
- To the south of the site, Transport for London own the adjacent land, with covenants attached restricting development within 5 metres of the boundary and, to allow for TfL access from Neptune Road via a

pedestrian gate to the trackside. These restrictions are incorporated into the design of the landscape masterplan.

- The central grassland space allocated for informal recreation and doorstep play along the way, adjacent to the access route, is welcomed. The available usable amenity space is however tight and narrow and would provide only limited use, since the incidental spaces are small. The play opportunities, such as balance beams, weaving poles and boulders, would reflect the proposed character and more natural appearance of the external space and a willow tunnel would add to the greenery while providing an appropriate play element. Careful consideration needs to be given to measures to ensure the children's safety, limiting children stepping out onto the shared surface. The residents would be heavily reliant on using the local park, Harrow Recreation Ground, in close proximity for outside amenity space and play facilities.
- The proposed sound attenuation fence, set out along the length of the southern boundary, would help to enhance the amenity space and also contribute to noise reduction for residents along the adjacent Pinner Road properties. The acoustic fence should help to separate the development site from the railway line to the south. The north elevation of the fence would be visually softened by planting climbing plants creating a green wall. The plants would need to be trained and this is proposed to be included in the management and maintenance of the site, which can be covered in a planning condition. The landscape softening to the southern side of the access road relies almost solely on the green wall, for about two thirds of the length, from the east up to mid-way level with Block 2, meaning the landscape planting is the minimum possible. It is therefore very important that the green wall survives and thrives, and the management, maintenance, monitoring and replacement planting should be included in the planning conditions.
- The site is tight and the building blocks have little available space around them, particularly on the northern and southern sides, to provide space for greenery. Sections of the building elevations have steel cables / mesh system to enable climber growth. This would partly help to soften the built form, but the building masses would still be apparent and highly visible.
- Species rich wildflower green roofs are proposed, to be established around roof mounted PV panels to create biosolar provision and bin stores have green roofs incorporated and these are welcomed. This will enhance the biodiversity and will require regular and ongoing management and maintenance to ensure success.
- Careful detailed design will be required to ensure the outside spaces are high quality, meaningful and functional, visually attractive and safe, with play elements set back sufficiently away from the access road.
- A comprehensive set of measures are proposed as part of the development proposals to safeguard badgers from potential harm, during construction and once the new development is operational. These are summarised in the Ecological Assessment and set out in detail in the

Outline Badger Mitigation Strategy. The Landscape Masterplan identifies a secure fenced parcel of land to be maintained, with a replacement artificial badger set. Foraging opportunities are retained and enhanced with areas of naturalised, species rich grassland, native shrub and fruiting species planting. The corridors for movement of animals is safeguarded and the provision of a locked pedestrian gate would help to secure the site and deter non-residents from cutting through to Neptune Road, and should minimise disturbance to the badger mitigation area. The future success of this will be monitored and if necessary reviewed.

- The landscape and ecology design has taken into account the existing habitats, flora and fauna on the site. Where it has been impossible to retain trees and site vegetation mitigation measures and habitat enhancements have been proposed for wildlife, including for badgers (noted above) and for birds, bats, reptiles, invertebrates and enhancements to the flora.
- The two stands of Japanese Knotweed have been identified on the site and must be eradicated, preferably before the start of construction works. Alternatively it might be possible to contain the stands of Japanese Knotweed within secure protective fencing, to prevent any access, and an eradication treatment programme put in place. There is a danger that the Japanese Knotweed could spread, if it remains on site during construction. A site survey to assess the Japanese Knotweed is required, and a Management Plan and Method Statement for guaranteed / warranted eradication. It would be preferable to eradicate the Japanese Knotweed before site preparation and construction works started.
- The Method Statement needs to explain in detail how the Japanese Knotweed is proposed to be treated, removed and eradicated, with a timetable, proposed method, drawings identifying, locating and detailing the method. Refer to the attached Environment Agency guidance document 2013 (which has been withdrawn by EA – the EA no longer provide advice on invasive species) and INNSA Code of Practice Managing Japanese Knotweed. The Japanese Knotweed eradication, including Method Statement and warranty can be covered by a planning condition.
- The London Plan Policy G5, Urban Greening recommends a target score of 0.4 for residential developments. An Urban Greening Factor Plan (dwg ref 10707L.UGF.002) has been provided. The UGF (Urban Greening Factor) has been calculated as just under 0.60, which exceeds the required target score of 0.4.
- Biodiversity Net Gain assessment has been undertaken and BNG Metric results calculated. It must be noted that the development will result in a loss of biodiversity on the site (- 51%) when applying the metric. This loss of biodiversity would be subject to an appropriate offsetting contribution, to be secured via a S106 legal agreement. The Biodiversity Officer will be able to provide comments on the BNG and UGF.

- An LEMP (Outline Landscape and Ecological Management Plan) has been provided and includes the ecological baseline and evaluation, management aims and objectives, monitoring and management responsibilities, five yearly review phasing, watering and a general management and landscape maintenance schedule of operations / calendar of tasks for year 1 and ongoing. This should ensure regular planned maintenance visits to keep the site in order for amenity and ecological purposes and that long -term benefits for biodiversity are secured. The LEMP provides sufficient information at this stage and the further detail required can be covered by a planning condition.

Officer Comment: *Recommended measures are secure by conditions/S106.*

Biodiversity Officer:

Summary:

Although there is a conflict with existing policy with regard to the loss of woodland, conditions could be set that would achieve adequate gain in support of nature's recovery in the borough, while safeguarding the resident badgers such that the scheme could then be considered to be providing sustainable development.

Details:

The development scheme would not impact a SINC but would result in the loss of woodland including established lowland deciduous woodland (a priority habitat). This generally wouldn't be supported.

Additionally, the site is along a rail line and forms part of a green corridor, providing a patch of valuable habitat value for wildlife in the context of the local area and contributes to the existing green corridor, despite long-term neglect, dumping and the presence of a significant quantity of Japanese knotweed. The site lies within a major area of deficiency in access to nature. However, the site itself affords residents little access to nature, and is only likely to decline further under existing circumstances.

The development site comprises made land, former rail sidings alongside the Metropolitan Railway line. The majority of onsite vegetation (woodland and scrub species) are likely to have been present in one-time farm hedges or along the roadside and easily spread by wind or bird, with subsequent arrival of non-native plants from adjacent gardens or in the case of the Japanese knotweed, translocated along the rail line.

Aerial imagery confirms that trees and scrub along the line have been cut back at intervals, probably more than once since 2019. This includes a 2-metre-wide strip within the southern margin of the development site, cut over the autumn/winter of 2019/2020 by TfL. Such cyclical intervention necessarily imposes limits on the potential long-term habitat value, but encourages greater

diversity in structure, plant diversity and opportunities for other species in the green corridor along the length of the rail line. This also emphasises the existing value and potential offered by a relatively undisturbed, broader area of trees and scrub for birds, bats and other species, that is otherwise lacking along the line's margins in this area.

It would appear that the regrowth has been strimmed back more than once, perhaps to keep open the access which the clearance provided. Regrowth may also be affected by periodic treatment of Japanese Knotweed.

The **Ecological Assessment Report** presents information on survey work undertaken by Ecology Solutions in 2022 and earlier works in 2020-21 by Corylus Ecology. Some of the faunal earlier surveys were not undertaken at optimal times - probably reflecting when the consultants were commissioned - although these vary between species.

Whilst lacking the coverage and depth to provide details as the numbers and species of birds which presently breed here, or the numbers of reptiles supported on site, with only the follow-up badger work in 2022 adding to the faunal surveys in 2020-21, it is considered that the extent and nature of the survey works undertaken provide a proportionate, sufficiently robust basis for the evaluation of the site and the submitted proposals. Any conclusions, assertions and proposal should be assessed with reference to the inevitable limitations of the supporting evidence.

The **Outline Landscape and Ecology Management Plan** provides a useful basis for a more detailed document to be drawn up in the event that the development is permitted.

The UGF assessment uses the GLA's UGF calculation tool, although the biodiverse green roof has been incorrectly assigned to the intensive green roof category rather than that for an extensive green roof. The UGF score needs to be corrected from the stated 0.5975 to 0.5883. For the purposes of this application, the corrected figures easily exceed the UGF requirements.

However it should be highlighted that the UGF was developed more to drive the greening of heavily built-up locations with little or no vegetation, rather than to support a reduction in vegetated cover as would be the case here, where the existing UGF index is likely to exceed 0.95

Biodiversity Net Gain

Since 2019 the Council has set a target of a 20% uplift in overall biodiversity value, applying the Metric requirements in relation to habitat replacement or substitution with regard to the protection and enhancement aspects of the existing local plan policies DM20 and DM21. Additionally, a minimum areal target equivalent to 2 b.u. per hectare has been applied to help ensure that brownfield development will incorporate a degree of natural greening, contributing appropriately to urban greening and coherent green infrastructure.

The BNG valuation since provided gives a baseline of 6.14 b.u. with the site's 0.76 ha. Based on the above this is considered to be an appropriate valuation equating to a per hectare value of 8.08.

Were the development to be permitted, there would be a loss of 5.59 units (91%) of the existing biodiversity value of the site, with what remains beyond the Badger Protection Zone concentrated in small pockets, mainly comprising trees and their protected root areas. This can be contrasted with the near total loss of existing biodiversity features, other than a half-dozen retained trees, under the withdrawn scheme.

It should be noted that whereas the presented figures assume retention of existing features within the BPZ this might not be the case, depending on the impact of the works associated with the installation of the artificial sett. Separate appraisal would be needed and adjustments made to figures.

The proposal is further complicated by what vegetation might be planted or permitted to grow without significant intervention within the area in which TfL will be seeking to ensure that vegetation poses no operational risks. This would have particular significance in relation to a number of retained trees and the BPZ.

Previous advice appears to have been taken on board in general, with no exaggerated claims as to the condition of what would be provided. However, because of edge effects, and in the case of the green wall provision, it is not clear that the aspirations will be achieved. Other details should be further amended.

Badgers /BPZ

No badger signs were recorded during a site visit by the Borough Ecologist in 2018 or in the course of the PEA survey in 2016. The first definite records seem to have been from 2020. Badgers were active in the area of the West Pinner (Large) Allotments site at that time and it was reported that a badger sett had been blocked off on adjoining land. It is possible that badgers moved to here from there or from elsewhere along the rail line in 2019.

The current proposal to create a badger protection zone (BPZ) around a new artificial sett, retaining existing vegetation where practicable is more sympathetic and a better prospect than the previous proposal.

It is assumed that the resulting works will have some impact on vegetation in the BPZ but that if this would affect BNG figure, any agreed offsetting arrangements will need to be adjusted accordingly. In practice, this is only likely to be necessary if installation of the sett would necessitate tree removal or extensive vegetation clearance.

Subject to Natural England's evaluation, I consider that provided appropriate measures are implemented in relation to the path and fencing and the provision and management of vegetation with the BPZ it would stand a reasonable chance

of being successful in providing a long-term home for badgers where more deliberate disturbance or other illegal activities would be much less likely.

For the longer term, incorporation of management activities for the BPZ within the wider LEMP would be required. Were the badgers to vacate the premises after the main phase of construction begins, the BPZ should continue to be managed in accordance with the provisions identified via any Natural England Licence or otherwise incorporated within the LEMP.

Green roofs

The general incorporation of biodiverse green roofs is welcome, contributing significantly to on-site mitigation. Since not all of the green roof areas will be bio-solar, it is strongly suggested that more than one type of seed mix be incorporated so that these can be treated differently, deepening the minimum substrate level and including a higher proportion of species that are drought tolerant. In the absence of any ground level water features, some of the roofs should also include the provision of ephemeral pools.

The necessary details about the green roofs are lacking. Any planning permission should be subject to a pre-commencement condition which should also require demonstration that what would be acceptable can be achieved within the roof load-bearing tolerances of approved building designs.

Invertebrates - Any final Landscape and Ecology Management Plan should provide more definite information in relation to invertebrate species. This particularly includes shelter features provided in conjunction with the green roof areas. The LEMP should consider invertebrate needs and provide clear instructions in relation to the management of the habitat areas - working within the constraints.

Shelter - Provision should be on the basis on one single or multiple occupancy wildlife shelter per residential unit. This would need to be secured by a pre-commencement condition in order to ensure that any conflict in placement or materials choice would be avoided.

Off-site provision: Once the onsite contribution and any potential measures at the allotments have been accounted for, the greater part of the offsetting requirements to meet the Council's expectations would need to be delivered elsewhere. Some of what is required would need to be of the same or greater distinctiveness than what is to be lost and some would need to directly address the provision of lowland broad-leaved woodland. A strategically-located woodland creation site has been identified and use of this in offsetting the developers' obligations has previously discussed with their consultant. Were the development to be approved, this is the approach that the Council would propose, with part of a S.106 agreement securing funds against the creation and long-term maintenance of the required number of biodiversity units, the Council

assuming responsibility for their provision and ongoing management/monitoring of the planned habitat bank.

Taken in the round and subject to

- (a) Natural England granting a licence to close the existing badger sett based on the submitted mitigation proposals and any subsequent modifications;
- (b) Reappraisal and modification of the landscaping proposals and revision of the BNG assessment as appropriate;
- (c) Agreement to fund mitigation and gain through habitat creation at other sites in Harrow in accordance with the Council's existing approach;
- (d) Delivery of the scheme as proposed, subject to (a-c)

The overall result should be provision of a new development incorporating a range of positive measures which, whilst reducing the degree of green infrastructure on site provides a secured, by-design BPZ, and increases species diversity and foraging and shelter opportunities locally whilst supporting positive measures to support nature's recovery in Harrow.

Officer Comment: *Suitable conditions/S106 obligations to address the issues above have been attached.*

Natural England

- No Objection
- Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes
- We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

Fire Consultant:

- With regard to the vertical means of escape it is noted that an evacuation lift is to be provided for each of the blocks.
- It is also noted that in the same section of the report that refuges are proposed. This is incorrect, guidance for the provision of evacuation lifts in BS 9999:2017 that where evacuation lifts are provided dedicated refuges with hard-wired communications should also be provided.
- The relevant provisions of for evacuation lifts are given in annex g of BS 9999, what they are proposing does not follow the British Standard.
- Noted that the current standard (BS 9999) is a design and build document for commercial buildings. While updated guidance is due to come out soon, this is the only current standard in force.
- Developers and designers therefore need to consider introducing a concierge facility.

- If you accept what they are suggesting it could mean that in an emergency someone with a disability will be fending for themselves.
- A condition could be considered; however, note that we would interpret the wording of Policy D12.B to require adherence to current standards not future ones.

Comments to revised documents:

- Points that require clarification:
 1. In form 3 Provision of lift documents mentions that residents will be offered evacuation training to ensure that there will always be adequate responsible people onsite. This was not advised due to the question of liability.
 2. The document outlining the operation of the communication system to be used with the lifts does not make clear that the system can be operated from within the lift car, so this will need clarification.
- Aside from the above, the rest is satisfactory.
- Further revised documents (Rev C) are acceptable

Environmental Health Officer:

Air Quality and Contamination:

- Having reviewed all of the documents and been provided with additional clarification by the consultants, as long as the development continues in line with the assessments and proposed mitigation schemes outlined below, I have no objections to the development.
 - 1) Air Quality assessment mitigation scheme set out in table 16 page 24 of the report (relating to construction management of dust and particles).
 - 2) Contaminated Land report, The report identifies a couple of issues and recommends further intrusive sampling but from additional information it seems the applicant proposes to go further than the recommendations of the report and dig and dump a significant level of soil. In order to be clear, we would like to see a final method statement detailing the proposed work any specific areas of concern, the extent of the soil to be removed and details of analysis of the replacement topsoil.
 - 3) In addition to a statement of commitment to achieve or better the mitigation proposed by the above reports I would also like to see a condition requiring a completion certificate to provide assurance that the development has been undertaken in accordance with them

Noise:

1. Methods: BS 8223:2014 Guidance on sound insulation and noise reduction for buildings (BS 8233) is used but no reference to the more specific Department of Transport Calculation of Rail Noise (CRN) 6 publication, which covers more readily the monitoring of frequent passes of a noise source (i.e. train). Please advise if this CRN was considered and how this was resolved.

2. Please advise if any night time monitoring was undertaken and reasons if not. If there was – please provide the reference in the report and what use the night time monitoring was put to.
3. The baseline conditions for noise and vibration (no definition for baseline – presuming this is “background” noise level – please confirm) were obtained during COVID-19 Pandemic, between lockdown periods July 2020 – and it is explained that there should be no difference in relation to train running schedules that there are now. Please can evidence be provided of this.
4. Position of baseline condition noise equipment point is queried since it is not near most sensitive receptor or presentative position. Please can you advise also where the vibration equipment was positioned. Please refer to relevant British Standards to validate points.
5. No noise impact assessed for the residents already there on Pinner Road, in relation to this development going ahead and when it is in situ. Please advise why this was not done.
6. Issues with overheating and levels of 5db over the required level for noise – will occur, says report – but seen as acceptable as long as occurrences are minimised – not satisfactory mitigation. Is any further explanation on this.
7. Reliance on use of MVHR units to some occupancies - even though quote the benefits of being able to open windows – and should be available for the proposed occupiers. Also, no assessment of the noise loading inside by the MVHR unit has been done and required (as flagged by report itself). But then highest LAFmax on the southern façade of block 1 – apparently standard glazing and trickle vents are satisfactory. Please give detail to explain these queries.
8. Balconies most exposed to rail noise (Block 1 South Elevation) – 57db as opposed to 55db which is the limit required by the BS 8233 – which they say is obtainable with a solid glass balustrade – as long as the occupiers are sitting down. Not satisfactory mitigation, although would be happy to receive any further explanation.
9. Would like a plan to be absolutely sure what is meant by “entire Southern boundary” ref noise barrier location.
 1. My conclusion would be that the noise report is not satisfactory at this stage and that in turn noise, in particular, and vibration from the nearby railway will unduly effect future occupants of this development. In addition, there has been no assessment of the development’s effect on the current residents / properties.

Comments to revised documents (Noise):

Supplemental report has concentrated on noise measurements.

- Their conclusion was overall measured levels are indicative of a robust data set and levels are typically 3-4dB lower than the previous survey conducted in July 2020.
- That can be aligned that with the vibration part being still satisfactory within the original report – bearing in mind undertaken in between two lock downs – and on which we were critical of.
- If this is acceptable to the LPA, any other relevant eventualities could be covered with a condition or informative with regards vibration being monitored and any adverse results being dealt with and resolved in a proper manner and in relation to relevant Standards, if notification is received within the first 12 months of occupation.

Officer Comment: *With regard to Point 5 above (noise assessment on nearby residential properties), as the development is for residential properties (rather than an industrial, business or other “noise-generating” use), such an assessment is not required. See paragraphs 6.5.10- 6.5.11.*

HSE

- No concerns to raise with regards to this (re: hazards/contamination on site).

National Planning Casework Unit, DCLG

- No comments received.

Historic England

- We do not consider that it is necessary for this application to be notified to Historic England under the relevant statutory provisions.

NHS

- We have reviewed the online documents and have used the information to run the HUDU model. NHS NW London ICB would like to request a capital contribution of £115,686 to contribute towards the development of local healthcare facilities within a 1.5 mile radius, to mitigate the population increase brought to the area as a result of the proposed development.

Officer Comment: *The HUDU model has been superseded by the Community Infrastructure levy (CIL) system. Thus, the HUDU payment above cannot be applied, instead the development will be liable for CIL, should it be granted.*

Campaign for a Better Harrow

- No comments received.

Thames Water

<ul style="list-style-type: none"> • No comments received.
<u>Affinity Water</u> <ul style="list-style-type: none"> • No comments received.
<u>EDF Energy</u> <ul style="list-style-type: none"> • No comments received.
<u>National Grid</u> <ul style="list-style-type: none"> • No comments received.
<u>Department of Transport</u> <ul style="list-style-type: none"> • No comments received.

5 **POLICIES**

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that:

‘If regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the Plan unless material considerations indicate otherwise.’

5.2 The Government has issued the National Planning Policy Framework [NPPF 2023] sets out the Government’s planning policies for England and how these should be applied and is a material consideration in the determination of this application.

5.3 In this instance, the Development Plan comprises The London Plan 2021 [LP] and the Local Development Framework [LDF]. The LDF comprises The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan 2013 [AAP], the Development Management Policies, Local Plan 2013 [DMP], the Site Allocations Local Plan [SALP] 2013 and Harrow Local Area Map 2013 [LAP].

5.4 A full list of all the policies used in the consideration of this application is provided as Informative 1.

6.0 ASSESSMENT

6.1 The main issues are:

- Principle of the Development
- Affordable Housing, Mix and Tenure
- Character of the Area and Design
- Residential Amenity
- Traffic, Parking and Servicing
- Flood Risk and Drainage
- Ecology, Landscaping and Biodiversity
- Energy and Sustainability
- Fire Safety
- Air Quality and Contamination
- Statement of Community Involvement
- Planning Obligations

6.2 Principle of Development

6.2.1 The relevant policies are:

- The National Planning Policy Framework (2023)
- Harrow's Core Strategy (2012): CS1.A
- London Plan (2021): H1, E11

Principle of Redevelopment for Residential Use

6.2.2 The site is not designated as any form of protected land (although it may have been in the past); and a historic application for a wildlife reserve does not appear to have been implemented. There is therefore no designated use or protections on this site, and no policy impediment to development of this site for housing.

6.2.3 The previous application ref: P/3450/21, which proposed a similar development but with a greater number of dwellings, was considered to be acceptable in principle, but was withdrawn primarily due to issues arising from the presence of badgers on site and with regard to biodiversity net gain.

6.2.4 The proposed development would provide a meaningful contribution to the boroughs housing stock, which would assist the borough in meeting its London Plan (2021) target of 802 homes per year. Furthermore, the planning application proposes to provide affordable housing which would be compliant with the London Plan and local policies and guidance in terms of type and quantity. Subject to approval of the specific details of that affordable housing provisions (see below) and an early-stage review mechanism which will be required to be secured by way of a S.106 obligation, this would be acceptable.

- 6.2.5 It is acknowledged, however that the site does comprise an informal green space which does provide valuable amenity and habitat to the local area. Thus, the acceptability of the scheme depends on ensuring the biodiversity matters are appropriately and robustly addressed.
- 6.2.6 Having regard to the London Plan (2021) policy H1 and the Council's policies and guidelines, it is considered that the principle of the proposal is acceptable., subject to further consideration of the biodiversity/ecology, affordable housing provision, and other material matters.
- 6.2.7 The proposal does not include any employment provision; however the permission will be subject to a S106 agreement which will include provisions for a training and employment plan including local employment and supplier targets.

