Planning Committee SPECIAL

PLANNING APPLICATIONS RECEIVED

DATE: **Tuesday 26 June 2012**

Harrow COUNCIL
LONDON

SPECIAL PLANNING COMMITTEE

APPLICATIONS

TUESDAY 19th JUNE 2012

PLANNING APPLICATIONS RECEIVED

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SPECIAL PLANNING COMMITTEE

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SECTION 1 – MAJOR APPLICATIONS

Item No.	1/01
Address:	THE KODAK SITE (COMPRISING KODAK FACTORY AND FORMER SPORTS GROUND (ZOOM LEISURE)), HEADSTONE DRIVE & HARROW VIEW
Reference:	P/3405/11
Description:	Outline planning application for a comprehensive, phased, mixed use development of land at Harrow View and Headstone Drive, as set out in the Development Specification (March 2012). The development comprises the demolition of existing buildings and structures (with the exception of the chimney and part of powerhouse) and redevelopment of the site for a mix of uses comprising business and employment uses (within Use Classes B1(a), B1(b), B1(c), B2 and B8 – up to 35,975sqm); residential dwellings (within Use Class C3 – up to 985 units); student accommodation (Sui Generis use – up to 220 units); senior living accommodation (within Use Class C2); assisted living care home (within Use Class C2) (total C2 uses up to 9,300sqm); retail and restaurant uses (within Use Classes A1, A2, A3, A4 and A5 – up to 5,000sqm); commercial leisure uses (Use Class D2); community uses (Use Class D1); health centre (Use Class D1); a primary school (Use Class D1) (total D1/D2 uses up to 8,830sqm); energy centre (Sui Generis use – up to 4,500sqm); together with new streets and other means of access and circulation; highway improvements; associated parking; re-profiling of site levels; utilities diversions and connections; open space; landscaping and ancillary development including infrastructure, works and facilities.
Ward:	Marlborough & Headstone North
Applicant:	LS Harrow Properties Ltd
Agent:	CBRE Planning
Case Officer:	Nicholas Ray
Expiry Date:	02/04/2012

RECOMMENDATION A

GRANT planning permission subject to:

- Conditions set out at the end of this report;
- Referral to the GLA under Stage 2 of The Town and Country Planning (Mayor of London) Order 2008;
- Referral to the National Planning Casework Unit (DCLG) under The Town and Country Planning (Consultation) (England) Direction 2009; and

- The completion of a Section 106 agreement with the heads of terms set out below (subject to further negotiation and agreement).

Authority to be given to the Divisional Director of Planning in consultation with the Director of Legal and Governance Services for the sealing of the Section 106 agreement and to agree any minor amendments to the conditions or the legal agreement.

Broad proposed heads of terms:

I. **Sport and open space:** A total of £2,395,000 contributions towards playing pitch and changing room facilities improvements at nearby Council sites, as well as a contribution towards the development of Harrow Leisure Centre and the provision of a MUGA within the proposed primary school;
II. **Education:** A total of £1,180,000 contributions towards the provision of land for the primary school and an off-site contribution towards secondary education;
III. **Transport and travel:** A total of £2,952,000 contributions towards highways/junction improvements, car parking restrictions, improved pedestrian and cycle facilities, improved public transport facilities and the provision of a green travel plan;
IV. **Employment and training:** A total of £2,100,000 contributions, including the provision of a subsidised business incubator centre, contributions towards inward investment, local employment, town centre management and construction training.
V. **Affordable housing:** The provision of 20% of the proposed housing as affordable (in accordance with the Council's preferred mix), with a mechanism to re-appraise site viability and the availability of grant throughout the course of the development; and
VI. **Community, heritage and leisure:** A total of £1,490,000 contributions, including the provision of land for a community centre, the provision of public art throughout the scheme and contributions towards Headstone Manor.

EXECUTIVE SUMMARY

This is an outline planning application for the comprehensive redevelopment of some 25.4 hectares of land in Wealdstone comprising the existing Kodak manufacturing facility (including cleared land) and its associated private sports ground.

The re-development proposals (representing over £300m investment) involve the creation of up to 35,975sqm of new employment floor space (providing up to 2,000 new jobs) through a process of economic cross subsidy from the positive development values created by up to 985 new homes and some 5,000sqm of new retail floor space. In addition, the development provides for new education, health and community facilities on site, and creates a continuous publically accessible green linkage through the site to replace the private open space lost on the former Zoom Leisure sports facility. In addition, through the S.106 agreement and associated conditions, the development provides financial and contributions in kind that equate to £10 million of infrastructure to be provided on and off site, alongside almost 200 affordable dwellings.

The application itself comprises a Development Specification, Design Guidelines and Parameter Plans, which are accompanied by illustrative drawings and technical documents (including transport and environmental information) which form the application documentation.

The proposals have been developed through pre application consultation with the Council, members and the community over a 2 year period. The design and layout of the site have been revised through the pre application process and were further refined following

submission in December last year, with revised drawings in March and May 2012.

Over 16,000 consultation letters have been sent out by the planning authority – eliciting some 50 responses alongside the formal responses from a number of statutory undertakers and partner agencies. The proposals have been reported to each of the meetings of the Councils Major Development Panel as they have evolved.

The application site anchors the north western end of the Harrow and Wealdstone area of Intensification (now referred to as the Heart of Harrow) which forms the cornerstone of a long term spatial vision adopted by the Council through its Core Strategy (February 2012). The Heart of Harrow project is also reflected in the Mayors Spatial Development Strategy (London Plan 2011) as providing at least 2800 new homes and 3000 new jobs to help meet London's long term economic needs. The Application site is identified as a key strategic site in the emerging master plan for the Heart of Harrow, being developed jointly with the Mayor's office. The site is the largest privately owned redevelopment opportunity in the borough.

The Harrow View East part of the site (comprising Kodak's remaining manufacturing operations and cleared land) is safeguarded in planning polices as a Strategic Industrial Location. The Harrow View West part of the site (comprising the former Zoom leisure facility and car parking areas) meanwhile is largely designated as open space (