6.3 Affordable Housing, Mix and Tenure

6.3.1 The relevant policies are:

- The National Planning Policy Framework (2023)
- Harrow's Core Strategy (2012): CS1.I/J
- London Plan (2021): GG4, H4, H5, H6, H10
- Harrow Development Management Policies (2013): DM24, DM50
- Mayor of London Affordable Housing and Viability Supplementary Planning Guidance (2017)
- Supplementary Planning Document: Planning Obligations and Affordable Housing (2013)

6.3.2 Affordable Housing is detailed in the National Planning Policy Framework (2021) as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the definitions within the following: affordable housing for rent, starter homes, discounted market sales housing or other affordable routes to home ownership (including shared ownership). The proposed development triggers an affordable housing requirement as it constitutes a major residential development.

6.3.3 The proposal would provide 10 affordable units (comprising 37 habitable rooms), of which 6 are social rented units (25 habitable rooms), and 4 are intermediate units (12 habitable rooms). This amounts to 35.5% of the total housing (by habitable room).

6.3.4 Policy H4 of The London Plan sets out a strategic target for 50% of all new homes delivered across London to be genuinely affordable. Policy H5 sets out the "threshold approach" to affordable housing, whereby applications which meet or exceed 35% affordable housing on certain sites would not, *inter alia*, be required to provide a viability assessment. Having regard to Harrow's local circumstances, Policy CS1(J) of the Core Strategy sets a Borough-wide target

for 40% of all homes delivered over the plan period (to 2026) to be affordable, and calls for the maximum reasonable amount to be provided on development sites. In terms of dwelling mix, London Plan Policies makes reference to the priority that should be accorded to the provision of affordable housing. Policy DM24 of the Development Management Policies requires development proposals to secure appropriate mix of housing on site and to contribute to the creation of inclusive and mixed communities, having regard to the target mix for affordable housing set out in the Councils Planning Obligations SPD. Considerations include the priority to be afforded to the delivery of affordable family housing, the location of the site, the character of its surroundings and the need to optimise housing output on previously developed land.

- 6.3.5 In terms of tenure split, Policy H6 of the London Plan requires a minimum of 30% of homes to be affordable rent or social rent, 30% to be intermediate products which meet the definition of genuinely affordable housing, and the remaining 40% to be determined by the borough as low cost rented homes or intermediate products. At a local level, Harrow's planning obligations require that the Affordable units are split by tenure: 70% London Affordable Rent (LAR) to 30% London Shared Ownership / Intermediate units.
- 6.3.6 The proposal meets the criteria for the threshold approach under Policy H5, and as such no Financial Viability Assessment (FVA) has been submitted.
- 6.3.7 The Council's Policy officer and Housing officer have reviewed the proposed details, and agree that the provision is compliant with London and local policies, and would be acceptable in terms of affordable housing provision. It is noted that the 7 Affordable Rent units are located in Block 2 and do not share a core with private units, while the Intermediate units are located in Block 3, thus the arrangement is also compliant with the Borough's needs in this respect.
- 6.3.8 On the basis of the above, the proposal would be acceptable in terms of Affordable Housing provision, subject to an early stage review mechanism, to be secured by way of a S.106 obligation, as per the GLA's guidance. The Affordable housing units, including wheelchair adapted units, will also be secured as part of the S106. This has been included within the heads of terms for the scheme.

Housing Mix

- 6.3.9 The London Plan policy H10 encourages new development to offer a range of housing choices in terms of mix and housing sizes and types. This is reinforced by Core Strategy Policy CS1.I which requires new residential development to promote housing choice to meet local needs and to maintain mixed and sustainable communities. Development Management Policy DM24 states that "the appropriate mix of housing will be determined having regard to the location of the site, the character of its surroundings and the need to optimise housing output on previously developed land."

- 6.3.10 The mix of housing provided for Affordable Housing, is satisfactory, as noted above. In terms of the private units, the mix is comprised of 1 and 2-bed units, with the proportion of 1-bed units being particularly high. However, as these comprise private market units, and given the satisfactory mix otherwise, the proposed mix would, on balance, be acceptable.
- 6.3.11 The scheme would on balance meet the strategic housing aim for the borough and accord with policies H4, H5, H6 and H10 of The London Plan (2021), Policy CS1.I/J of the Harrow Core Strategy, policies DM24 and DM50 of the Harrow Development Management Policies Local Plan (2013), the Mayor of London Affordable Housing and Viability Supplementary Planning Guidance (2017), and the Supplementary Planning Document: Planning Obligations and Affordable Housing (2013).

6.4 Character of the Area and Design

6.4.1 The relevant policies are:

- The National Planning Policy Framework (2023)
- The London Plan (2021): GG2, GG6, D3, D11
- Harrow Development Management Policies (2013): DM1, DM2, DM12, DM22
- Harrow's Core Strategy (2012): CS1
- Mayor of London Housing Design Standards (2023)
- Supplementary Planning Document Residential Design Guide (2010)
- Supplementary Planning Document: Tall Buildings (Building Heights) (2023)

Planning Policy Context

- 6.4.2 The proposed development would not constitute a tall building as defined by the London Plan (2021). Notwithstanding this, an assessment of scale and mass (including building heights) has been conducted against all adopted and relevant guidance.
- 6.4.3 Harrow Council has now adopted the Tall Buildings (Building Heights) Supplementary Planning Document (SPD), which provides further guidance to Policy DM1 (Achieving a High Standard of Development) of the Harrow Development Management Policies Local Plan (2013). The Building Height SPD is intended to assist applicants in determining what would constitute a contextually tall building across Harrow. The Building Heights SPD would not conflict with the requirements as set out in Policy D9 (Tall buildings) of the London Plan (2021). Under this SPD, a contextually tall building is one that is equal to or greater than twice the prevailing height. For North Harrow, the prevailing height is considered to be 2 storeys. Given the change in ground levels on this site, all three buildings of the proposal consist of 3 storeys along the southern elevations, but include a lower ground floor level along the northern side, bringing them to 4 storeys. As per the SPD, then, the proposal

would form a contextually tall building. As such, it must relate to the existing pattern of development, be proportional to local prevailing heights, and adhere to a number of design principles. These are addressed in the sections below.

Context and Site Layout

- 6.4.4 The site is very constrained, as it is narrow but long, with access points only at either end, and changing ground levels throughout the site. The presence of TPOs and badgers on site must be considered and incorporated into the design approach. In addition, a strip of land along the southern boundary is subject to restrictions from TfL, which disallow building works within 5m of this boundary, and control the vegetation within a 2m distance of the boundary (including removal and , in order to ensure no interference with services. Such works have been undertaken by TfL within the last two years.
- 6.4.5 The primary entrance to the site is from Neptune Road (at the eastern end), where site levels are relatively equal to the surrounding roads. A series of three buildings are proposed in a linear arrangement along a gently curved road terminating at Block 1. A pedestrian path would then connect through to the western site boundary with The Gardens, and where there is a significant drop in ground levels between northern part of the site and the street. This creates site permeability and a link with the nearby public transportation options, thus increasing sustainability and functionality.
- 6.4.6 The siting of the artificial sett at the western edge is considered appropriate, as it would be somewhat secluded from activity on the rest of the site, provided that the pedestrian pathway is sensitivity designed and implemented.
- 6.4.7 Three blocks would be constructed across the site. Block 1 (to the west, closest to the Badger Zone), is a maximum of four storeys and contains 16 private tenure apartments. Block 2 contains 7 affordable housing units, with a maximum height of four storeys. Block 3 contain 14 units which would be a mix of private and intermediate tenure, and would be a maximum of four storeys high. Due to the topography of the site, the heights vary depending on where they are measured from, and the blocks all have lower ground floor elements, facing north.
- 6.4.8 The footprint of the individual proposed buildings is increased in comparison to the previous proposal, but the number of buildings is reduced to 3 buildings from four. The revised footprints are acceptable, as the buildings maintain a reasonable amount of space with the boundary and with each other (subject to detailed consideration of ecological matters).
- 6.4.9 Taking into account the constrained nature but large size of the site, it is considered by the Urban Design officer that a development of three blocks comprising 37 flats would provide a good level of density without risking overdevelopment or significant overbearing to surrounding sites.

Scale, Massing and Design

- 6.4.10 The surrounding residential properties are primarily two-storey houses. The recent development of flats along The Gardens (nos. 62-66) is three storeys inclusive of habitable roof space, and closer to the existing properties. The proposed development is set within a generously large (albeit narrow) plot, with significant setbacks from all nearby buildings. In addition, the site levels mean that the properties appear as 3-storey blocks from the south. (It is noted that the previously withdrawn scheme ref: P/3450/21 included building heights of 3-5 storeys; the 5-storey building has been omitted and Block 2 and 3 have been increased by one storey each.)
- 6.4.11 The overall height and size of building footprints for all blocks are supported and is considered to present a limited level of overbearing to rear gardens to the north of the site, given the distance from the rear of these houses. Development is well set back from both The Gardens and Neptune Road and will have minimal impact on the street scene of these road; and good distances are maintained from rear elevations of Pinner Road properties and the north elevations of proposed blocks.
- 6.4.12 The scale of the blocks are considered appropriate. Given the topography changes within the site, the buildings will appear from rear gardens of Pinner Road as 4 storeys, although it is noted that the lower ground floors sit at approximately the level of the existing boundary treatments and would be significantly screened. From within the site or adjacent railway (south elevation) Block 2 and 3 will appear as 3-storey buildings as the adjacent communal areas are on the higher ground. The third floor of each building is inset and has a much smaller footprint compared to floors below, appearing highly subservient when compared to the rest of the building massing. This reduces actual and perceived massing, as well as ensuring that overbearing impacts are avoided.
- 6.4.13 Within this context, there is considered to be sufficient setback and separation from existing dwellings to warrant the proposed height on site to a maximum of four storeys; while the relative size of the building footprints relative to the site's area allows generous area for the setting of the buildings and retaining significant amounts of green landscaped area. The development would be considered acceptable in this regard and when considered as a contextually tall building.
- 6.4.14 Lift overruns are shown on the plans, as are the relative heights of PV panels which are partially screened by parapets. The resulting roofscape would not be considered obtrusive.
- 6.4.15 The Urban Design officer raised specific concerns with regard to Blocks 2 and 3 relating to the internal layouts of some units, design (including fenestration) of northern and southern elevations, the need to maximise the use of the southern elevation, and creating additional visual interest on the northern elevations of these blocks. Revised plans have been provided which the Urban Design officer found acceptable. Additional concerns were raised by

planning officers regarding the level of overlooking to the gardens of the properties along Pinner Road, adequate light and outlook for future occupiers (in particular for north-facing aspects) and minor details of the internal layout. Further revisions have been received which address these points, including the use of oblique angled windows for bedrooms on the northern elevation, reduction in size of other (secondary) windows, and re-location of balconies to the southern elevation. It is considered that these amendments have addressed the issue of overlooking and loss of privacy and the development can now be considered in compliance with relevant policies on this point.

- 6.4.16 The north elevation of all proposed blocks initially raised concerns due to a lack of visual interest, which is of particular concern due to their facing the rear gardens of the houses along Pinner Road. It is noted that in order to address the overlooking issue, the fenestration on northern elevations has been limited, and this results in a more plain façade that would otherwise be sought. Revised plans submitted for Blocks 2 and 3 are considered an improvement; and green walls would be proposed for some elevations, which would help create visual interest and amenity. The Urban Design officer also considers that the use of a red/brown metal cladding to the uppermost storeys and lift overruns successfully terminates the blocks and provides visual interest, as does the use of other materials such as timber cladding details. Projecting course panels in the brickwork are also used .
- 6.4.17 The proposal for a cross-laminated timber-based structure for the development is fully supported by the Urban Design officer. The proposed external material palette, with brick being the primary external material.
- 6.4.18 Subject to a condition for details of materials (attached to this permission), which would ensure the development is done to a high degree of quality, as well as other conditions ensuring the green walls are implemented and maintained, the external appearance of the buildings is considered satisfactory.

Secure by Design

- 6.4.19 The proposal has been reviewed by the Secure by Design (SbD) officer, who has had direct consultation with the applicant prior to the submission of the application, which informed the design presented here. The SbD officer considered that the design of the proposal is overall well considered and, if constructed as planned with the Secure By Design advice fully followed, would achieve a high Secured By Design award. A condition to ensure that the development achieves a Secured by Design accreditation to ensure measures are in place to reduce opportunities for crime and disorder is recommended. However, the SbD officer has raised a concern with regard to the lighting along the pedestrian path between Block 1 and the access to The Gardens. This is dealt with in details in the “lighting” section below.
- 6.4.20 No concerns were raised regarding negative impacts to the security of the railway, so far as Secure by Design and planning matters go; nor have any concerns regarding security been raised by TfL. There is no basis to consider

that the development would increase crime or anti-social behaviour in the area. As the site would be brought into active use, and would introduce passive surveillance, as well as having controlled access to the site, it would be more likely to help reduce crime occurring on the site or affecting adjacent properties. The SbD officer has not raised any concerns regarding increased security risks to adjacent sites or the creation of generators of anti-social or criminal activity, including drug use.

Access

- 6.4.21 The proposal would utilise the existing vehicle access off Neptune Road (on the eastern end of the site). The gated and fobbed vehicular access point to the east of the site is supported by the Urban Design officer.
- 6.4.22 The western pedestrian access route to The Gardens is required for the best functionality of the site, but must be well-lit (without compromising the adjacent badger protection area), given it lacks much passive surveillance, with no buildings adjacent to it. A gated and keyed, resident-only access system is supported. Both access points would be therefore controlled; which would control and limit access into the site (and addresses concerns raised by adjacent residents in this regard). Although “gated” communities are generally avoided under current planning policy, given the specific site circumstances here, including the significant distance of the buildings from the access points and the need to minimise disruption to the BPZ, this approach is considered appropriate for this development.

Bin Store Appearance

- 6.4.23 The bin store for Block 1 is located internally; while for Blocks 2 and 3 external stores are used. The proposed external stores include sedum roofs and “bug hotel” features, and are considered to contribute positively to the site’s biodiversity for this reason. The original location of the communal bin store for Block 3 was not supported, as it was too close to the amenity space for one of the units. This has now been revised to a more appropriate location.

Landscaping and Trees

- 6.4.24 As noted above, the site includes an “exclusion” zone along the boundary with TfL, which enables TfL to control, and when necessary, cut or remove, the vegetation that grows adjacent this boundary to prevent interference with rail services. As such, the type of plantings that can be implemented as part of the landscaping along this boundary are limited to those which would be allowable by TfL. This has been accounted for in the landscaping plan.
- 6.4.25 As the landscaping in this case is integral to the biodiversity matters, landscaping is dealt with in more detail below under “Ecology, Landscaping and Biodiversity”. For the purposes of considerations of character, layout and appearance, it is noted that the proposal would remove much of the existing vegetation on site; and would provide for extensive landscaped areas around

the buildings and BPZ. Additional landscaping is provided on features such as roofs, walls and fences, increasing the visual amenity on site. The overall layout of the hard and soft landscaping is broadly supported, subject to additional considerations as set out elsewhere in this report.

Lighting

- 6.4.26 The proposed lighting strategy is broadly supported and addresses pedestrian access from the east and west of the site, as both routes are not well-overlooked.
- 6.4.27 The proposal utilises three types of lighting. Column mounted lighting (4m high) is used along the access road and vehicle parking areas. Wall-mounted lighting is used along the fronts of the buildings to light the entrances and access. Bollard lighting is used along the pedestrian pathway between Block 1 and the access to The Gardens.
- 6.4.28 The use of lighting adjacent the Badger Zone is not ideal. However, the use of low-level bollards helps to reduce the amount of overspill light; and it should be noted that the bollards will be on lower ground level than the Badger Zone due to the site's ground level changes, which will also limit light spill. The applicant also states that the lighting proposals have also been made in accordance with the ILP guidance for Bats and Artificial lighting. The applicant further noted that boundary treatment, such as trees and bushes, have not been modelled and will further reduce light spill to the surrounding environment.
- 6.4.29 The Secure by Design officer has raised concerns that the lighting along this pathway should be increased and should not be limited to low levels, especially given there is limited natural overlooking to this area. However, this would conflict with the needs of the Badger Zone. As the access at both ends of the site is controlled, the pathway would not be open to the general public which would limit users to primarily, future occupiers of the site. On balance, then, it is considered that the proposed lighting in this area would be satisfactory. A condition is attached to this permission for finalised details of the external lighting strategy, which would also ensure light levels would not cause any nuisance to future or adjacent occupiers. Subject to such a condition, the external lighting is satisfactory.
- 6.4.30 The site is constrained and presents several challenges, however it is considered that the proposal would represent an appropriate form of development and layout for the site. The scale and massing of the buildings retains generous amounts of landscaped areas to provide an appropriate setting, and given the separation distance from adjacent properties and changes in levels, the relationship of the buildings to its surrounding context, including its relatively heights, is considered to be acceptable, subject to the above noted conditions.

6.5 Residential Amenity

6.5.1 The relevant policies are:

- The National Planning Policy Framework (2023)
- The London Plan (2021): D3, D5, D6 D7, D11, D14, S4, SI 4
- Harrow Development Management Policies (2013): DM1, DM2, DM27, DM28
- Harrow's Core Strategy (2012): CS1
- Technical housing standards - nationally described space standard (2015).
- Mayor of London Play and Informal Recreation Supplemental Planning Guidance (2012)
- Mayor of London Housing Design Standards (2023)
- Mayor of London Affordable Housing and Viability Supplementary Planning Guidance (2017)
- Supplementary Planning Document: Residential Design Guide (2010)

Impact of Development on Neighbouring Amenity – Nos. 121-255 Pinner Road

6.5.2 The most directly affected neighbouring residents of the development would be the directly adjoining properties, nos. 121-255 Pinner Road. The proposed development would introduce 3 no. buildings up to 4 storeys high to the application site, across part (but not the whole) of the boundary along these properties. Although these neighbouring properties have relatively long rear gardens, which provides some buffering with their main living areas, the gardens are nonetheless private amenity space for these residents which must be considered.

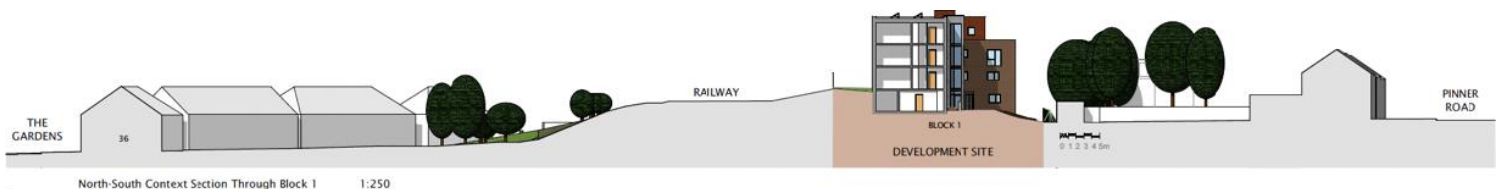


Figure 1: Contextual Cross Section of Block 1 (with The Gardens on the right, and Pinner Road on the Left)

6.5.3 With regard to visual impacts, the buildings would be sited between 17-30m distant from the rear elevations of the existing houses. For reference, a distance of approximately 18m is generally considered sufficient in suburban areas within the borough to effectively mitigate impacts of a development on adjacent properties. Additionally, some of the rear gardens do have outbuildings/structures in their rear gardens which would partially screen parts of the development. The use of landscaping along the boundary to help buffer between the development and these properties does assist to some degree, but cannot be fully relied on and does not fully mitigate the visual impacts on its own. The proposal would not contravene the Council's 45-degree code, which aims to ensure visual and overbearing impacts are minimised.

- 6.5.4 In addition, the proposal would utilise green walls on some of the northern elevations which would soften the appearance of the buildings and provide a degree of green visual amenity in views from these adjoining properties. As noted below, conditions and obligations have been attached to this permission to ensure that the green walls and other ecological measures are implemented and maintained on site. The visual impacts are considered to be reasonable given these factors.
- 6.5.5 With regard to daylight and sunlight, the submitted Daylight & Sunlight Assessment states that the adjacent houses on Pinner Road which are directly affected by the proposal are nos. 157-255 Pinner Road as well as 58, 62, 64 and 66 The Gardens (the 54 houses identified as sensitive receptors). For the daylight analysis, the report shows that all of the tested windows of these properties would meet the BRE Guidelines for VCS (vertical sky component) and No Sky Line test, with 100% of these neighbouring windows meeting both these tests. The sunlight analysis for these same windows, 100% of the windows meet the 3 relevant tests. With regard to impacts on the rear garden area, a Sun on the Ground analysis, which assesses the shadowing impacts on the amenity areas as it would be on the Spring Equinox, shows that impacts on all the neighbouring gardens meet the BRE guidelines (that half of the garden or amenity area receive at least 2 hours of direct sunlight on the 21st of March, and/or the sunlight shall not be reduced by more than 20%). It is noted in the report that BRE guidelines do not provide any thresholds or assessment criteria for overshadowing analysis carried out at any date other than 21st March.) Figure 2 below, taken from the DAS, shows the diagram for this analysis.
- 6.5.6 With regard to daylight and sunlight impacts, there would be no discernible impacts on rear windows of these properties (given the distances involved). The rearmost part of affected gardens would experience some overshadowing, but this would remain within BRE guidelines. Given this, it is considered that the proposal would not result in an unreasonable level of overshadowing and daylight impacts on these neighbouring properties.

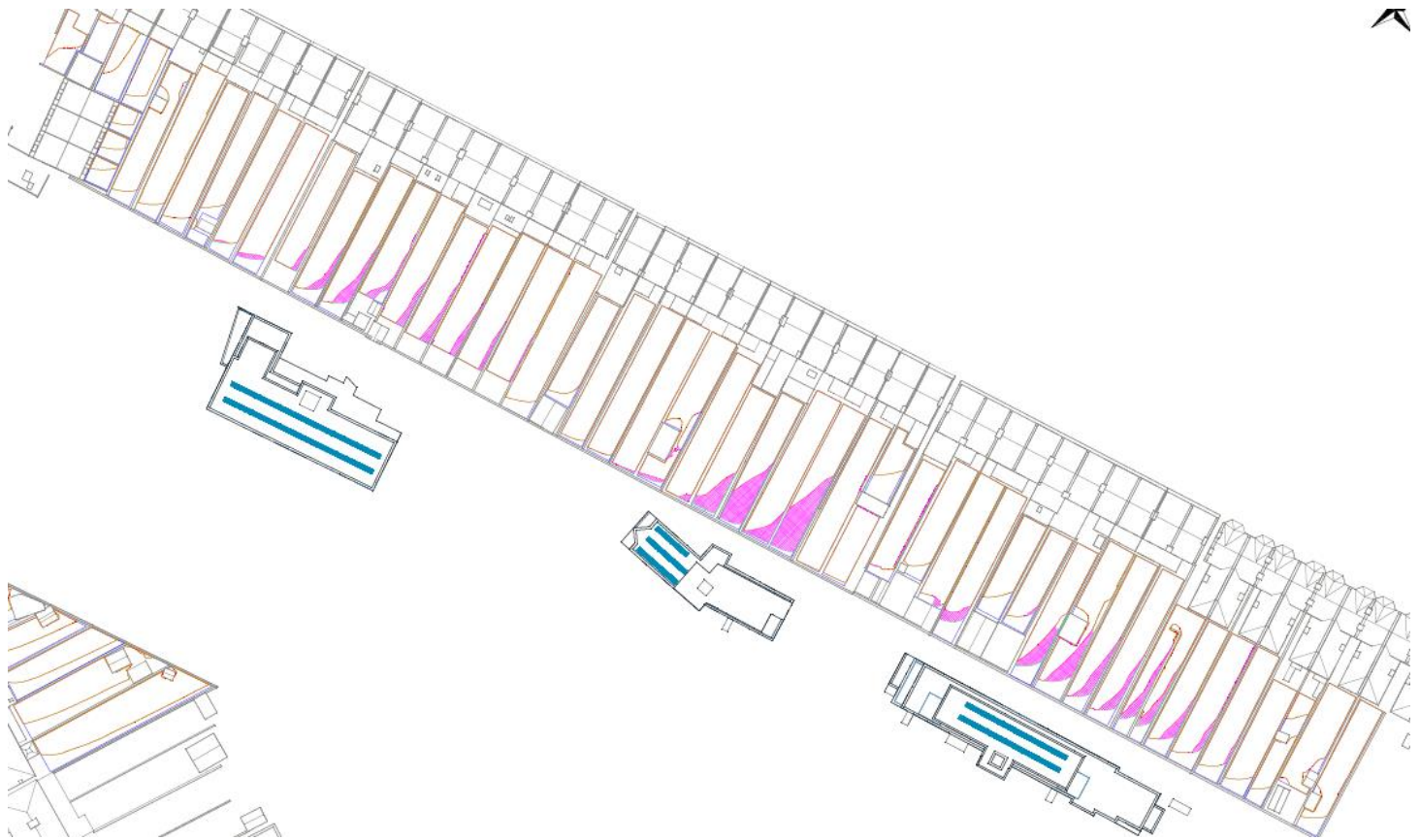


Figure 2: 2hr Sun on Ground analysis – purple areas represent shadowing impact of the development on 21 March.

6.5.7 The distance of the rear windows of these properties from the common boundary would mitigate issues of privacy relating to habitable room windows, but would not fully mitigate overlooking or privacy concerns to the garden areas. Nevertheless, overlooking to rear gardens and habitable room windows of Pinner Road properties is considered to be mitigated through a reduced number and size of secondary window openings, the use of angled window forms for primary habitable room windows on Blocks 2 and 3, and moderate heights of blocks. All north-facing windows on upper levels of Block 1 serve non-habitable rooms or corridors, or are secondary windows to habitable rooms, are small in size and can be conditioned to be obscure-glazed. Secondary windows for Blocks 2 and 3 would also be conditioned to be obscure glazed.

6.5.8 Some balconies have side openings facing north, which could also result in overlooking and loss of privacy. These can be conditioned to have privacy screening.

Impact to Nos. 7-14 Neptune Road

6.5.9 The closest of the three blocks to the Neptune Road entrance (Block 3) would be sited 125m from the access point. Given this, it is not considered that the proposal would have any direct impacts upon the properties along Neptune

Road in terms of amenity impacts. Issues relating to traffic and parking are dealt with separately below.

Impact to Houses along The Gardens

- 6.5.10 The boundaries of properties to the south as located approximately 40m from the site boundaries as measured from the location of Block 1. Given this distance, it is not considered that there would be significant amenity impacts upon these properties. In addition, the submitted Daylight and Sunlight assessment demonstrates the closest of these houses would not suffer significant daylight/sunlight impacts.

Noise & Disturbance

- 6.5.11 The proposal would involve a residential development in a residential area, and so in this regard would not be considered to be unsuitable. Given the distance of the blocks from surrounding houses, the general disturbance of comings and goings of residents would not be considered to be significant for existing neighbours.
- 6.5.12 The proposed internal road would introduce vehicular traffic into this area, and concerns have been raised by local residents about the pollution this would entail, in particular given that the site's levels (including the proposed internal road) would be above those of the adjacent rear gardens. However, given the low volumes of traffic this would involve and the distance of the houses from the site boundaries, it is considered that the disturbance which would be caused would not be significant. In some places, Block 2 and 3 would be sited between the road and the gardens, and so would further buffer noise and other impacts. Furthermore, transport related emissions from the site were also assessed as part of the Air Quality Assessment, and were shown to be neutral in line with the London Plan guidance. This report was reviewed and approved by the Council's Environmental Health officers. An additional concern was raised that the development of the site would result in a loss of the existing noise buffer with the railway. However, the embankment would remain, and the introduction of new buildings would increase noise buffering in some parts of the site. Although existing vegetation would be removed and replacement plantings would take time to get established and grow, these would still provide for the same buffering function once established.
- 6.5.13 Based on the above, it is not considered that the proposal would cause significant harm to the neighbouring residential amenity in accordance with policy D6 of The London Plan (2021) and policy DM1 of the Harrow DMPD (2013).

Future Occupiers – Internal Configuration and Quality of Accommodation

- 6.5.14 Policy D6 of the London Plan specifies that boroughs should ensure that, amongst other things, 'housing development should be of high-quality design and provide adequately-sized rooms with comfortable and functional layouts'.

It also sets out the minimum internal space standards for new dwellings. The use of these residential unit GIA's as minima is also reiterated in Appendix 1 of the Residential Design Guide SPD. The National Technical Housing Standards provide additional detail.

- 6.5.15 The Mayor's Housing Design Standards (2023) states that new homes should be dual aspect unless exceptional circumstances make this impractical or undesirable; and that where single aspect dwellings are proposed they should be restricted to homes with one or two bedspaces; should not face north; and must demonstrate that the units will: have adequate passive ventilation, daylight and privacy; and not overheat (particularly relevant for south or west-facing single aspect units). Policy DM1 undertakes to assess amenity having regard to the adequacy of the internal layout in relation to the needs of future occupiers.

Internal Layout

- 6.5.16 The internal floor areas would meet or exceed the minimum space standards as set out within the Mayors Technical Housing Standards – Nationally described (2016) and The London Plan (2021). The London Plan also seeks 2.5m floor to ceiling heights for 75% of the Gross Internal Area (GIA), the development provides a minimum of 2.6m floor to ceiling heights on all levels. The overall layout and circulation space of each unit is good. Built-in internal storage is generally good although some units have marginal shortfalls of 0.1m³, which would on balance be acceptable. Unit 19 had a shortfall in storage space of 1.0m³, which would not be acceptable; however, the submitted revised plans have corrected this and the storage space for Unit 19 is now in compliance.
- 6.5.17 The internal layout and arrangement of Blocks 1 and 2 allow for a reasonable number of dual aspect units. Revised plans were provided to improve the layouts of some units, to increase the number of dual aspect units and allow for more south-facing units. These changes have improved the scheme which is now more satisfactory. North-facing single aspect units are now limited to 3 no. units on the lower ground floor of Blocks 2 and 3 and 1 no. unit on Block 1 (which are constrained by the site levels); and there are 8 south-facing single aspect units in Blocks 1 and 3. These are all 1 or 2-bed units. Although fewer single aspect units would be preferred, on balance and given the constraints of the site including the fall in ground levels and the need to limit overlooking on northern aspects, the proposed number of single aspect units is considered acceptable and in compliance with the Mayor's Housing Standards.
- 6.5.18 Outlook for most units is good, however, the lower ground floor units for Blocks 2 and 3 have some limited outlook due to their proximity to the boundary fence. Nevertheless, some distance is provided (2-3m at minimum) and the area would be landscaped to provide visual amenity. Given the relatively small number of units affected, this is considered, on balance, acceptable.

- 6.5.19 The stacking arrangements between the floors of each block are generally good, but with some overlaps. As the proposal would be subject to building control regulations which would include noise mitigation measures, however, this degree of overlap would be acceptable.
- 6.5.20 The submitted Daylight & Sunlight Assessment demonstrates that all but 3 habitable rooms of the proposed development – as originally proposed – would be within BRE guidelines for daylight in winter. Of the 3 rooms that do not meet the criteria, 2 are kitchens (Units 17 & 18) and 1 is a bedroom (Unit 28). For measurements of direct sunlight, 8 of 37 would not meet the BRE guidelines for both winter and summer crown conditions; all of these are north-facing windows. However, the internal layout of 2 of these 8 flats (Units 27 & 28) have been amended in response to comments from the Urban Design officer; an Addendum from Herrington Consulting Ltd. confirms that BRE Guidelines are met in at least one habitable room within each of these 2 units. Both units have been re-arranged so that they now have south-facing windows and patios. On this basis, it is considered that these units now have an overall improved layout and access to natural light.
- 6.5.21 Further amendments were made to the layouts of other flats following further concerns raised by officers regarding overlooking to neighbouring rear gardens, affecting 2 more of the above 8 units (Units 32 and 33). These have been reoriented to face the southern side of Block 3, so that windows and balcony are all now south rather than north facing. Although this has not been formally re-assessed by the Daylight & Sunlight expert, given the shift from north to south-facing it would reasonably be expected to achieve an improvement in daylight and sunlight to these units.
- 6.5.22 Of the remaining 4 north-facing units noted above, these are located on ground or lower ground floor levels, and options for south-facing aspects are limited due to site levels. Given their location and orientation, as well as the site topography in this location, there are few mitigation measures which can be put in place to remedy this situation. The lighting levels in these units is therefore acceptable.
- 6.5.23 On balance, this lower number of overall units which would not fully meet BRE criteria would not be of sufficient weight to justify refusal. Overall and on balance the development would therefore result in an acceptable level of daylight and sunlight to the proposed units.
- 6.5.24 Circulation space in the internal communal areas is reasonably good, with minimum hallway widths provided. Stairways and lobbies are provided with reasonable natural light, except where this is limited on the lower ground floors by the site levels.
- 6.5.25 The site is adjacent railway lines, and as such the proposed units would be subject to significant noise and vibration from passing trains. The proposal would include an acoustic fence, and double-glazed windows with trickle vents

as well as mechanical ventilation. Provision of foliage and hedging to the southern boundary help partially limit noise pollution from the railway line, as well as providing visual amenity, but cannot be relied on, in particular given the rights TfL have to remove or cut vegetation.

Noise, Vibration and Overheating

- 6.5.26 The submitted Noise and Vibration report provided some details which were satisfactory; however the Environmental Health officer raised several concerns. Among the primary issues were the timing of the data collection relied upon for the assessment of noise impacts from the adjacent railway, which was done in July 2020, in between Covid-19 pandemic lockdowns, as well as clarification regarding other technical details of the data collections such as the number of monitoring points, night-time monitoring and the specific BS guidance relied upon. The Local Planning Authority (LPA) raised concerns about the technical details and whether the measurements would reflect the current levels of train activity, and therefore noise, given the timing of the original surveys. Other minor issues were also raised, including whether the sound levels for south-facing balconies would be acceptable, given that the calculated noise exposure would be 2db above the guidance.
- 6.5.27 The applicant subsequently submitted an updated Technical Note which included a fresh noise impact survey. This survey addressed the key concerns raised, and the new measurements indicated a slightly lower level of noise than in the original survey. On the basis of the revised data, it is considered that the proposal would not result in an unreasonable amount of impacts to the future occupiers of the development, subject to the recommended mitigation measures being implemented. These include an acoustic barrier (fence) which is also shown as part of the landscaping proposals, the use of glass balustrades for balconies which buffer a small amount of sound, the use of glazing which would mitigate sound, and MVHR (mechanical ventilation with heat recovery) systems within each unit. A condition has been attached to ensure the proposed mitigation measures are implemented.
- 6.5.28 As MVHR would be relied upon, and given that the proposal constitutes a major application, the development would need to address Policy SI 4 of The London Plan, regarding overheating. A document addressing overheating was submitted, and is sufficient to demonstrate that there would not be likely to be overheating in the future units. The proposal would therefore be considered to comply with Policy SI 4.

Play Space

- 6.5.29 Policy S4 of the Mayor's London Plan seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sqm. per child. The proposed development makes provision for multiple small areas of informal, doorstep play space for children, totalling 375.24sqm over the

site. This would include natural play features. The GLA's child yield place space calculator generates a yield requiring a total of 121.7sqm for all age groups on a provision of 10sqm per child. Thus, the total provide exceeds the minimum required. The play space provided would be geared towards younger ages, although as part of detailed landscaping, provisions could be made to provide spaces for older children. It is noted that the entrance to Harrow Recreation Ground is located approximately 400m from the site access off Neptune Road, which would allow also for access to public play space. The play space provided would therefore be acceptable, subject to a condition for detail specification of play equipment, which shall be specified to include some provision for older age groups.

- 6.5.30 The play space does require careful consideration due to its proximity to the internal road, and concerns have been raised by statutory consultees on ensuring that sufficient separation is provided to keep children in particular safe. Given the low levels of traffic, a barrier (bollard or fencing) would likely be satisfactory. Final details of this can be dealt with as part of a landscaping condition attached to this permission.

Private and Communal Amenity Space

- 6.5.31 The Mayor's Housing Standards requires a minimum of 5sqm private outside space per 1-2 bed dwelling and an extra 1sqm for each additional occupant. All units would have their own private amenity space (in excess of the minimum required size). Although winter gardens would be helpful in sheltering balconies from noise /disturbance, they would likely create significant solar gain in summer months, creating uncomfortably warm living spaces. Thus, the balconies as proposed would be acceptable.
- 6.5.32 Terraces on the lower ground floors of Blocks 2 and 3 would be somewhat enclosed due to the changes in site levels, but revised elevations show that these would be provided with side openings that would provide a reasonable amount of light and air circulation, and so would be acceptable.
- 6.5.33 Glazed balustrades as proposed are acceptable for south, west and east elevations. However, glazed balustrades to north-facing sides of balconies would not address overlooking concerns. As noted above, privacy screens would be required as part of a condition, which would address this point. Details of the balcony treatments would also be part of the condition for materials attached to this permission.
- 6.5.34 In addition, there is a total of 275.7sqm of communal amenity space provided on site. Given the changes in ground levels, a significant amount of this area would likely serve as primarily visual and green amenity. Nevertheless, given the ample green space provided and the extensive landscaping to be provided, it is considered that there is satisfactory high-quality communal amenity space within the development. Details of levels, furniture, and other elements of communal amenity are dealt with by condition, which will also provide details of accessibility.

Accessibility

6.5.35 Policy D7 of The London Plan relating to Accessible Housing, requires at least 10% of new housing to meeting building regulations M4 (3) – ‘wheelchair user dwellings. Furthermore, it requires all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings. The proposals would provide 10% of residential units (i.e. 4 units) as wheelchair adaptable units at ground floor level and as such the proposals would be complaint. The submitted information confirms all other dwellings would be compliant with Part M4(2). A condition is attached to ensure compliance with the regulations; while those wheelchair homes which are allocated to Affordable Housing units would be secured as part of the S106 agreement.

6.6 Traffic, Parking and Servicing

6.6.1 The relevant policies are:

- The National Planning Policy Framework (2023)
- The London Plan (2021): T4, T5, T6/T6.1
- Harrow Development Management Policies (2013): DM1, DM42, DM43, DM44, DM45
- Harrow's Core Strategy (2012): CS1.R
- Code of Practice for Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (2106).

6.6.2 Policies DM1 and DM42 of the DMP give advice that developments should make adequate provision for parking and safe access to and within the site and not lead to any material increase in substandard vehicular access.

6.6.3 Harrow's Highways authority confirmed that the site has a base Public Transport Accessibility Level (PTAL) of 3 (moderate) with the west of the site predicted to rise to 4 (good). It is located close to a neighbourhood parade of shops and services, local bus routes, and a station, and within reasonable walking distance of both Harrow town centre (15-minute walk) and North Harrow centre. It would be reasonable to expect that some people could live here without having to rely on a private car.

Trip Generation and Travel Plan

6.6.4 The Transport Assessment has been assessed by Harrow's Highways officer, and it was confirmed that the likely traffic generation would be minor. Road traffic collision information has been provided covering the last five years, and the Highways officer also confirmed that many of the accidents were recorded as being 'slight' and appear to have been at junctions, which is not uncommon. It is considered that the development proposal is unlikely to affect this level of

incidents; nor are any improvements for the existing roads considered necessary to make the development acceptable.

- 6.6.5 Targets for encouraging sustainable transport modes are ambitious, and the planned mitigation measures would increase this number; albeit this may realistically only happen over a longer time frame.
- 6.6.6 The overall impact is therefore unlikely to be severe; surrounding roads and junctions would continue to operate within capacity with no significant queuing anticipated, mainly due to the low level of car parking proposed. The variety of public transport locally does mean that new trips would be spread amongst these options and are also unlikely to have a noticeable impact.
- 6.6.7 It is noted, however, that public comments cite that blockages occur along Neptune Road due to large commercial vehicles associated with the industrial premises. This appears, based on the comments submitted, to be due to improper management and possible traffic infractions of commercial vehicles from these adjacent sites. This would not therefore fall under the purview of planning. Furthermore, as the proposal does not involve commercial uses which would generate this type of traffic, and the existing activities are not part of the site and are outside the control of the developer, it would not be reasonable to attempt to control or sanction it under this application, or to refuse permission on this basis.
- 6.6.8 The application is also supported by a Travel Plan to encourage and support the uptake of sustainable modes of travel, to ensure effective site management and access, and to manage the impacts on the local highway network (and the environment) once the buildings are occupied. (The management of vehicles during construction including staff and visitor cars will be dealt with as part of the Construction Management Plan.) The Travel Plan has been reviewed by the Travel Plan officer. The document is considered acceptable, subject to standard obligations within a S106 agreement to secure its implementation and appropriate follow-up including baseline and follow-up surveys and revised targets based on those surveys.

Car club

- 6.6.9 The proposal would include the provision of one car club space, which is proposed to be located on Neptune Road (thus allowing access by the wider community). This would further reduce dependence on private cars and help support sustainable travel. The details for securing this provision are to be via a S106 agreement.

Site Layout, Access and New Roadworks

- 6.6.10 The proposal would create a vehicular road to connect the blocks with the existing access off Neptune Road, as well as pedestrian access through to both Neptune Road and The Gardens. The creation of a pedestrian access to The Gardens greatly improves the permeability and walkability of the site

and provides almost direct access to West Harrow station (6-minute walk). The LPA would strongly support the inclusion of this pedestrian access for these reasons.

- 6.6.11 The access off Neptune Road is an existing one and the vehicle crossing officer is satisfied with this, subject to appropriate signage being implemented along Pinner Road, as Neptune Road is a one-way street. This will be secured via a S106 agreement. It is noted that the gates are set sufficiently far back from the public road (approximately 11m) to allow for vehicles to wait without blocking the flow of traffic on Neptune Road.
- 6.6.12 Although “gated” communities would normally be resisted, in these circumstances, given the distance of the buildings from the access points, and the need to protect the activity in and around the badger sett, it is considered that controlled gating at both access points is acceptable.
- 6.6.13 The internal road would be shared surface, although a condition for landscaping details would require some differentiation for pedestrians and measures to ensure protection of pedestrian and ensure play areas located near the road are also safely separated from vehicle traffic. As this road would only serve the development itself, volumes of traffic would be anticipated to be low, and the design of the street is intended to help constrain speeds.
- 6.6.14 A road safety audit of the proposal was carried out recently; Harrow Highways officers confirmed this did not identify any issues with the design, subject to detailed design stage. However, the length and width of the road raises some concern as it may be difficult for vehicles to pass each other without overrunning the area designated for walking. This is balanced with considerations that the proposal ensures the space available is given primarily to landscaping/ecology and that a narrow street with low traffic flows is more likely to achieve the intentions of a shared surface. It is also noted that increasing the size of the road may encourage informal and improper parking on site, which would be detrimental and would cause greater problems for pedestrians, cyclists, and passing vehicles. Thus, on balance, it is considered better to accept the road as proposed, and condition detailed design to be submitted, which will ensure the safety of the most vulnerable road users/pedestrians.
- 6.6.15 Swept path drawings have been supplied that demonstrate that cars and lorries can access this site. There is sufficient turning space for both types of vehicle and cars can easily pass each other; there may however, be difficulties with passing lorries. However, as the anticipated flow of vehicles is very low, the likely frequency of vehicles passing each other is low. Provided the route is well lit and maintained, the Highways officer considers the risk to pedestrians is also likely to be low.
- 6.6.16 The proposed design of the access and internal road is acceptable. A highway agreement will be required to enable the developer to carry out the

work; and the S106 will also require the developer to enter into an agreement with Harrow Highways Authority to add additional signage for the one-way operation of Neptune Road.

Delivery and Servicing

- 6.6.17 A delivery and servicing plan has been provided as part of the Transport Statement, which is considered acceptable by the Council's Highway officer. It is considered that 37 flats would not generate a significant level of HGV deliveries per day; and that deliveries are more likely to be undertaken by smaller vehicles (e.g. shopping and small van deliveries). As there is no dedicated parking area for unloading, deliveries will be on-street (within the development boundaries). Given the low number of vehicles expected, this is considered likely to be feasible.
- 6.6.18 The proposal incorporates a combination of a 2-bin communal system and a 3-bin private system. Waste storage for Block 1 would be integrated into the building, while Blocks 2 and 3 would have free-standing waste storage areas. In addition, wheelchair units for Blocks 2 and 3 and Unit 29 of Block 3 will be provided with their own private bin stores for greater convenience. A total of 5 x 1100L communal waste bins and 5 x 1280L recycling bins will be provided across the development (excluding the private bin stores), which would be above the required provision set out by the Council's Code of Practice for domestic waste. The proposed arrangement also ensures that each block has a satisfactory provision of waste storage for the number of units per block. This would therefore address concerns that the development would not provide sufficient waste provision. The Council's Waste management officer has confirmed the arrangements are acceptable.
- 6.6.19 Several concerns have been raised regarding existing fly-tipping on site, fly-tipping at other developments, and concerns that future residents would be prone to fly-tipping themselves. It is noted that the amount of fly-tipping on site at present is not of significant weight in this application, although the development, given it would increase passive surveillance and include controlled access, would be more likely to reduce fly-tipping compared to the existing circumstances. Fly-tipping at other sites is not a material consideration, and there is no basis for assuming that future residents would be prone to fly-tipping, given that waste storage provisions exceed the minimum required by the Council's Code of Practice for Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (2016).

Car Parking

- 6.6.20 The site is surrounded by a controlled parking zone; however the CPZ does not include the site itself. Of the 12 parking spaces to be provided, 3 would be disabled bays, with all bays either providing passive or active EVC provision. Given the Site's PTAL (public transportation accessibility level) and accessibility, the starting point for development is "car free", although the

London Plan would allow for a maximum of 0.5-0.75 spaces per dwelling for a site in PTAL 4 (the highest PTAL that could be considered for this site).

- 6.6.21 The application was supported by parking surveys, which show that despite some periods of excessive stress, there is still a good level of capacity for additional parking. Taking the worst-case scenario, accounting for the proposed parking and anticipated overspill parking which would result from the development if no mitigation or conditions are applied, it is considered that the mitigation measures recommended by the Highways officer would ensure the development does not result in unacceptable additional levels of parking / overspill parking. The mitigation measures include a permit restriction agreement and a Parking Design and Management Plan, as well as the proposed car club space and travel plan (both as noted above). These will be secured by way of conditions and S106 obligations.
- 6.6.22 The needs of the disabled must be considered as part of parking provisions, under London Plan policy T6. The proposal provides above the minimum number of disabled spaces required at the outset. However, as part of the Parking Design and Management Plan, it is recommended that the proposal demonstrate how additional bays would be converted to disabled parking in future should demand increase.

Cycle parking

- 6.6.23 Good quality, accessible cycle parking is also essential for achieving modal shift as is a safe and well-maintained environment within the shared surface. The development is required to provide a minimum of 63 sheltered, secure and accessible long stay cycle parking spaces and 2 short stay spaces for visitors. The proposal includes 69 cycle parking spaces in total (63 long stay spaces and 6 short stay spaces). Long stay cycle parking will be provided within dedicated secure communal cycle stores within the proposed buildings for residents, and the short stay cycle parking will be provided outside each block. The long stay store would need to accommodate at least 5% accessible stands. Detailed specifications of the cycle storage are required but can be secured by pre-commencement condition, to ensure that any necessary changes to the design are considered prior to construction.

Construction Logistics

- 6.6.24 A construction logistics plan has been provided which has been deemed acceptable by both Harrow's Highways officers and TfL. A full detailed document will be required prior to commencement on-site by condition, following TfL guidance and format. This should only be submitted when the final contractor has been appointed and is in agreement with the planned measures.

Additional Comments from TfL/London Underground

6.6.25 Transport for London (TfL)/ London Underground have provided comments which request additional conditions not already discussed above. Some of the requested details, however, would sit outside the purview of planning, and would not meet the tests set out in the NPPF for the use of conditions. Other details would already be covered by conditions that have already been discussed above, e.g. for construction logistics. However, it is considered reasonable to impose a condition requiring details of any structural or civil engineering work to ensure that they do not interfere with or pose a risk to the railway infrastructure. Other obligations that the developer may have with regard to TfL property would fall outside of the purview of planning and the onus will be on the developer to ensure that they fulfil these obligations separately, and notwithstanding any grant of planning permission.

Summary

6.6.26 The overall impacts of the development in terms on the surrounding network would be within acceptable parameters. Although the proposal could result in some overspill parking, provided that suitable mitigation measures are secured by condition and S106 obligations, these should be controlled to an acceptable degree. Other finalised details can be secured through conditions.

6.6.27 Therefore, this proposal is unlikely to result in a severe or harmful impact for the surrounding highway network, subject to such conditions and obligations, which are attached to this permission.

6.7 Flood Risk and Drainage

6.7.1 The relevant policies are:

- The National Planning Policy Framework (2023)
- London Plan (2021): SI 5, SI 12, SI 13
- Harrow Development Management Policies (2013): DM9, DM10

6.7.2 Policy DM9.B of the Development Management Policies Local Plan (2013) states, *“proposals that would fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.”*, while policy DM10.D states that *“Proposals that would fail to make adequate provision for the control and reduction of surface water run off will be refused.”*

6.7.3 The site is not located within a flood zone or a Critical Drainage Area. However, there are small areas of flood risk identified immediately adjacent the site, to the north and the west. The Drainage Authority have also previously noted localised flooding has been identified on site. The proposal would result in an increase in hardstanding on the site, and so would result in increased surface water run-off. No concerns have been raised by the Drainage Authority or by TFL with regard to development of the existing embankment affecting flooding or stability.

6.7.4 The Flood Risk Assessment & Drainage Strategy submitted by the applicant is considered broadly acceptable, however the access to the site from 'The Gardens' is identified within surface water flood zone 3a & 3b, and the flood risk at this access point needed to be addressed to ensure a dry/safe access. Revised information was provided which then addressed this point, and the Drainage Authority have approved the details. Standard drainage conditions for surface water disposal, foul water disposal and surface water attenuation & storage area attached to this permission. Permeable paving is proposed as part of the development, and a condition has also been attached for final details of this to be submitted for approval. These conditions would address the concerns regarding water run-off on site, as mitigation measures would be included in these details. In addition, separate consent would be required from Thames Water to connect to the existing system.

6.8 Ecology, Landscaping and Biodiversity

6.8.1 The relevant policies are:

- National Planning Policy Framework (2023)
- London Plan (2021): G1, G5, G6, G7
- Harrow Development Management Local Policies (2013): DM1, DM20, DM21, DM22

6.8.2 The development site is a vacant parcel of land adjacent the railway, which is currently comprised of overgrown vegetation, largely of self-seeded. The site is not designated as a protected area. Although there was a previous permission on the site to create a wildlife sanctuary, this was never implemented and that permission has lapsed. There is therefore no current specific policy definition or Use Class attached to the site. In addition, it must be noted that TfL retain rights over parts of the land, allowing them to control and cut back vegetation in areas adjacent the track, and TfL have undertaken such works in recent years. It is likely that some trimmings have also been carried out by the developer, in particular where required to maintain the access into the site. Several factors create challenges on the site, including the shape of the site and topography, with significant level changes. The site appears to be regularly trespassed and has had ongoing issues with fly-tipping. There is also Japanese Knotweed present on site.

6.8.3 Nevertheless, the site does form an area of natural greenery and woodland with associated wildlife activity, which does have intrinsic value and contributes (informally) to local green corridors; and this must be taken into account, with any harm or loss being satisfactorily mitigated in line with relevant policies. Given this, the proposal can only be considered acceptable if it provides for a satisfactory level of biodiversity contribution. Both on-site and off-site contributions are assessed and considered below.

Badgers & Biodiversity

- 6.8.4 Policy G6.D of The London Plan requires development proposals, *inter alia*, to aim to secure net biodiversity gain; while Policy DM20.B states that “*The design and layout of new development should retain and enhance any significant existing features of biodiversity value within the site. Potential impacts on biodiversity should be avoided or appropriate mitigation sought. Where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on site or through contributions towards the implementation of relevant projects in Harrow’s Biodiversity Action Plan.*”
- 6.8.5 Since 2019 the Council has set a target of a 20% uplift in overall biodiversity value, applying the Metric requirements in relation to habitat replacement or substitution with regard to the protection and enhancement aspects of the existing local plan policies DM20 and DM21. Additionally, a minimum areal target equivalent to 2 biodiversity units per hectare has been applied.
- 6.8.6 The Council’s Biodiversity officer has reviewed all of the submitted information pertaining to biodiversity and has conducted multiple in-person site visits. The Ecological Assessment report is considered to provide a sufficient basis for the evaluation of the site and proposals; while the Outline Landscape and Ecological Management Plan is considered to provide a suitable basis for more detailed assessment and future work to refine and implement the details of the proposal.
- 6.8.7 The submitted information includes a Biodiversity Metric, which helps provide a guide to assessing the biodiversity loss and gain involved. The BNG valuation provided gives a baseline of 6.14 biodiversity units within the site’s 0.76 ha. Based on the above this is considered to be an appropriate valuation equating to a per hectare value of 8.08. The development would result in a loss of 5.59 units (91%) of the existing biodiversity value of the site, with what remains beyond the Badger Protection Zone concentrated in small pockets. (This can be contrasted with the near total loss of existing biodiversity features, other than a half-dozen retained trees under the withdrawn scheme.) In line with planning policy and other relevant legislation, the proposal sets out measures to mitigate this loss and provide new biodiversity measures on site.
- 6.8.8 Whilst the submitted report is largely considered acceptable, the Biodiversity Officer noted that some of the details require further refinement, and would also require oversight and monitoring to ensure that what is set out in the proposal can and will be delivered on site and retained in the longer term. As with all development, adjustments to the details may be required as the development progresses; for example, the implementation of the proposed artificial badger sett may result in a greater or lesser alteration to the existing retained landscape than anticipated. These provisions are secure by way of conditions and the S106 obligations which are attached to this permission.

- 6.8.9 The site is home to a sett of badgers, which appear to have located here relatively recently (c. 2019, as badgers were not reported onsite in surveys dating from 2016 and 2018, but were reported in 2020). Camera trapping survey work indicates that the badgers do forage off-site for food, including it seems, in the Allotment Gardens to the south, on the opposite side of the railway. A badger mitigation strategy has been provided which would result in the creation of a Badger Protection Zone (BPZ), 50m x 25m, in the western end of the site (adjacent The Gardens). This location allows some degree of isolation from the rest of the site, and maintains direct access to the southern boundary, towards the allotment gardens. Artificial setts would be created within the Zone, and the creation of the setts and Badger Zone would be phased so as to be completed and allow for the badgers to be re-located prior to the commencement of other works on site. The relocation and artificial setts would be regulated outside of the purview of planning, and would be subject to approval and licencing by Natural England.
- 6.8.10 The Badger Zone would not be accessible to the public, and would be separated from the rest of the development by fencing and thorny planting along the northern and eastern edges, to prevent intrusion. The footpath connecting the buildings with the access to The Gardens does run at the bottom of the slope adjacent to the sett, and would out of necessity require lighting. Although it would be ideal to have no lighting or footpath here, this access is considered vital for the success of the development, allowing permeability and direct access to a nearby train station. With careful design to the lighting, it is considered that a reasonable balance can be achieved between a safe level of lighting for pedestrians and minimising the effects of the lighting on the Badger Zone. Disturbance from people using the path would be minimised due to the secured access which would limit the numbers of people who would use the path to residents (and accompanying visitors) only.
- 6.8.11 Flora and fauna within the badger protection zone may be sensitive to dust which could impact on the badgers and so additional consideration has been given to this within the Air Quality Assessment and subsequent mitigation measures. Furthermore, the phasing of the development to ensure that the BPZ is implemented and the sett is relocated prior to the start of other works, in incorporated into the condition for the final Construciton Management Plan.
- 6.8.12 Both Natural England and the Biodiversity Officer consider that the proposal to provide an artificial sett would, on balance be acceptable. Along with other related conditions to ensure the badgers on site and the proposed sett are protected both during and after construction, a S106 obligation has been included to ensure monitoring and management of the Badger Zone, and prevent future development within it.
- 6.8.13 Green roofs have been provided, with some areas being biosolar, and which would contribute to the biodiversity on site provided that a suitable mix of plants and an increase to the minimum substrate is provided. Full details of these will need to be conditioned.

- 6.8.14 Other than the provisions already set out with regard to badgers, consideration of other species on site include reptiles (sloe worms), bats and birds, vegetation, and invertebrates. In addition, the presence of some invasive species is noted, which can be removed. The are on-site provisions for mitigation and improvements such as invertebrate shelters; bird and bat shelters; species-rich habitats within the application site and creation of suitable habitats and foraging for certain species within the landscaping including new native tree, scrub and grassland planting; and sensitive lighting design. In addition, Construction Environment Management Plan details will need to be submitted to ensure appropriate measures to protect all species on site. Again, final details of all of the above will be secured by condition.
- 6.8.15 Although it is considered that the above represents a fair assessment of what it may be possible to provide on-site, given the site constraints and other factors, delivering these measures effectively would require on-going care to ensure, amongst other things, plantings get established and to continue to thrive and survive afterwards. Subsequent die-off or damage is a natural possibility. Mitigation for fauna would also require detailed approval and proper implementation. In order to ensure the mitigation and biodiversity uplift are delivered, on-going monitoring and adjustments to the plan will be required for a longer time period that would normally be governed by conditions. Furthermore, the measures above would not by themselves be sufficient to off-set the loss; thus requiring the additional of an off-site contribution to make up the shortfall, as per policy DM20. The off-site contribution would be used to help provide for the creation of new biodiverse areas within the borough. A potential strategically-located woodland creation site has been identified, although the final selection will be subject to separate processes outside of planning. Both the off-site contribution and the long-term monitoring / remediation are secured by way of S106 obligations.

Landscaping

- 6.8.16 The site would be subject to extensive landscaping, with provision for children's playspace, as noted in the section dealing with residential amenity, and which forms part of the biodiversity considerations on site.
- 6.8.17 The application is accompanied by a Landscape Strategy Plan and Outline Landscape and Ecological Management Plan (LEMP). It is noted that the development would necessitate changes to levels (affecting existing vegetation) and result in the loss of trees and some habitats.
- 6.8.18 The Council's Landscape Architect has reviewed the submitted details and concluded that the proposed landscape strategy has included consideration and incorporation of ecology, outside amenity and play, trees and Sustainable Urban Drainage (SuDS). It was further noted that the LPA's previous recommendations have been incorporated; and that the scheme and layout are considered well thought-out and achievable. Significant trees are retained where feasible, with new tree, shrub, ornamental plants and rain gardens to mitigate the loss and provide enhancements to the biodiversity.

- 6.8.19 The areas allocated for informal play are welcome, but are tight due to the space constraints. The proposed play equipment would be suitable for the setting and nature of the play areas, and final details are to be conditioned, including barriers to ensure safety from passing vehicles.
- 6.8.20 Along the northern boundary adjacent the rear of the properties along Pinner Road, the proposed landscaping would include a buffer zone of native planting. The Landscape Architect considers that this planting, over time, will grow sufficiently tall to soften the edge of the site between the proposed development and the neighbouring houses. However, as noted above in the section dealing with residential amenity, the planting will not screen the proposed built development. Sections of the building elevations have steel cables / mesh system to enable climber growth, which would help to soften the built form and increase visual amenity for neighbouring residents, although it would not fully screen the buildings which would still be apparent and highly visible. It is therefore important that these climbers are well implemented and maintained as part of the attached condition and S106 obligations so as to ensure the benefits of this visual amenity.
- 6.8.21 Along the southern boundary, Transport for London own the adjacent land, with covenants attached restricting development within 5 metres of the boundary and, to allow for TfL access from Neptune Road via a pedestrian gate to the trackside. Consideration of these restrictions are incorporated into the design of the landscape masterplan. This includes a proposed sound attenuation fence along the length of this boundary (further discussed in the section above dealing with noise and residential amenity). The fence would serve a dual purpose as it would help to enhance the amenity space as well, being visually softened by planting climbing plants to create a green wall. As other landscaping along the southern side is minimal, it is important that the planting along this fence survives and thrives. The conditions/obligations recommended from for landscaping and biodiversity include the management, maintenance, monitoring and replacement planting of this area are accordingly attached.
- 6.8.22 Biosolar roofs are proposed, incorporating species rich wildflower plantings with roof mounted PV panels. Bin stores have green roofs incorporated as well as invertebrate shelters. This will enhance the biodiversity and will, again, require regular and ongoing management and maintenance to ensure success as part of the conditions and obligations.
- 6.8.23 Therefore, subject to planning conditions and appropriate detail, it is considered that the proposed landscaping would complement the development, and contribute to biodiversity.

Trees

- 6.8.24 Trees also from part of the biodiversity considerations. There are a number of identified TPOs (Tree Protection Orders) on the site for both individual and groups of trees. However, LB Harrow's tree officer has confirmed that several trees originally listed on the TPO are no longer present, so the TPO details may not now reflect what is currently on the site. In addition, the Council's officer confirmed that works to remove trees adjacent the railway have been carried out by TfL in recent years, for safety and arboricultural purposes.
- 6.8.25 An Arboricultural report has been submitted by the applicant, which has been reviewed by the Council's Arboricultural officer. In addition, the Council's officer is familiar with the site. The submitted report has been reviewed by the Arboriculture officer, who concurs with the analysis and conclusions. It is noted that there are no Category A trees on site, and that the majority of trees that are proposed to be removed are of lower quality, some of which would require removal regardless of the proposed development (due to ash die-back, etc.) A large sycamore on site was originally hoped to be retained, however taking into consideration its condition, it is agreed that replanting with a hardy native species would be likely to produce a better outcome. The trees that would be retained would serve as focal points for the communal amenity space and the setting of the buildings. The Arboricultural officer also identified that there are opportunities to improve the soil and rooting environments for the retained trees, as well.
- 6.8.26 It is noted that some encroachment on root protection areas (RPAs) would be necessary by the access road and parking, but that suitable construction and protection measures would mitigate this. A condition for details of tree protection during construction has been included as part of this permission. The condition has been worded to include details of measures to improve the root environment for the retained trees.
- 6.8.27 Full details of replacement trees to be planted would be included as part of a landscaping condition. Finally, a condition has been attached which restricts the cutting down or alteration or damage of retained trees on site for a period of 5 years after the completion of the development, without the written permission of the Council. Note that considerations for existing and new trees is also captured as part of the biodiversity conditions and S106 obligations noted above, with an additional condition for tree protection measures during construction and improvement to rooting environments. Subject to such conditions and obligations, the proposal would be satisfactory in terms of arboricultural matters.

Urban Greening Factor

- 6.8.28 Policy G5 of The London Plan sets out that development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include tree planting, green roofs and walls, and soft landscaping. A target of 0.4 for residential development should be achieved in line with this policy.
- 6.8.29 The site achieves an UGF calculation of 0.59; although the Biodiversity Officer noted that the biosolar roofs were calculated incorrectly and the figure should be adjusted to 0.58. Nevertheless, this exceeds the above target, through the inclusion of a wide range of contributors including the landscaping details already discussed, rain gardens, green walls and roof, and permeable paving. The proposal would be considered acceptable in this respect.

Japanese Knotweed

- 6.8.30 There is Japanese knotweed on site, which, as per standard practice, would be required to be eradicated by the developer prior to the commencement of construction, and a condition is included here to that effect. It is noted that the applicant has undertaken previous works to treat the Knotweed on site, including recently, and the Landscape's Architect recommendation for the inclusions of a site survey to assess its current state would therefore be reasonable. It is further noted that the Japanese Knotweed eradication would need to be carried out prior to the commencement of works so as to avoid interference with the implementation of the artificial badger sett.
- 6.8.31 For clarity, the removal / treatment of Japanese knotweed on site would eradicate it, not cause it to be re-located to other nearby sites. As the removal and treatment of sites infected with Japanese Knotweed is a common and well-regulated issue, and planning conditions such as that attached here are regularly used to address the problem, it would be unreasonable to refuse permission for the development on the basis that the Knotweed has not yet been removed.

Summary

- 6.8.32 It is acknowledged that the loss of the existing woodland on site would be significant; however, this must be assessed in balance with the requirements and provisions of planning policy. Although the proposal would result in the loss of a natural (but undesignated) area of woodland, the proposed mitigation measures and contribution would sufficiently offset the loss and provide for a satisfactory biodiversity uplift, as per Policy G6 of The London Plan and Policies DM20 and DM21 of the Harrow Development Management Plan. Subject to conditions and a S106 agreement as detailed above, the proposal would therefore, on balance, meet the policy requirements with regard to biodiversity, urban greening, protection of trees, and landscaping, and would therefore be acceptable with regard to these matters.

6.9 Energy & Sustainability

6.9.1 The relevant policies are:

- National Planning Policy Framework (2023)
- The London Plan (2021): GG6, SI 2, S1 4, and SI 7
- Harrow Core Strategy (2012): CS1.T
- Harrow Development Management Local Policies (2013): DM12, DM13 and DM14

6.9.2 The application is accompanied by an Energy Statement Report, prepared by Delta Green Environmental Design dated 01/03/2023. The statement generally follows the GLA energy hierarchy and guidance. The statement outlines the sustainability measures proposed on site, which would include energy efficiency savings through building fabric, design, and utilities; the use of renewable energy generation in the form of PV's (photo-voltaic panels) and air source heat pumps (ASHPs). It is noted that the viability of air source heat pumps depend on ensuring that the system is adequately screened both visually and acoustically to prevent undue visual and noise impacts on future and neighbouring occupiers. A condition for these details relating to ASHPs is therefore attached.

6.9.3 The statement indicates that with these measures, the development would achieve a 64% on-site reduction in carbon emissions relative to Part L Building Regulations 2013, and thus exceeds the GLA requirements. The remaining 36% (to meet the zero carbon) shall be off-set by a financial contribution which will be secured through a S.106 obligation; with a further requirements for final "as-built" Part L calculations to confirm the carbon reduction achieved on-site and further contributions should the target savings not be achieved and securing compliance with the Mayor's 'Be Seen' guidance.

6.9.4 The proposed CLT (cross-laminated timber) structural system is fully supported by the Urban Design officer and the urban design officer has commended the ambitious use of this system, which would radically reduce levels of embodied carbon caused by the development over a reinforced concrete construction.

6.9.5 The measures proposed as part of the Energy Strategy to comply with zero-carbon policies, in combination with the measures outlined in section 6.7 and 6.8 to mitigate the loss of the existing woodland, incorporate sustainable drainage measures, and achieve a net biodiversity uplift would overall be compliant with planning policies seeking to address climate changes.

6.9.6 In conclusion, the Energy & Sustainability Statement is considered acceptable, as is the proposed CLT system, subject to the S106 measures noted above. Any permission should be also be conditioned to require the development is undertaken generally in accordance with an amended statement.

6.10 Fire Safety

6.10.1 The relevant policies are:

- The London Plan (2021): D5, D12

6.10.2 Part A of Policy D12 of the London Plan (2021) requires the demonstration of suitably positioned and unobstructed space for fire appliances and evacuation assembly points, and that development ensure robust strategies for evacuation are in place as well as confirmation of the fire-fighting water supply. Part B of the policy requires all major developments to provide a Fire Statement, which shows details of how the proposal would function, including means of escape for all building users including those who are disabled or require level access. Policy D5 encourages development proposals to achieve the highest standards of accessible and inclusive design.

6.10.3 A Fire Statement has been prepared by Osbourne Associates in support of the application. The Council's Fire Consultant has reviewed the Fire Statement and considers the document at this stage to be broadly acceptable. However, the consultant has highlighted that as the development would have an evacuation lift, a manned refuge should also be provided, in particular for residents who may have greater difficulty or differing needs in evacuating.

6.10.4 A revised Fire Statement was submitted which proposed measures to address this point. The revised document was deemed largely acceptable, with two minor clarifications/changes requested. A further revisions was submitted which addressed these points.

6.10.5 The revised fire safety measures are therefore considered to be acceptable, and a condition is attached to ensure the development is implemented in accordance with these details.

6.11 Air Quality & Contamination

6.11.1 The relevant policies are:

- National Planning Policy Framework (2021)
- The London Plan: SI 1
- Harrow Development Management Local Policies: DM1, DM15

Air Quality

6.11.2 The whole of the borough has been designated as an Air Quality Management Area (AQMA), due to exceedances of the annual mean objective levels for nitrogen oxide (NO₂) and particulates (PM₁₀). An Air Quality Assessment (AQA) was submitted with the application prepared by Stroma. Policy SI 1 states that this should take an Air Quality Neutral approach.

- 6.11.3 An assessment was undertaken as part of this report to examine the potential impacts on air quality during construction and operation of the proposed development. This showed that the release of dust and PM₁₀ (inhalable particles, with diameters that are generally 10 micrometres and smaller) are of medium to low risk, and the risk to human health assessed as potentially low to negligible. Suitable mitigation measures are required to ensure these impacts are mitigated against. A Construction Management Plan is therefore secured by condition. Furthermore, transport related emissions from the site were also assessed as air quality neutral in line with the London Plan guidance.
- 6.11.4 Subject to the recommended mitigation measures being implemented, the Council's Environmental Health Officers have confirmed the proposal would be acceptable with regard to air quality impacts. A condition has therefore been attached to require the development to be implemented in accord with the approved Air Quality document.

Contamination

- 6.1.5 The site is located adjacent a railway and although planning history shows no previous development, other available information shows it is comprised of made ground on a former railway siding. Consideration of contamination on site must therefore be considered.
- 6.1.6 A Phase 1 Environmental Report prepared by G.O. and a Ground Investigation report prepared by Jomas Engineering have been submitted with the application. The Environmental Health officer noted that the report identifies a couple of issues and recommends further intrusive sampling. Therefore, a final method statement detailing the proposed work any specific areas of concern, the extent of the soil to be removed and details of analysis of the replacement top soil would be required, and has been attached as a condition to this permission. Subject to such a condition, the proposal would be acceptable in terms of addressing potential contamination on site.

Pests

- 6.1.7 With regard to pests, there is no information before the LPA regarding the existing situation or the causes thereof. As the development would feature secure waste storage facilities, and would including surface water mitigation measures, there is no basis at present to assume the proposal would result in increased pest activity.

6.12 Statement of Community Involvement

- 6.12.1 The NPPF, Localism Act and the Council's Statement of Community Involvement encourage developers, in the cause of major applications such as this, to undertake public consultation exercise prior to submission of a formal application.

- 6.12.2 A Statement of Community Involvement Report was submitted which states that a public and stakeholder consultation and engagement process ran from January 2023, and which included: a digital consultation via website (live from 9th January 2023); exhibition / in-person events on Wednesday 18th and Saturday 21st January 2023; an online webinar on 23rd January 2023; and distribution of 950 flyers to nearby addresses which publicized the online resources and public events and provided details of a freephone number. As well, direct engagement was conducted with ward councillors / local MP and Assembly member, and local community groups, schools, businesses and media. The Report states that 50 people attended the in-person or webinar events, and 19 surveys were returned. The Council also sent out letters of consultation to local residents in the surrounding area inviting them to make representations on the proposed development and a total of 298 comments were received as outlined above.
- 6.12.3 Public consultation response raised complain that the developer had not contacted certain neighbourhood groups as claimed; had misrepresented the feedback from the community, and had not treated local residents with respect. The local groups mentioned are not statutory consultees, and although contact with these groups would represent best practice, it is not compulsory on the part of the developer. The Council has publicised the application and has received direct feedback from 3rd parties; the LPA does not rely on second hand reports of community feedback in the course of decision making. It is not possible for the LPA to investigate or determine how accurate the developer's statements of community feedback are, but it is noted that the concerns and worries that are outlined in the SCI are consistent with those raised in direct responses received from the public; and that the developer has made some amendments to address them, regardless of whether the public consultation indicates satisfaction with the amendments made.

6.13 Planning Obligations and EIA Screening

- 6.13.1 The application has not been formally screened by the Local Planning Authority (LPA). However, the development does not fall under the category of developments under Schedule 2 of the EIA Regulation 2017 and therefore the development is not an EIA development.
- 6.13.2 The Council has forwarded the heads of terms for a Section 106 agreement, to be agreed and completed prior to determination of this application with the applicant. These have been set out above under Recommendation A of this report. Subject to this agreement, the proposal is considered to accord with the policy requirements of policy DM50 of the Development Management Policies Document, which seeks planning obligations to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

7.0 CONCLUSION AND REASONS FOR RECOMMENDING APPROVAL

7.1 For all the reasons considered above, and weighing up the development plan policies and proposals, and other material considerations including comments received in response to notification and consultation and on the basis that the proposed development provides an acceptable and policy compliant residential scheme for future occupiers and does not unduly impact on the character of the area or the amenities of the residential occupiers of the adjoining, or nearby properties, subject to the attached conditions. In addition, subject to planning conditions and S106 obligations, the proposal would provide mitigation of biodiversity loss and biodiversity uplift compliant with relevant policies. The proposed development would therefore accord with the National Planning Policy Framework (NPPF, 2023) Policies GG2, GG4, GG6, D3, D5, D6, D7, D11, D12, D14, S4, G1, G5, G6, G7, T4, T5, T6/6.1, H1, H4, H5, H6, H10, SI 1, SI 2, SI 4, SI 5, SI 7, SI12; SI 13, E11 of the London Plan (2021), Policy CS1 of the Harrow Core Strategy (2012) and policies DM1, DM2, DM9, DM10, DM12, DM13, DM14, DM15, DM20, DM21, DM22, DM24, DM27, DM28, DM42, DM43, DM44, DM45, DM50 of the Harrow Development Management Policies Local Plan (2013), along with the relevant supplementary guidance.

APPENDIX 1: Conditions and Informatives

Conditions

1 Timing

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990

2. Approved Drawing and Documents

Save where varied by other planning conditions comprising this planning permission or unless otherwise agreed in writing by the local planning authority the development hereby permitted shall be carried out, completed and retained in accordance with the following approved plans and document Schedule of application documents:

3043/201 Rev P08;3043/501 Rev P06; 3043/502 Rev P06; 3043/311 Rev P03; 3043/312 Rev P04; 3043/313 Rev P04; 3043/314 Rev P04; 3043/315 Rev P04; 3043/301 Rev P08; 3043/302 Rev P12; 3043/303Rev P14; 3043/304 Rev P11; 3043/203 Rev P06; 3042/401 Rev P07; 3042/402 Rev P07; 3042/403 Rev P010; 3042/405 Rev P02; 20057-DGE-XX-00-DR-E-6351-S2-P06; 20057-DGE-XX-00-DR-E-6350-S2-P06; Landscape Strategy Plan 10707L.PP.001 Rev E; Urban Greening Factor Calculator 10707L.UGF.02; 3043/321 Rev P05; 3043/331 Rev P02; 3043/200 Rev P02; 3043/202 Rev P03;

Energy Statement Report [S2, Rev 2, dated 01/03/2023] with GLA Carbon Emission reporting spreadsheet; Flat 21 Rev C CLT SAP Worksheet; Flat 23 Rev C CLT SAP Worksheet; Flat 24 Rev C CLT SAP Worksheet; Flat 32 Rev C CLT SAP Worksheet; Residential Development Fire Statement Form Rev C [dated 01/11/23] with Appendix A; Fire Safety Form 3 - Provision of Evacuation Lift Rev B; External Lighting Summary Report [ref: 20057 P03, 01.03.2023]; Ground Investigation report [ref: P2771J1980/CLP v1.0, dated 14 August 2020]; Phase 1 Environmental Report [ref: 1645-P1E-1 issued 18 June 2020]; Schedule of Units Revised Scheme [22/05/2023]; Letter dated 2nd March 2023; Statement of Community Involvement [February 2023]; Planning Statement [March 2023]; Design & Access Statement [February 2023]; Air Quality Assessment [PRO-08490, February 2023]; Arboricultural Report [ref: CTC/PIN/AR3, 3rd February 2023]; Daylight & Sunlight Assessment [Rev. 5, October 2023]; Addendum to Daylight & Sunlight Assessment [February 2023]; Ecological Assessment [10431.EcoAss.vf1, February 2023]; Outline Landscape and Ecological Management Plan [10431.LEMO.vf1, February 2023]; Flood Risk Assessment & Drainage Strategy [152019-FAH-ZZ-XX-RP-C-02-04, dated April 2023]; Updated Baseline Noise Survey [dated 8 September 2023]; Noise report [6477_001R_2-0_CW, ref 6477, dated 14 February 2023]; Travel Plan [UKP-

190-6 Issue 05, February 2023]; Transport Assessment [UKP-190-7 Issue 04, February 2023]; Appendices 1 to 8 for Transport Assessment UKP-190-7 Issue 04 [February 2023] and Appendices 9 to 13 for Transport Assessment UKP-190-7 Issue 04 [February 2023]; Construction Management Plan [Rev C, November 2022]; Outline Construction Logistics Plan [V2, dated 21/02/23]; Refuse Management Strategy [3043_S_001P.02, February 2023]; Road Safety Audit Stage 1 [May 2023]; Utilities report [Rev P04, dated 27th February 2023]; Overheating Statement [Rev 2, 25 September, 2023]; Post-Submission Design Update_P03 [May 2023]

REASON: For the avoidance of doubt and in the interests of proper planning.

3. Demolition and Construction Logistics Plan (Pre-commencement)

No development shall take place, including any works of demolition/ site clearance, until a Detailed Construction Method Statement & Logistics Plan has been submitted to, and approved in writing by, the local planning authority, in accordance with the format and guidance provided by CLOCS and Transport for London – www.tfl.gov.uk. The Detailed Construction Logistics Plan shall provide for:

- a) Programme of work and phasing including implementation of the development, including creation of the Badger Protection Zone (BPZ), relocation of badgers and Natural England licensing process;
- b) Site layout plan;
- c) The parking of vehicles of site operatives and visitors;
- d) HGV access to site including the number of HGV's anticipated;
- e) Loading and unloading of plant and materials;
- f) Storage of plant and materials used in constructing the development; Highway condition (before, during, after);
- g) Measures to control the emission of dust and dirt during construction;
- h) Scheme for recycling/disposing of waste resulting from demolition and construction works;
- i) details showing the frontage/ the boundary of the site enclosed by site hoarding to a minimum height of 2 metres; and
- j) Details on the erection and use of tall plant (e.g. tower cranes (incl. slew radius), mobile cranes (incl. slew radius) and piling rigs)

The development shall be carried out in accordance with the approved Detailed Construction Logistics Plan, or any amendment or variation to it as may be agreed in writing by the local planning authority.

REASON: To minimise the impacts of construction upon the amenities of neighbouring occupiers and to ensure that development does not adversely affect safety on the transport network in accordance with Local Plan Policies DM1 and DM43 and Policy D14 of the London Plan (2021) and to ensure that the transport network impact of demolition and construction work associated with the development is managed in accordance with Policy T7 of the London Plan (2021); as well as ensure proper protection of protected

species on site and to ensure that the proposed details do not interfere with TfL operations or infrastructure.

4. TfL Infrastructure Protection (Pre-commencement)

No development shall take place, including any works of demolition/ site clearance, until the following details have been submitted to, and approved in writing by, the local planning authority:

- a) Details of any structural or civil engineering works, including details of foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), which shall be shown to accommodate the location of the existing London Underground structures.

The development shall be carried out in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

REASON: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2016 Table 6.1 and 'Land for Industry Transport' Supplementary Planning Guidance 2012.

5. Construction Environment Management Plan (Pre-commencement)

No development shall take place, including any works of demolition/ site clearance until a proportionate Construction Environment Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The CEMP, as well as covering other relevant environmental considerations, will set out how contractors will ensure dust and particulates will be controlled, measures to protect the Badger Zone, and how contractors be made aware and have regard to protected species and the practical and legal situation with regard to development. Supporting method statements in relation to protected/priority species shall have particular regard to the requirements of any Natural England license for mitigation in relation to the badgers, features of ecological importance or concern, and INNS (Invasive Non-Native Species).

The CEMP shall be adhered to throughout the demolition and construction phases of the development.

REASON: To provide appropriate safeguards and mitigation for protection of neighbouring amenities and for biodiversity in accordance with the requirements of the National Planning Policy Framework, policies G6 and SI 1 of The London Plan (2021), and local plan policies DM20 and DM21.

6. Tree Protection Measures (Pre-commencement)

No development shall take place, including any works of demolition/ site clearance, until a detailed method statement, based on the draft tree protection measures already provided (Tree Protection Plan (pg 26, 27 / Drwg 002 – Chartwell BS5837 survey) within the BS5837 Impact Assessment, have been provided to, and approved by, the Local Planning Authority. This should include:

- a) Detailed specifications for ‘no-dig’ cellular system in relation to proposed new access roads, hardstanding areas and new parking bays within the RPA of existing retained trees;
- b) Details of schedule of tree protection monitoring & site supervision (for all key activities within RPA of existing trees) by the appointed specialist, as part of updated AMS; and
- c) Methods to improve rooting environment for retained / proposed new trees (ie mulching, biochar, decompaction).

The proposed development shall be completed in full adherence to the arboricultural details approved, unless first otherwise agreed in writing by the Local Planning Authority.

REASON: To ensure that the trees to be retained on the site are not adversely affected by any proposed works.

7. Ground Contamination (Pre-commencement)

Notwithstanding the approved details, no development shall take place, including any works of demolition, until a scheme for identifying, managing and disposing of any potential contamination hazards has first been submitted to, and agreed in writing by, the local planning authority. The details shall include:

- (a) details of a further site investigation to provide information for a detailed assessment of the risks to all receptors that may be affected, including those off site;
- (b) the results of the site investigation and an options appraisal and remediation strategy giving full details of remediation measures and how they are to be undertaken, including the proposed work for any specific areas of concern, the extent of the soil to be removed and details of analysis of the replacement top soil;
- (c) the management of contamination risk at the site; and
- (d) a verification plan providing details of the data that will be collected in order to demonstrate that how the works set out in the remediation strategy would be undertaken and identifying any requirements for longer-term monitoring of pollutant leakages, maintenance and arrangements for contingency action.

The proposed development shall be carried out in accordance with the scheme so agreed.

REASON: To ensure that the development does not activate or spread potential contamination at the site and that the land is appropriately remediated for the approved uses.

8. Contamination Completion Certificate

Pursuant to the details approved under Condition 7 attached to this permission, prior to the first occupation of this development, a completion certificate demonstrating that the proposal has been implemented in accordance with details as so approved under Condition 7 shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure that the land is appropriately remediated for the approved uses.

9. Japanese Knotweed (Pre-commencement)

No development shall take place, including works for demolition/ site clearance, until a detailed Method Statement for guaranteed / warranted eradication of the Japanese Knotweed on site has been submitted to and agreed in writing by the Local Planning Authority. This shall include:

- (a) An updated site survey;
- (b) Details of how the Japanese Knotweed is proposed to be treated, removed and eradicated, with a timetable, proposed method, drawings identifying, locating and detailing the method.

The removal and appropriate disposal of the Japanese Knotweed shall be carried out in accordance with the approved details.

REASON: To safeguard the ecology and biodiversity of the area and to ensure that measures are agreed and put in place to remove Japanese Knotweed and to prevent further contamination on and off site.

10. Site Levels (Pre-commencement)

No demolition or site works shall commence until details of the levels of the building(s), road(s) and footpath(s) in relation to the adjoining land and highway(s), and any other changes proposed in the level of the site, have been submitted to, and approved in writing by the Local Planning Authority. Sufficient levels detail is required to understand the proposals in relation to the existing levels around the existing trees and the linkage of the proposed levels to the existing levels of the surrounding external wider site, outside the development site. The development shall be carried out in accordance with the details so agreed.

REASON: To ensure that the works are carried out at suitable levels in relation to the highway and adjoining properties in the interests of the amenity of neighbouring residents, the appearance of the development, drainage, gradient of access and future highway improvement.

11. Biodiversity Details and Management (Pre-commencement)

The development herein approved shall not be commenced until the following have been submitted to, and approved in writing by, the Local Planning Authority:

- a) A finalised Landscaping and Ecology Management Plan, including an updated assessment of post-development biodiversity unit value;
- b) Provision of shelters for bats and birds, on a one single or multi-occupancy shelter per residential unit basis, with at least 75% of the total to be incorporated within the fabric of the new buildings; as well as shelters for invertebrates and any other species to be provided for on site. Target species should be informed by the Harrow BAP and existing species records and survey data for the local area;
- c) A timetable for the delivery of urban greening and ecological measures at the site;
- d) how BNG features will be managed and monitored to maintain and enhance their value, including any replacements during the establishment phase (to run for three years from the commencement of construction);
- e) year by year schedule of the timing of operations and who has responsibility for these and for ensuring they are undertaken.
- f) how the plan will be updated at 5 year intervals; and
- g) how these operations will be funded over the lifetime of the new development (a period of no less than 30 years), during and following construction.

The development shall be carried out in accordance with the details as so agreed and retained thereafter, except as varied by agreement in writing with the Local Planning Authority.

REASON: To safeguard the ecology and biodiversity of the area in accordance with the requirements of the National Planning Policy Framework, policies G6 and G7 The London Plan, and local plan policies DM20 and DM21.

12. Green Roof Details

No works other than those relating to the proposed Badger Protection Zone hereby permitted shall not commence until details of the green and biodiverse roofs with solar PV panels shown on the approved plans shall be submitted to and approved in writing by the Local Planning Authority. The details shall include:

- a) Its location, extent, specification (plant species and soil depth), landscape integration, integration with other roof plant or renewable energy infrastructure, structural integrity, construction, operation and access. To include of a biodiverse green roof combined with bisolar PV panels and green roofs on refuse stores.
- b) Planting scheme (time of planting, plant species, plant schedule and numbers, watering), to include native plant species to be planted or seeded.
- c) Habitat features to be incorporated (specific to the green roof), including invertebrate shelters/ invertebrate opportunities such as brick / rubble piles, dead wood or bare sandy substrates.
- d) Section/profile drawings showing the green roof detail and build up, soil/ growing medium depth, different build up layers of material and membranes including water reservoirs, substrates, topography, edge details and relationship to the solar panels. This should be in accordance with the GRO Code and the current Biodiversity Metric green roof condition assessment guidance.
- e) Plans to show clearly its location, extent, drainage catchment areas (if relevant), inlets and outflows.

The development shall not be completed otherwise than in accordance with the green roof details so approved and shall thereafter be so maintained.

REASON: To reduce flood risk, enhance the biodiversity and to contribute to sustainability in accordance policies G1, G6 and SI 12 of The London Plan (2021) and policies DM12, DM20, and DM21 of the Harrow Development Management Policies Local Plan (2013)

13. Fire Safety

The proposed development shall be implemented in accordance with the approved revised Fire Safety Statement and accompanying documents, Residential Development Fire Statement Form Rev C [dated 01/11/23] with Appendix A and Fire Safety Form 3 - Provision of Evacuation Lift Rev B

The development shall be operated in accordance with the approved details in perpetuity, unless otherwise agreed in writing with the Local Planning Authority.

REASON: To ensure that the fire safety of the proposed building is managed in a satisfactory manner and that the development contributes to fire safety in line with Policy D12A of the London Plan (2021). To ensure appropriate fire safety measures are approved before development is occupied.

14. Car Park Management Plan

The development hereby permitted shall not progress beyond damp proof course level until a Car Parking Design and Management Plan has been submitted to, and agreed in writing by, the Local Planning Authority. The plan shall set out the following:

- a) Finalised detailed design of the proposed internal access road.
- b) Details of general spaces that are to be 'active' electric vehicle charging point spaces and are to be 'passive' electric vehicle charging point spaces. The plan should outline the provision of one active Electric Vehicle Charging Point for at least 20% of spaces from the outset with the remaining 80% passive and the mechanism for converting passive provision to active should demand increase.
- c) Details of Disabled persons parking spaces in accordance with the levels set out in Table 10.6 of the London Plan 2021. The plan should outline the mechanism for converting standard spaces to disabled parking should demand increase.
- d) Mechanism for increasing the number of general spaces that have an 'active' electric vehicle charging point if monitoring demonstrates additional demand.
- e) Details of the allocation and management of the general and accessible car parking spaces.
- f) Details of monitoring, management and enforcement procedures for parking within the site.

The development shall be carried out in accordance with the details so agreed, and which shall be implemented prior to first occupation of the development and shall be retained as such thereafter.

REASON: To ensure that the car parking is managed in a satisfactory manner and that the development contributes to more sustainable travel in accordance with Local Plan DM42 and Policy T6 and Policy T6.5 of the London Plan (2021).

15. Cycle Parking

The development hereby permitted shall no progress beyond damp proof course level until details of shelters, racks, dimensions and location of the cycle parking spaces have been submitted to and approved in writing by the local planning authority. A minimum of 63 long stay and 6 short stay stands shall be provided. At least 5% of the long stay stands shall be accessible. The cycle storage shall be made available prior to occupation and shall be retained thereafter.

REASON: To ensure the satisfactory provision of safe cycle storage facilities, to provide facilities for all the users of the site and in the interests of highway safety and sustainable transport, in accordance with policy T5 of The London

Plan 2021 and policy DM 42 of the Harrow Development Management Policies Local Plan (2013).

16. Disposal of Foul Water

No development (other than demolition works/ those relating to the proposed Badger Protection Zone) hereby permitted shall be commenced until works for the disposal of sewage have submitted to, and approved in writing by, the local planning authority. The development shall be carried out in accordance with the details as so agreed and retained thereafter.

REASON: To ensure that adequate drainage facilities are provided in accordance with policy SI 5 of The London Plan (2021).

17. Disposal of Surface Water

No development (other than demolition works / those relating to the proposed Badger Protection Zone) hereby permitted shall be commenced until works for the disposal of surface water have been submitted to, and approved in writing by, the local planning authority. The development shall be carried out in accordance with the details as so agreed and retained thereafter.

REASON: To ensure that adequate drainage facilities are provided.

18. Surface Water Attenuation

No development (other than demolition works/ those relating to the proposed Badger Protection Zone) hereby permitted shall be commenced until surface water attenuation and storage works have been submitted to, and approved in writing by, the local planning authority. The development shall be carried out in accordance with the details as so agreed and retained thereafter.

REASON: To prevent the increased risk of flooding, reduce and mitigate the effects of flood risk following guidance in the National Planning Policy Framework.

19. Permeable Paving

Notwithstanding the approved details and prior to the commencement of development (other than demolition works/ those relating to the proposed Badger Protection Zone), full details of the permeable paving including cross-sections and details relating to the long-term maintenance and management of the on-site drainage shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the details as so agreed and retained thereafter.

REASON: To ensure that the development has adequate drainage facilities, to reduce and mitigate the effects of flood risk and would not impact the character and appearance of the development.

20. Landscaping

The development hereby approved shall not progress beyond damp proof course / other than those relating to the proposed Badger Protection Zone level until there has been submitted to, and approved by, the local planning authority, a scheme of hard and soft landscape works for the site. The hard and soft landscape details are to include the following:

- a) A scheme for detailed hard and soft landscaping of the development, to include details of the plantings and replacement trees, climbing plant supports / trellis / ground based green walls, growing medium, tree planting, tree pits, rain gardens and SUDs measures and so on. Soft landscaping works shall include: planting plans (at a scale not less than 1:100), written specification of planting and cultivation works to be undertaken and schedules of plants, noting species, plant sizes, plant container sizes (all at time of planting) and proposed numbers / densities and an implementation programme. Planting which may provide benefits in terms of improving air quality and pollinators are encouraged;
- b) The hard surfacing and hard landscape details shall include samples to show the texture and colour of the materials to be used and information about their sourcing/manufacturer. Details and specification for the proposed supports and fixings for plants, landscape structures and any pergolas and climbing plant supports, including proposed material and source /manufacturer and irrigation / watering for plants and detailed drawings of such; for all communal areas;
- c) Details of any retaining walls at a scale of 1:10 or 1:20;
- d) Details of the proposed green walls, planting along proposed fencing and other landscaping and tree planting.
- e) Details of all furniture and seating including information about the manufacturer, material and source;
- f) Boundary treatments including all vehicle and pedestrian/ access gates;
- g) Full scale metric cross sections and elevations for the communal open amenity space and play area (at a scale of not less than 1:100 and preferably 1:50) including the proposed details for level changes;
- h) Information indicating areas of accessible access for communal amenity space
- i) Detailed drawings (at a scale of not less than 1:100), and a specification of the natural type play equipment to be installed, including proposed manufacturer, material and source and specification of the surface treatment within the play areas, as well as border treatment to separate play areas from the roadway, which shall include provisions for all ages;

- j) Details of proposed treatment to allow for separation between play areas and the proposed internal road;
- k) Details of the bin stores materials;
- l) Proposed implementation and implementation programme, including a period of 5 year period for replacements of soft landscape;
- m) Landscape Management Plan and Landscape Maintenance of the hard and soft landscaping within the development, to include a landscape management plan for the whole of the proposed development, including long term design objectives, management responsibilities, programme of works, maintenance schedules and monitoring procedures for all landscaped areas, hard and soft landscape, green roofs, biodiverse green roofs, rain gardens, any pergola, play elements, ground based green walls and landscape structures for plant growth. The details shall also include a programme of maintenance, maintenance responsibilities, a maintenance calendar / plant replacement for 30 years of the development (reporting on implementation objectives for first year of maintenance, years 2-5, and 6 years and onwards) specifically for the planted landscape structures and green/biodiverse roofs.

This would be expected to set out, graphically and / or in writing, the overall functional and aesthetic objectives of the landscape scheme and the steps (eg legal arrangements including ownership and management responsibilities, planned maintenance tasks, any phased works, management programme of works, monitoring procedures etc.) that will be taken after implementation to ensure that the scheme becomes successfully established and reaches maturity.

REASON: To safeguard the appearance and character of the area and the development, and to support and ensure the provision of satisfactory biodiversity mitigation measures on site, in compliance with policies G6 and G7 of The London Plan, policies DM1, DM20, DM21, and DM22 of the Harrow Development Management Policies Local Plan (2013).

21. Lighting Strategy

Notwithstanding the approved details, the development hereby permitted shall not progress beyond damp proof course level, until final details of the lighting of all external communal areas and other external areas (including buildings) within the site has been submitted to the Local Planning Authority. This includes all details of the lighting including sourcing/ manufacturer details, location, height, elevations, type, direction of light sources, specification, elevations, light spillage and lighting levels. The exterior lighting would need to take account of Secure by Design principles, light spillage and impacts onto the adjacent railway, and any biodiversity recommendations or requirements, such sensitive lighting the benefit of nocturnal species (eg bats and badgers), and to provide lighting to minimise lightspill within the badger protection zone in the western side of the site.

Best practice measures are detailed in the Bat Conservation Trust Guidance Note 08/18 Bats and Artificial Lighting in the UK. The development shall be implemented in accordance with the approved details and shall be retained as such thereafter.

REASON: To ensure that the development incorporates lighting that contributes to Secured by Design principles, does not interfere with the operations of the adjacent railway and TfL infrastructure, achieves a high standard of quality, minimises energy use and, in particular avoid impacts on nocturnal species on site.

22. Materials

Notwithstanding the details shown on the approved plans, the development hereby permitted shall not proceed above damp-proof course level until samples of the materials to be used in the construction of the external surfaces noted below (but not limited to) have been made available to view on site, and approved in writing by, the local planning authority:

- a) Facing materials for the building, including brickwork bond details, down pipes and flues;
- b) All windows / doors, including those to all servicing areas and reveals;
- c) A sample casement of the proposed angled windows to the southern elevations of Blocks 2 and 3; and
- d) Balconies including balustrade detail, privacy screens for all northern balcony openings (including those facing north at an angle), soffits, and balcony underside finish.

The development shall be carried out in accordance with the approved details and shall thereafter be retained.

REASON: To ensure that the development is carried out to the highest standards of architecture and materials.

23. Acoustic Fence

The development hereby approved shall not progress beyond damp proof course level until details of the proposed acoustic fencing has been submitted to, and approved in writing by, the Local Planning Authority. Thereafter, the scheme shall be implemented and maintained in full compliance.

REASON: To safeguard the amenity and living conditions of future and neighbouring residents.

24. ASHP Details

The development hereby approved shall not progress beyond damp proof course level until details of the proposed Air Source Heat Pump(s), which shall include visual screening and projected noise levels and noise mitigation, has been submitted to and approved in writing by the Local Planning Authority.

The scheme shall be implemented and maintained in full compliance with the approved measures prior to the first occupation of the development.

REASON: To safeguard the amenity of future and neighbouring residents.

25. Secure by Design Accreditation

Prior to the first occupation of the development, evidence of Secured by Design Certification shall be submitted to the Local Planning Authority in writing to be agreed. Secure by design measures shall be implemented and the development shall be retained in accordance with the approved details.

REASON: In the interests of creating safer and more sustainable communities and to safeguard amenity by reducing the risk of crime and the fear of crime. the Local Plan (2013), and Section 17 of the Crime & Disorder Act 1998.

26. Communal Facilities

Prior to the first occupation of the residential units hereby permitted, details of a strategy for the provision of communal facilities for television reception (eg. aerials, dishes and other such equipment) shall be submitted to and approved in writing by the Local Planning Authority. Such details shall include the specific size and location of all equipment. The approved details shall be implemented prior to the first occupation of the residential units and shall be retained thereafter. No other television reception equipment shall be installed on the building without the prior written approval of the Local Planning Authority.

REASON: To ensure that any telecommunications apparatus and other plant or equipment that is required on the exterior of the buildings preserves the high quality design of the buildings and spaces in accordance with policy D3 of the London Plan (2021), and DM49 of the Development Management Policies Local Plan (2013), and to ensure that the development achieves a high standard of amenity for future occupiers the buildings in accordance with policy DM 1 of the Development Management Policies Local Plan (2013).

27. Noise

The proposed development shall be implemented in accordance with the approved Noise Impact Assessment documents, Noise report [6477_001R_2-0_CW, ref 6477, dated 14 February 2023] and Updated Baseline Noise Survey [dated 8 September 2023], and shall be maintained as such thereafter.

REASON: To ensure the development achieves a satisfactory standard of living conditions for future occupiers.

28. Landscaping Implementation

All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the building(s), or the completion of the development, whichever is the sooner. Any existing or new trees or shrubs which, within a period of 5 years from the completion of the development, die, are removed, or become seriously damaged or diseased, shall be replaced in the next planting season, with others of a similar size and species, unless the local authority agrees any variation in writing.

REASON: To safeguard the appearance and character of the area, and to enhance the appearance of the development, in compliance with policies DM 1, DM 22 and DM 23 of the Harrow Development Management Policies Local Plan (2013).

29. Refuse Storage

The refuse and waste bins shall be stored at all times, other than on collection days, within the designated refuse storage areas as shown on the approved plans.

REASON: To safeguard the character and appearance of the area.

30. Glazing

No window(s) / door(s), other than those shown on the northern flank elevations shall be installed in the without the prior permission in writing of the local planning authority.

REASON: To safeguard the amenity of neighbouring residents.

31. Obscure Glazing

The windows in the northern flank elevations above lower ground floor level of all buildings of the approved development shall:

- a) be of purpose-made obscure glass,
- b) be permanently fixed closed below a height of 1.7 metres above finished floor level and shall thereafter be retained in that form.

REASON: To safeguard the amenity of neighbouring residents.

32. Permitted Development Restriction 1

The development hereby permitted shall be used for Class C3 dwellinghouse(s) only and notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking or re-enacting that Order with or without modification), no development within Schedule 2, Part 3, Class L shall take place.

REASON: To enable the Local Planning Authority to fully consider the effects of development normally permitted by the Town and Country Planning (General Permitted Development) Order 2015 to maintain mixed, balanced, sustainable and inclusive communities and in the interests of residential and visual amenity.

33. Accessibility

The development hereby permitted shall be constructed to include 90 per cent of the new homes to meet Building Regulations requirement Part M M4(2) 'accessible and adaptable dwellings' with the remaining 10 per cent meeting Building Regulations requirement Part M M4(3) 'wheelchair user dwellings' and thereafter retained in that form.

REASON: To ensure that the development is capable of meeting 'Accessible and Adaptable Dwellings' standards.

34. Energy and Sustainability

- A. The development shall be undertaken in accordance with the approved Energy & Sustainability Statement (Energy Statement Report [S2, Rev 2, dated 01/03/2023], with GLA Carbon Emission reporting spreadsheet).
- B. Within 3 months (or other such period agreed in writing by the Local Planning Authority) of the final completion of the development a post construction assessment shall be undertaken demonstrating compliance with the approved Energy and Sustainability Statement,

which thereafter shall be submitted to the Local Planning Authority in writing to be agreed the Local Planning Authority for written approval.

REASON: To ensure the delivery of a sustainable development in accordance with the National Planning Policy Framework 2021 and local policies.

35. Air Quality Measures

A. The development shall be undertaken in accordance with the approved Air Quality Assessment (Air Quality Assessment [PRO-08490, February 2023]).

B. Within 3 months (or other such period agreed in writing by the Local Planning Authority) of the final completion of the development, a completion certificate demonstrating that the proposal has been implemented in accordance with the above approved Air Quality Assessment shall be submitted to the Local Planning Authority.

REASON: To ensure the delivery of a sustainable development in accordance with the National Planning Policy Framework 2021, policy SI 1 of the London Plan, and local policies.

36. Retained Trees

No retained tree shall be cut down, uprooted, destroyed, pruned, cut or damaged in any way during the development phase and thereafter within 5 years of completion of development., other than in accordance with approved plans or as permitted by prior approval in writing from the local authority.

REASON: to safeguard and enhance the character and amenity of the area, and in accordance with DM22 Trees and Landscaping and pursuant to Section 197 of the Town and Country Planning Act 1990

Informatives

1. Policies

The following policies are relevant to this decision:

- **National Planning Policy Framework (2023)**
- **The London Plan (2021):** GG2, GG4, GG6, D3, D5, D6, D7, D11, D12, D14, S4, G1, G5, G6, G7, T4, T5, T6/6.1, H1, H4, H5, H6, H10, SI 1, SI 2, SI 4, SI 5, SI 7, SI12; SI 13, E11
- **Harrow Core Strategy (2012):** CS1
- **Harrow Development Management Policies Local Plan (2013):** DM1, DM2, DM9, DM10, DM12, DM13, DM14, DM15, DM20, DM21, DM22, DM24, DM27, DM28, DM42, DM43, DM44, DM45, DM50

Supplementary Planning Documents:

- Technical housing standards - nationally described space standard (2015).
- Mayor of London Play and Informal Recreation Supplemental Planning Guidance (2012)
- Mayor of London Housing Design Standards (2023)
- Mayor of London Affordable Housing and Viability Supplementary Planning Guidance (2017)
- Supplementary Planning Document Residential Design Guide (2010)
- Supplementary Planning Document: Planning Obligations and Affordable Housing (2013)
- Supplementary Planning Document: Tall Buildings (Building Heights) (2023)
- Code of Practice for Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (2106)

2. Pre-application engagement

Statement under Article 35(2) of The Town and Country Planning (Development Management Procedures) (England) Order 2015 This decision has been taken in accordance with paragraphs 39-42 of The National Planning Policy Framework. Pre-application advice was sought and provided and the submitted application was in accordance with that advice.

3. Considerate Contractor Code of Practice

The applicant's attention is drawn to the requirements in the attached Considerate Contractor Code of Practice, in the interests of minimising any adverse effects arising from building operations, and in particular the limitations on hours of working.

4. Party Wall Act

The Party Wall etc. Act 1996 requires a building owner to notify and obtain formal agreement from adjoining owner(s) where the building owner intends to carry out building work which involves:

1. work on an existing wall shared with another property;
2. building on the boundary with a neighbouring property;
3. excavating near a neighbouring building, and that work falls within the scope of the Act.

Procedures under this Act are quite separate from the need for planning permission or building regulations approval.

“The Party Wall etc. Act 1996: Explanatory booklet” is available free of charge from: Communities and Local Government Publications, PO Box 236, Wetherby, LS23 7NB

Please quote Product code: 02 BR 00862 when ordering. Also available for download from the CLG website:

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/133214.pdf>

Tel: 0870 1226 236 Fax: 0870 1226 237

Textphone: 0870 1207 405

E-mail: communities@twoten.com

5. Liability for Damage to Highway

The applicant is advised to ensure that the highway is not interfered with or obstructed at any time during the execution of any works on land adjacent to a highway. The applicant is liable for any damage caused to any footway, footpath, grass verge, vehicle crossing, carriageway or highway asset. Please report any damage to nrswa@harrow.gov.uk or telephone 020 8424 1884 where assistance with the repair of the damage is available, at the applicants expense. Failure to report any damage could result in a charge being levied against the property.

6. Surface and foul water connections

The applicant is advised that the Drainage Authority in Harrow recommends the submission of a drainage plan, for their approval, indicating all surface and foul water connections and their outfall details. Please also note that separate systems are used in Harrow for surface water and foul water discharge. Please email infrastructure@harrow.gov.uk with your plans.

7. SUDs informative

The applicant is advised that surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SUDS). SUDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible.

SUDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SUDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity.

Where the intention is to use soak ways they should be shown to work through an appropriate assessment carried out under Building Research Establishment

(BRE) Digest 365.

Support for the SUDS approach to managing surface water run-off is set out in the National Planning Policy Framework (NPPF) and its accompanying technical guidance, as well as the London Plan. Specifically, the NPPF (2023) gives priority to the use of sustainable drainage systems in the management of residual flood risk and the technical guidance confirms that the use of such systems is a policy aim in all flood zones. The London Plan (2021) requires development to utilise sustainable drainage systems unless there are practical reasons for not doing so. Sustainable drainage systems cover the whole range of sustainable approaches to surface drainage management. They are designed to control surface water run-off close to where it falls and mimic natural drainage as closely as possible. Therefore, almost any development should be able to include a sustainable drainage scheme based on these principles.

The applicant can contact Harrow Drainage Section for further information.

8. TfL Infrastructure

The applicant is advised to contact TfL Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; drainage; excavation; construction methods; tall plant; scaffolding; security; boundary treatment; safety barriers; landscaping and lighting. The applicant is further advised that the onus is on the developer to ensure that any obligations that fall outside the purview of planning with regard to notices, communication and/or obligations relating to TfL property and operations are fulfilled.

9. Designing Out Crime

For further information regarding Secure By Design, the applicant can contact the North West London Designing Out Crime Group on the following: DOCOMailbox.NW@met.police.uk

10. Fire Safety

Fire Safety Statement. The submission/approval of the Fire Safety Statement does not replace the need for building regulation approval in relation to fire safety, nor does it convey or imply any approval under those regulations.

11. Thames Water

The applicant can contact Thames Water developer services by email: developer.services@thameswater.co.uk or by phone: 0800 009 3921 or on Thames Water website www.developerservices.co.uk for drainage connections consent.

12. Street Numbering

Harrow Council is responsible for the naming and numbering of new or existing streets and buildings within the borough boundaries. The council carries out these functions under the London Government Act 1963 and the London Building Acts (Amendment) Act 1939.

All new developments, sub division of existing properties or changes to street names or numbers will require an application for official Street Naming and Numbering (SNN). If you do not have your development officially named/numbered, then then it will not be officially registered and new owners etc. will have difficulty registering with utility companies etc.

You can apply for SNN by contacting technicalservices@harrow.gov.uk or on the following link.

http://www.harrow.gov.uk/info/100011/transport_and_streets/1579/street_naming_and_numbering

13. Compliance with Planning Conditions

Compliance with Planning Conditions Requiring Submission and Approval of Details Before Development Commences - You will be in breach of planning permission if you start development without complying with a condition requiring you to do something before you start. For example, that a scheme or details of the development must first be approved by the Local Planning Authority. Carrying out works in breach of such a condition will not satisfy the requirement to commence the development within the time permitted.- Beginning development in breach of a planning condition will invalidate your planning permission.

- If you require confirmation as to whether the works you have carried out are acceptable, then you should apply to the Local Planning Authority for a certificate of lawfulness.

14. Mayoral CIL

Please be advised that approval of this application (either by Harrow Council, or subsequently by the Planning Inspectorate if allowed on appeal following a refusal by Harrow Council) will attract a Community Infrastructure Levy (CIL) liability, which is payable upon the commencement of development. This charge is levied under s.206 of the Planning Act 2008 Harrow Council, as CIL collecting authority, has responsibility for the collection of the Mayoral CIL

The Provisional Mayoral CIL liability for the application, based on the Mayoral CIL levy rate for Harrow of £60/sqm is £174,960

The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).

You are advised to visit the planning portal website where you can download the appropriate document templates.

Please complete and return the Assumption of Liability Form 1 and CIL Additional Information Form 0.

https://ecab.planningportal.co.uk/uploads/1app/forms/form_1_assumption_of_liability.pdf

https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf

If you have a Commencement Date, please also complete CIL Form 6:

https://ecab.planningportal.co.uk/uploads/1app/forms/form_6_commencement_notice.pdf

The above forms should be emailed to HarrowCIL@Harrow.gov.uk. Please note that the above forms must be completed and provided to the Council prior to the commencement of the development; failure to do this may result in surcharges and penalties.

15. Harrow CIL

Harrow has a Community Infrastructure Levy which applies Borough wide for certain developments of over 100sqm gross internal floor space.

Harrow's Charges are:

Residential (Use Class C3) - £110 per sqm;

Hotels (Use Class C1), Residential Institutions except Hospitals, (Use Class C2), Student Accommodation, Hostels and HMOs (Sui generis) - £55 per sqm;

Retail (Use Class A1), Financial & Professional Services (Use Class A2), Restaurants and Cafes (Use Class A3) Drinking Establishments (Use Class A4) Hot Food Takeaways (Use Class A5) - £100 per sqm

All other uses - Nil.

The Provisional Harrow CIL liability for the application, based on the Harrow CIL levy rate for Harrow of £110/sqm plus indexation is £508,346.28.

This amount includes indexation. The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).

The CIL Liability is payable upon the commencement of development. You are advised to visit the planningportal website where you can download the relevant CIL Forms. Please complete and return the Assumption of Liability Form 1 and CIL Additional Information Form 0.

https://ecab.planningportal.co.uk/uploads/1app/forms/form_1_assumption_of_liability.pdf



https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf

If you have a Commencement Date, please also complete CIL Form 6:

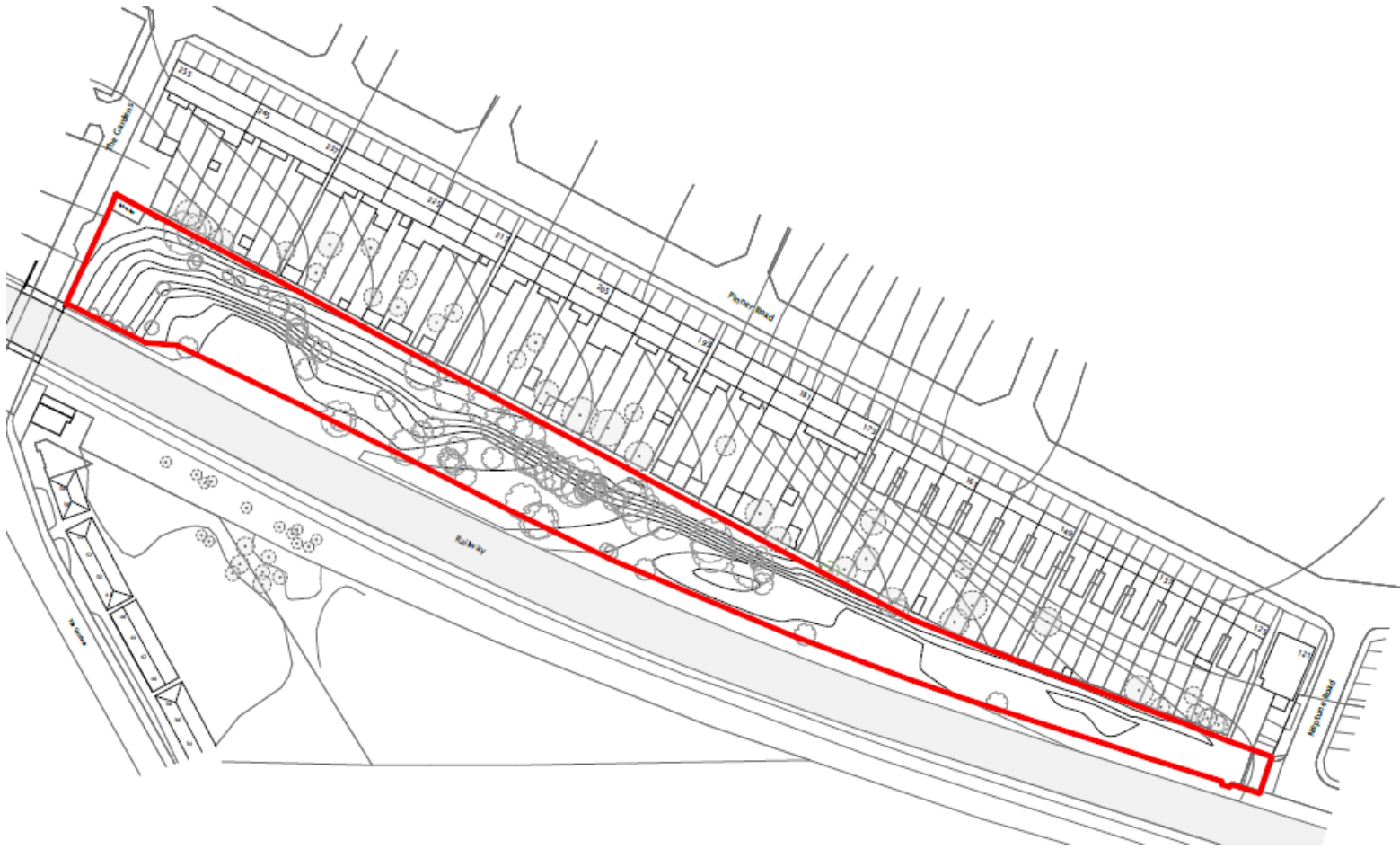
https://ecab.planningportal.co.uk/uploads/1app/forms/form_6_commencement_notice.pdf

The above forms should be emailed to HarrowCIL@Harrow.gov.uk. Please note that the above forms must be completed and provided to the Council prior to the commencement of the development; failure to do this may result in surcharges.

CHECKED

 <p>Orla Murphy Head of Development Management 9th November 2023</p>	 <p>Viv Evans Chief Planning Officer 9th November 2023</p>
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APPENDIX 2: SITE PLAN



APPENDIX 3: SITE PHOTOGRAPHS

Views within the site:



Looking from within site to easter (existing) access on Neptune Road





Eastern end - Facing west (away from Neptuen Road)





Looking towards houses along Pinner Road





Boundary buffer and ground level changes from site to Pinner Road properties



Houses further along (moving west towards The Gardens)



And along southern boundary





Evidence of badger activity (digging under fence)



Monitoring camera



Houses along Pinner Road towards the western end of the site



Western end of the site along the southern boundary – railway bridge over The Gardens visible in distance



Looking down to The Gardens from high point of southern boundary (where Badger zone would be)



Looking back from western end of site towards the east



Looking east again

Views from outside the site:



Existing entrance off Neptune Road



Neptune Road (looking towards Pinner Road)







Neptune Road looking towards industrial units





Looking from Pinner Road to The Gardens



Western end of site off The Gardens



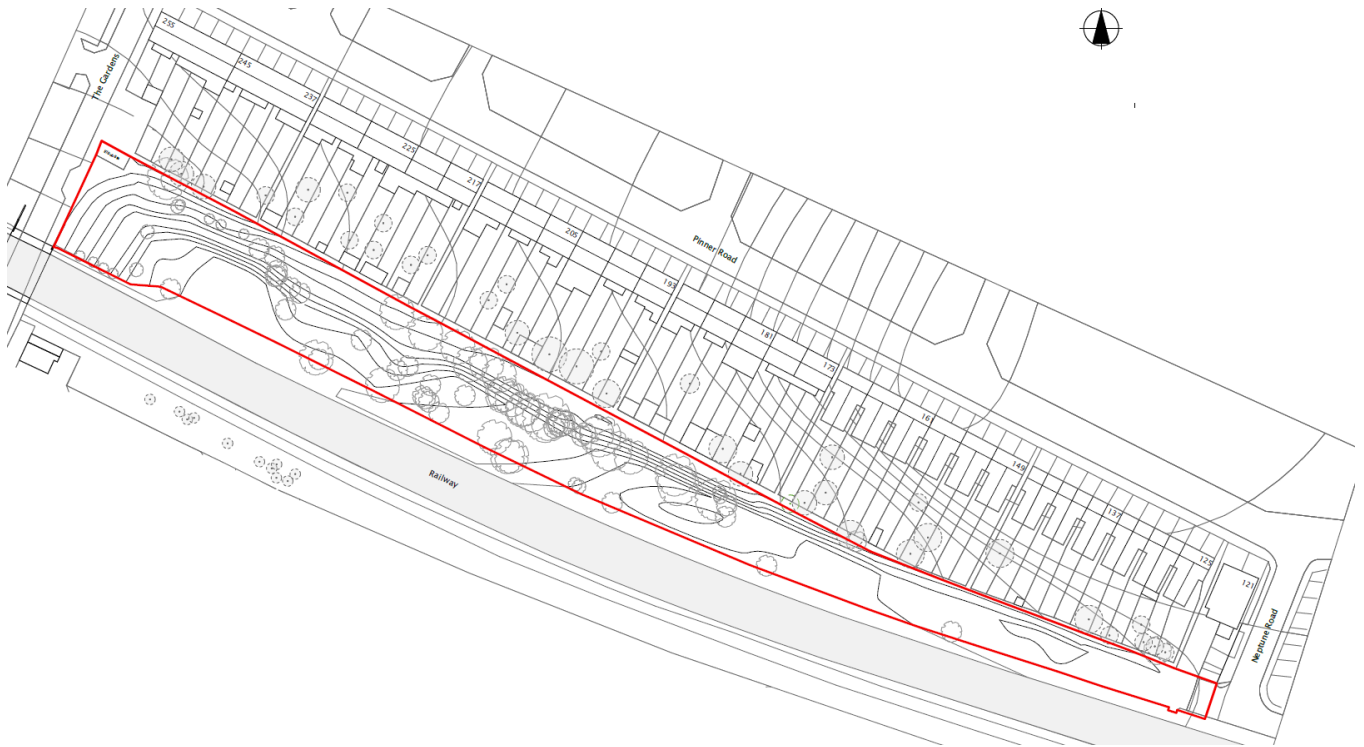




Looking back towards Pinner Road from The Gardens

APPENDIX 4: PLANS AND ELEVATIONS

Existing site plan:



Proposed Site Plans:





Proposed Site Elevations:



Block 1 - North Site elevation

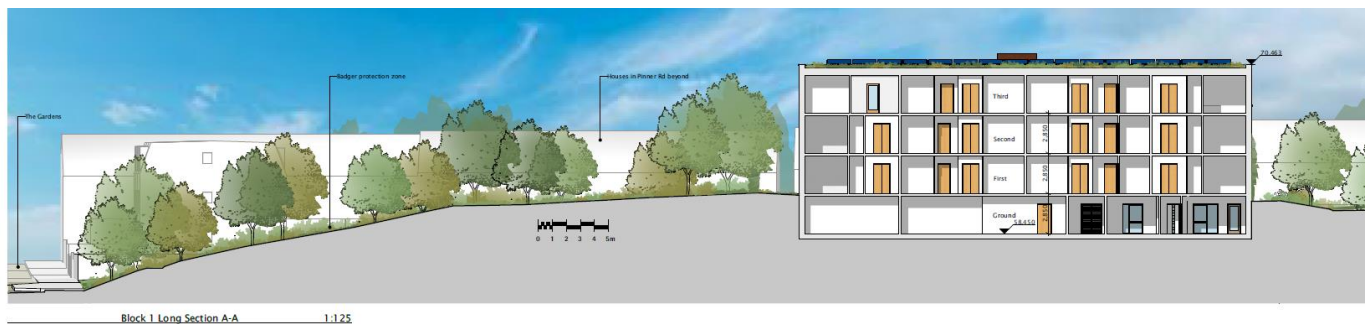


Block 3 (left) and 2 (right) - North Site elevation

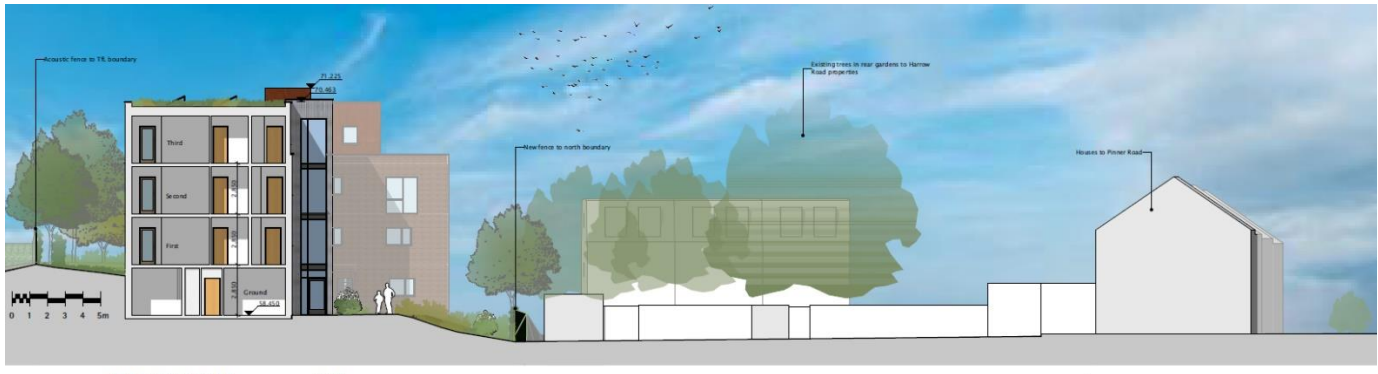


South Elevations – Blocks 1-3

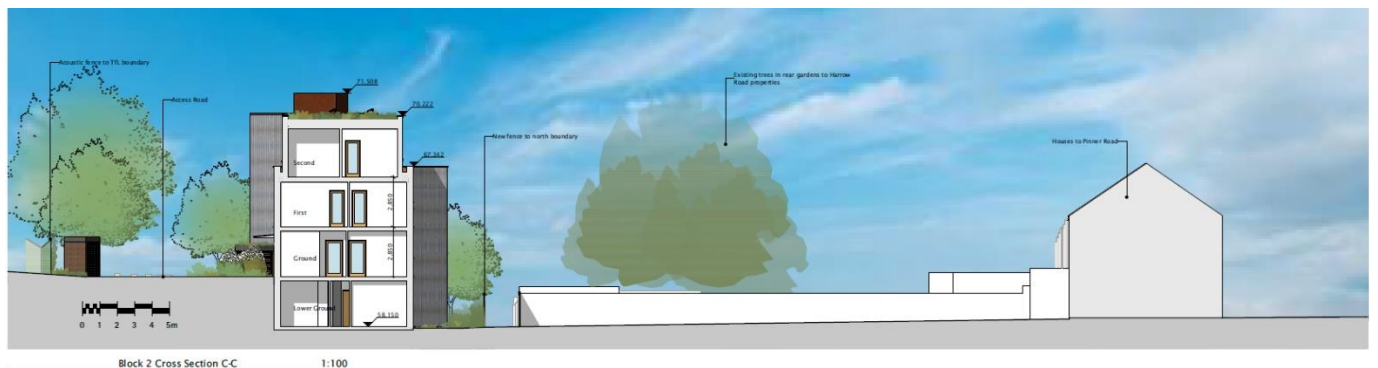
Proposed Sections:



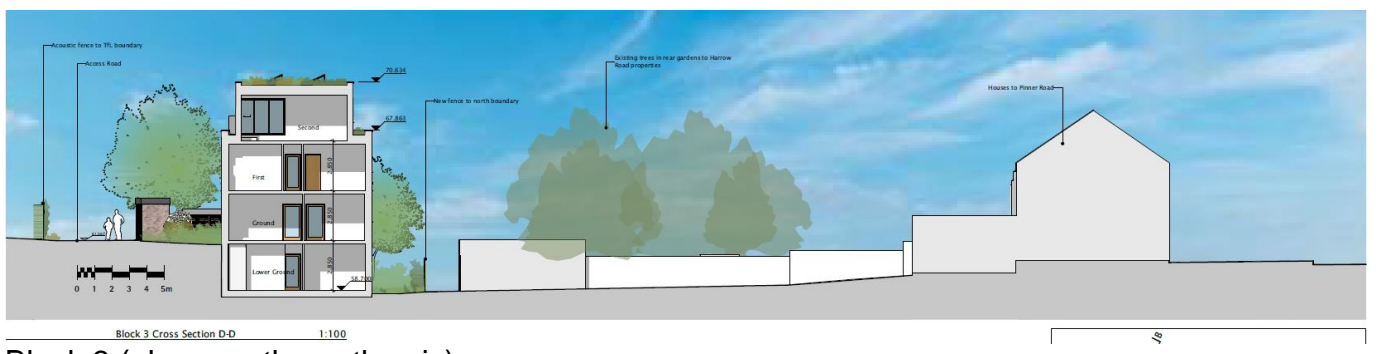
Block 1 (along roughly east-west axis)



Block 1 (along north-south axis)



Block 2 (along north-south axis)



Block 3 (along north-south axis)

Proposed Elevations:



Block 1 - North Elevation

Block 1 - Northern Elevation (facing rear of houses along Pinner Road)

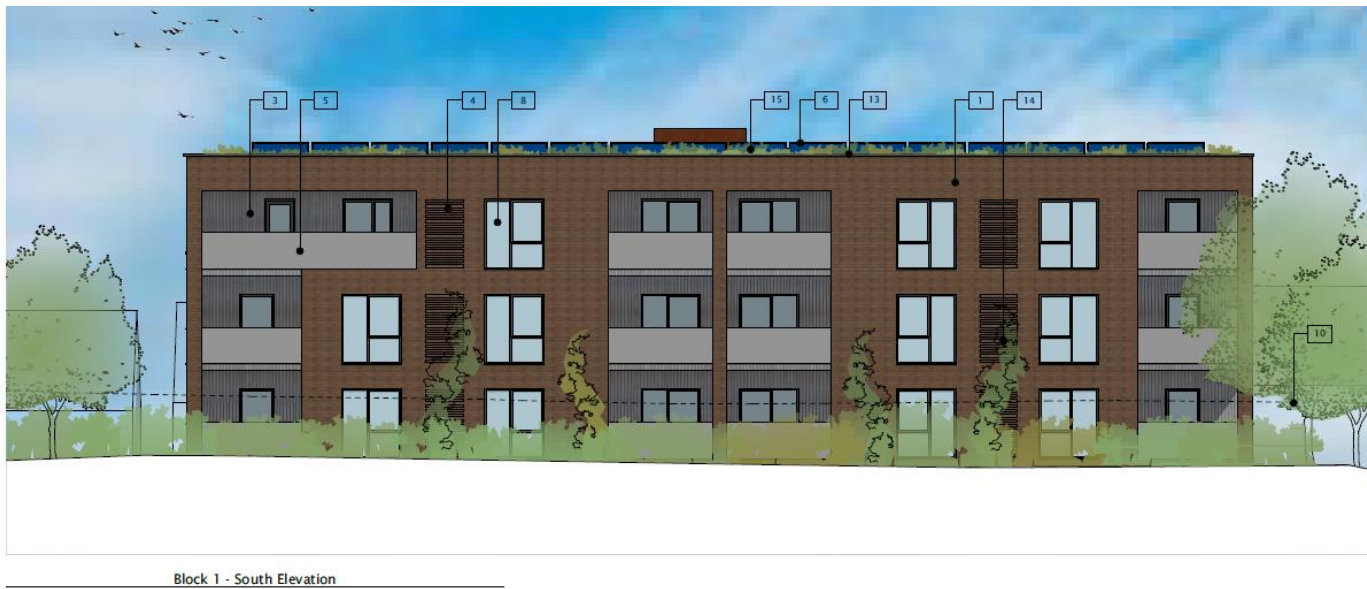


Block 1 - West Elevation

Block 1 - Western Elevation



Block 1 - Eastern Elevation



Block 1 - Southern Elevation (facing railway)



Block 2 - North Elevation

Block 2 - Northern Elevation (facing rear of houses along Pinner Road)



Block 2 - West Elevation

Block 2 - Western Elevation



Block 2 - East Elevation

Block 2 - Eastern Elevation



Block 2 - South Elevation

Block 2 - Southern Elevation (facing railway)



Block 3 - Northern Elevation (facing rear of houses along Pinner Road)



Block 3 - West Elevation

Block 3 - Western Elevation



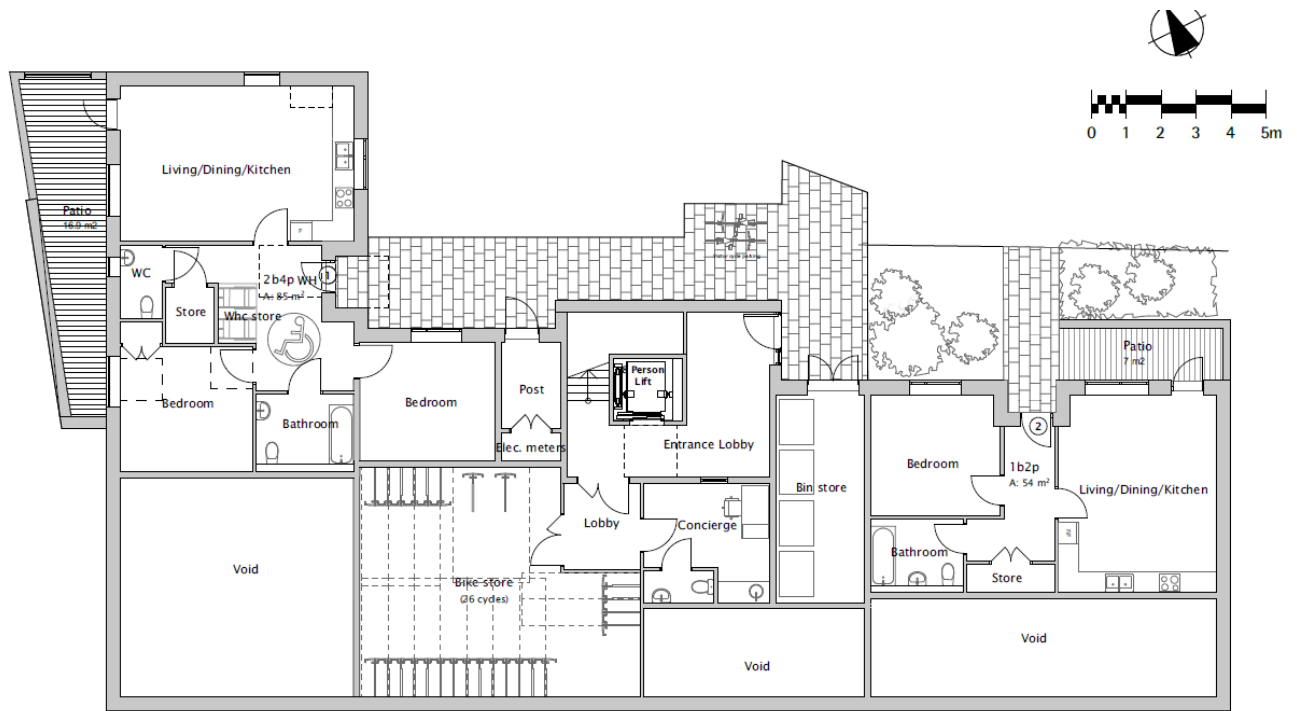
Block 3 - East Elevation

Block 3 - Eastern Elevation



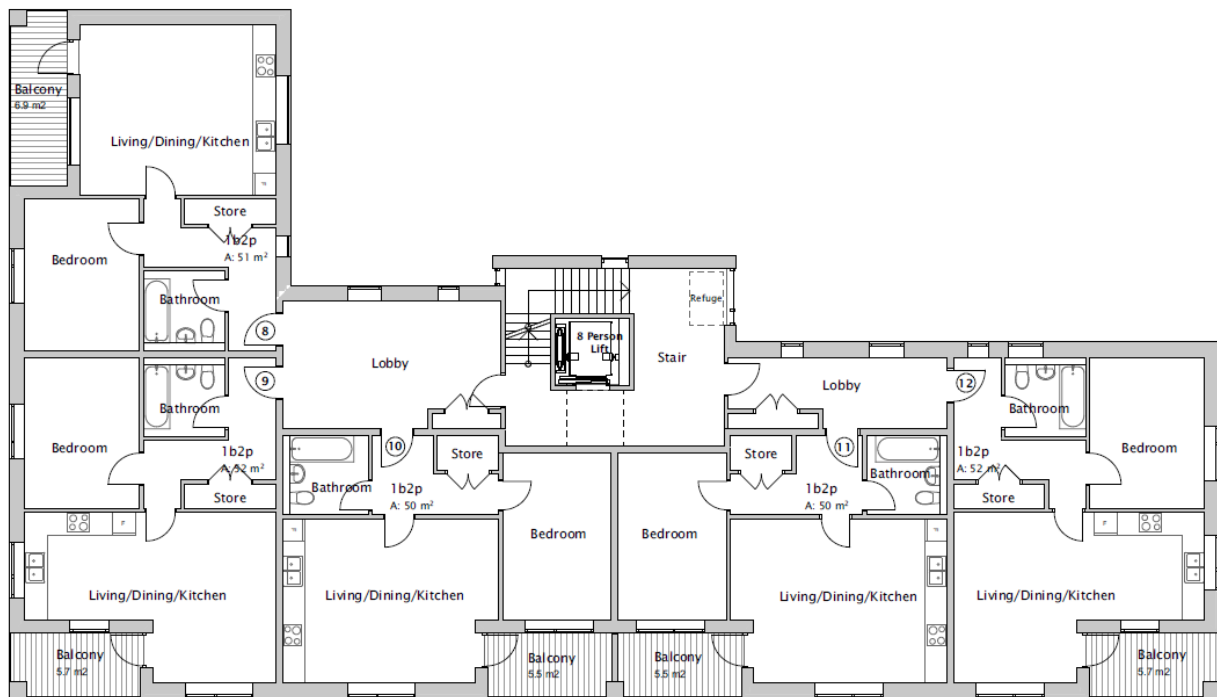
Block 3 - Southern Elevation (facing railway)

Proposed floor plans:



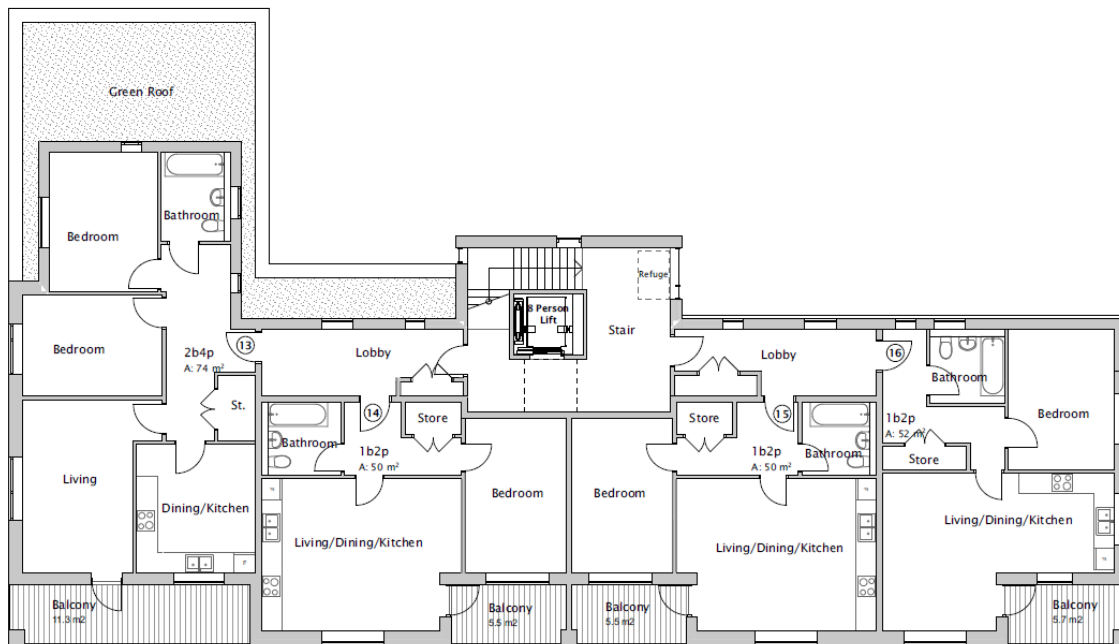
Ground Floor Plan

Block 1 - Ground floor plan



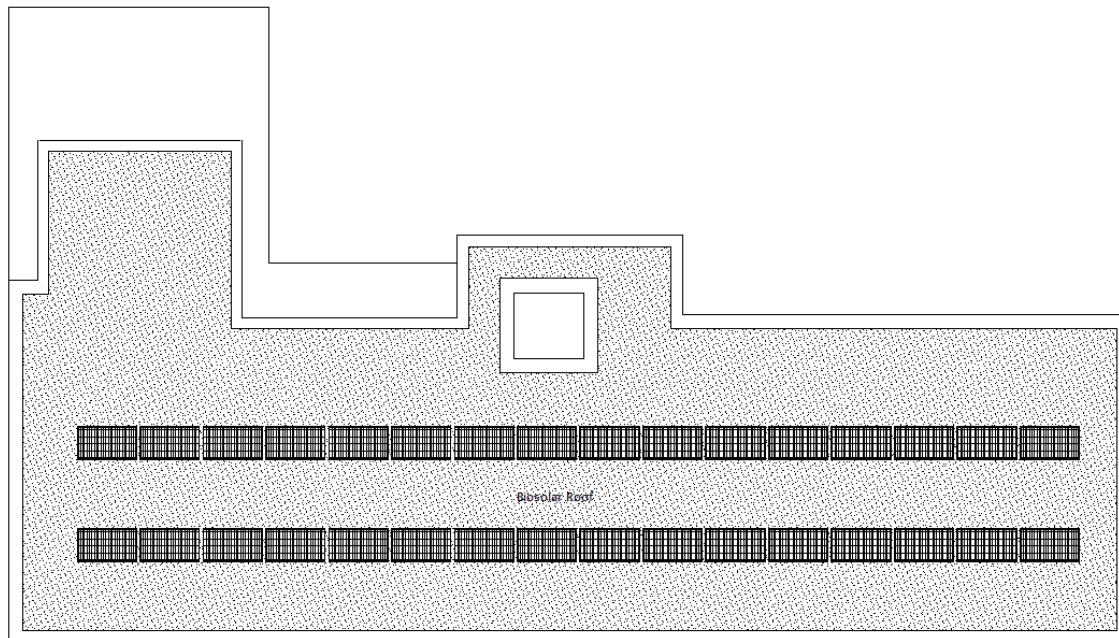
First and Second Floor Plans

Block 1 – First and Second floor plan



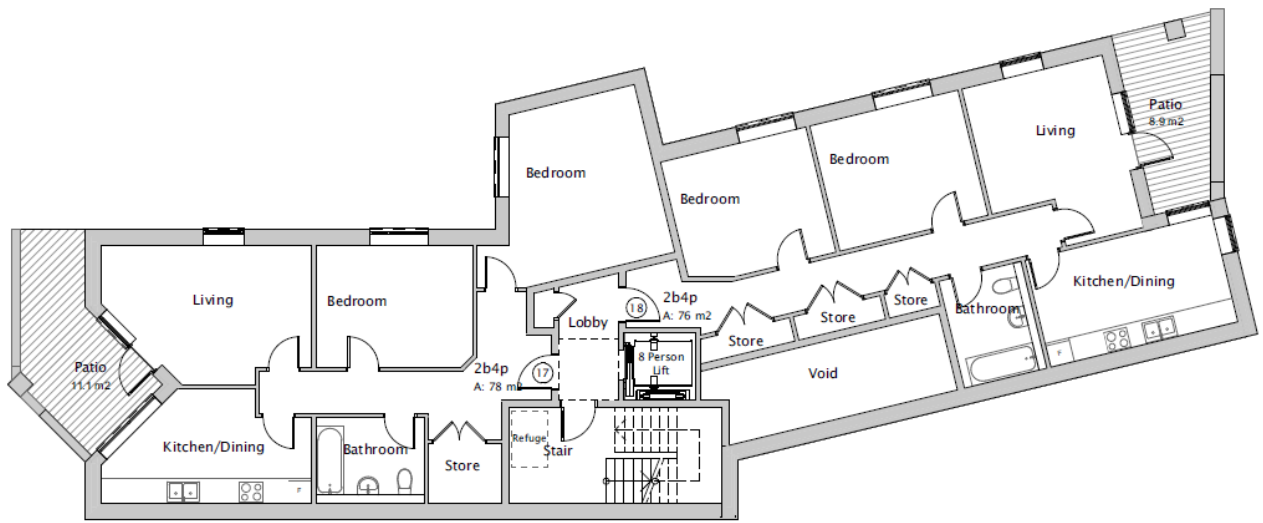
Third Floor Plan

Block 1 - Third floor plan



Roof Plan

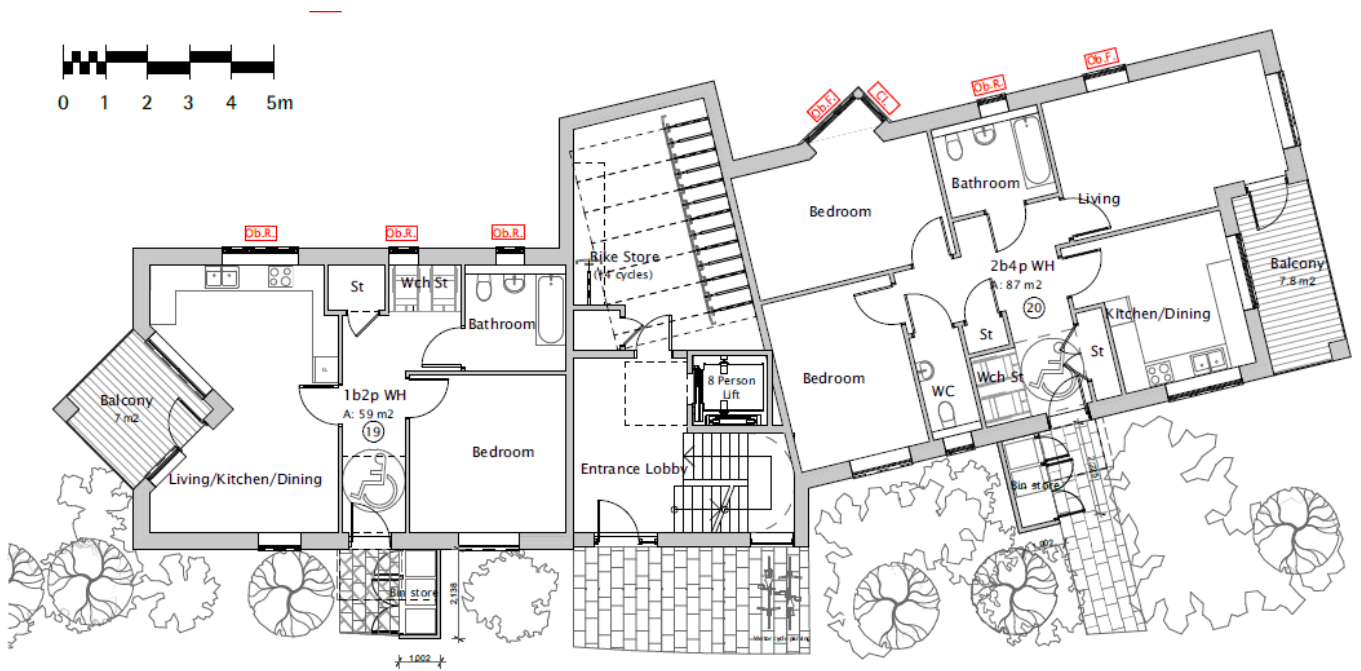
Block 1 - Roof plan



Lower Ground Floor Plan

1:100

Block 2 – Lower Ground Floor Plan



Ground Floor Plan

1:100

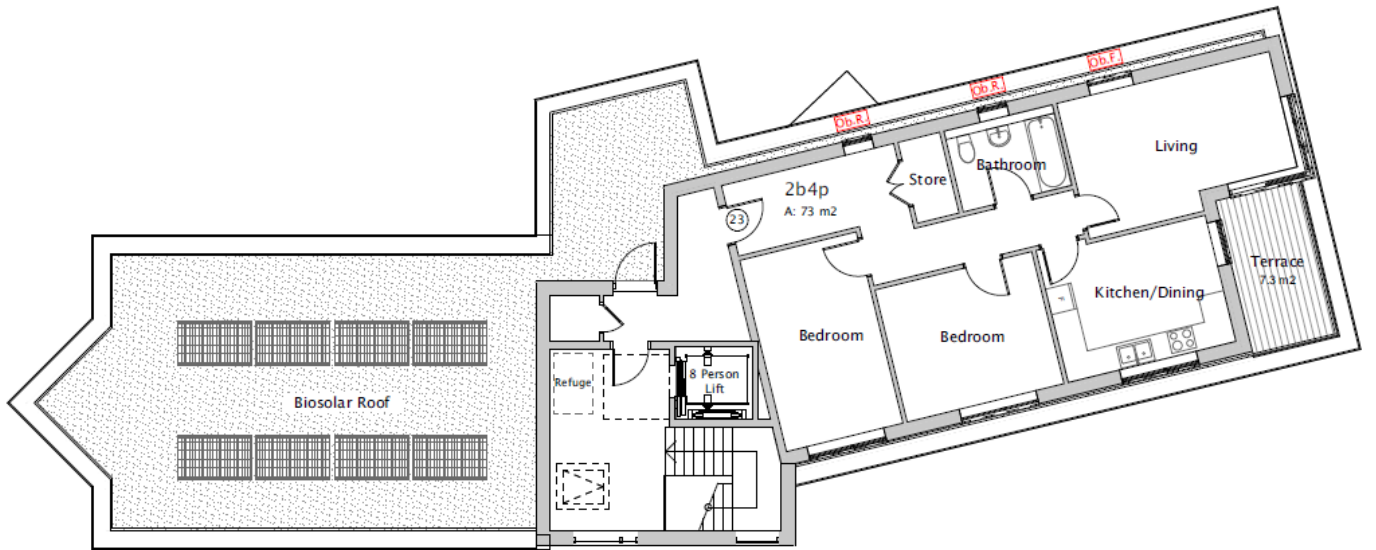
Block 2 – Ground Floor Plan



First Floor Plan

1

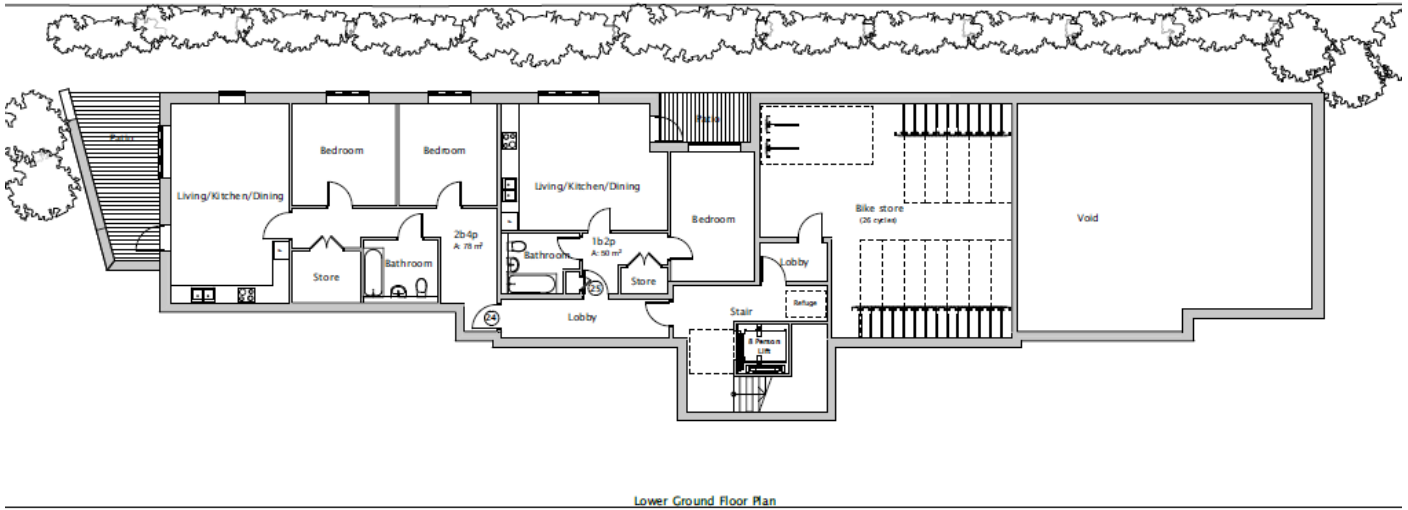
Block 2 – First Floor Plan



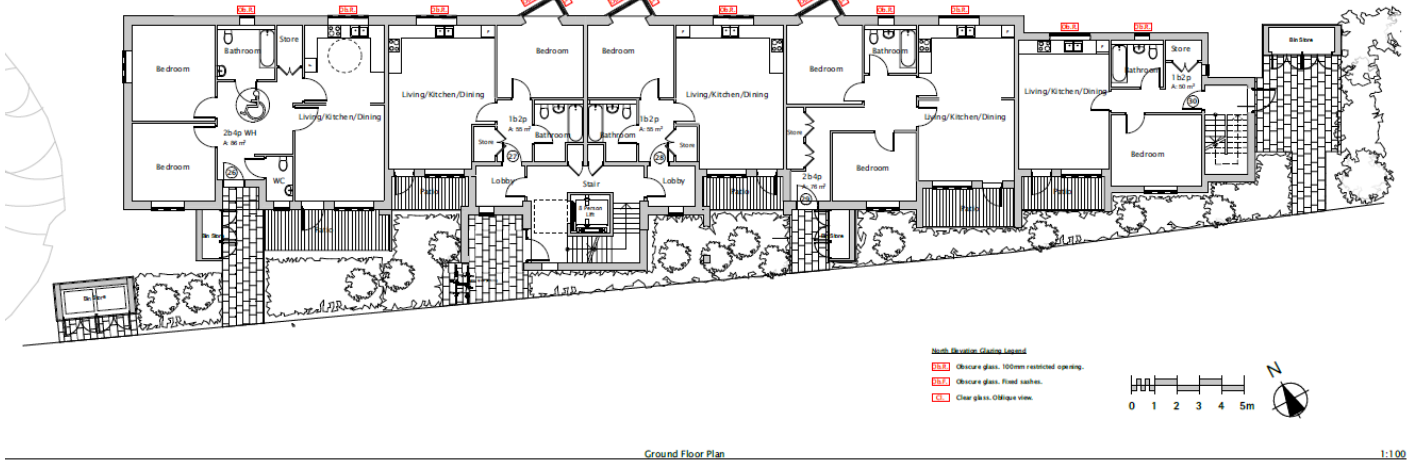
Second Floor Plan

1:

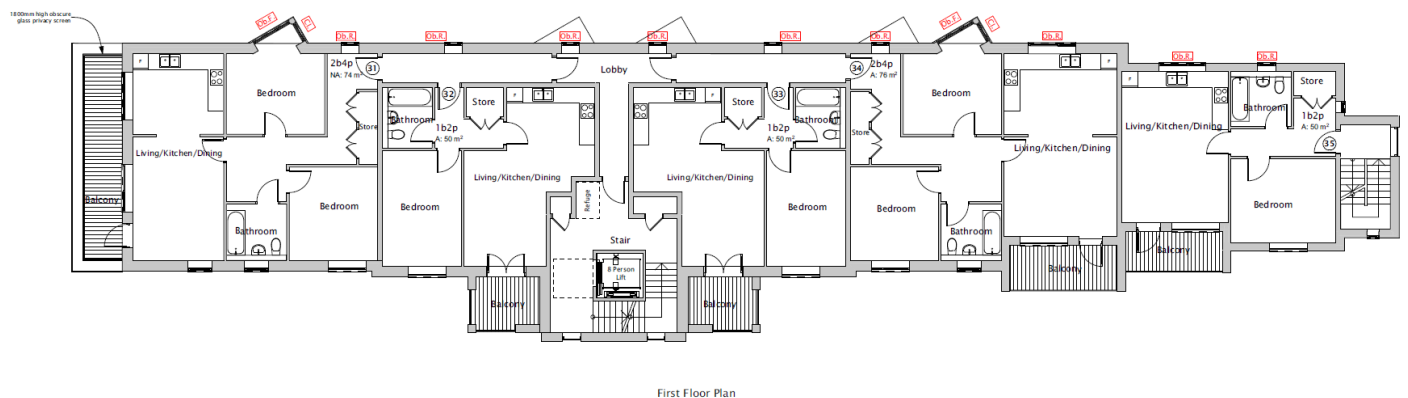
Block 2 – Second Floor Plan



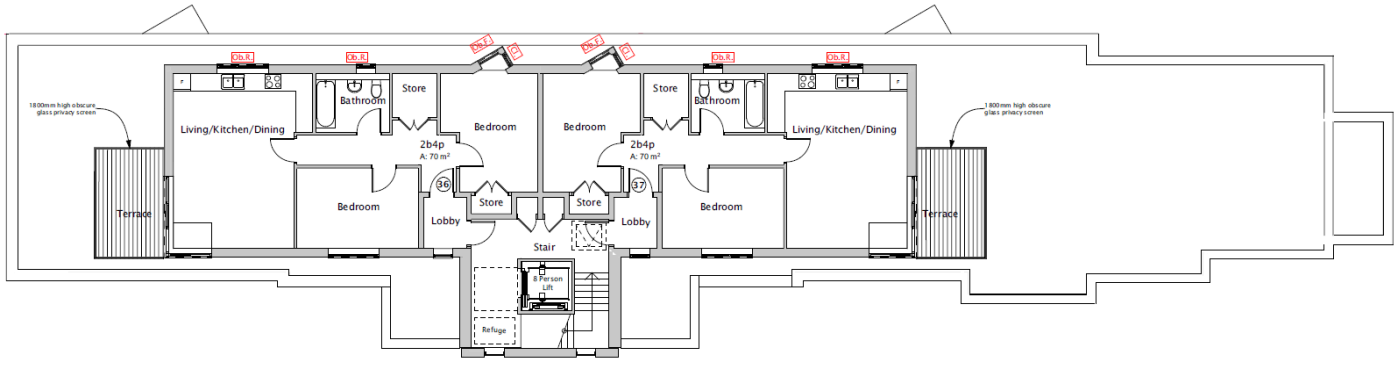
Block 3 – Lower Ground Floor Plan



Block 3 – Ground Floor Plan

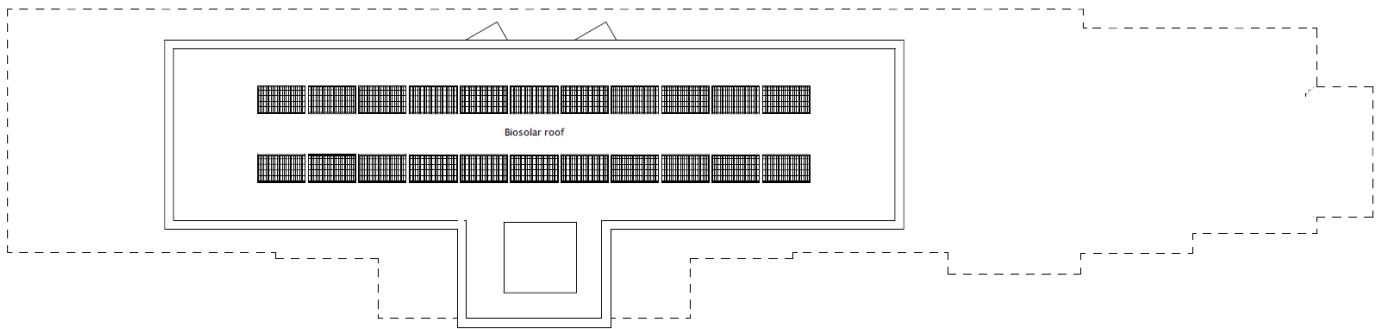


Block 3 – First Floor Plan



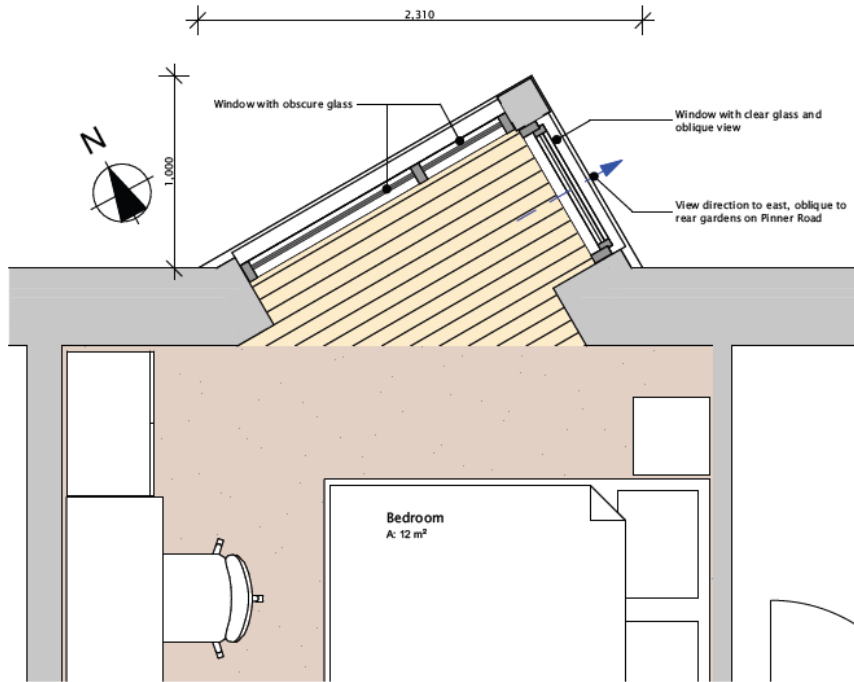
Second Floor Plan

Block 3 – Second Floor Plan



Roof Plan

Block 3 – Roof Plan



TYPICAL PLAN OF OBLIQUE WINDOWS
 (NB All oblique windows are to bedrooms - see layout plans)

Blocks 2 and 3 – Oblique window details



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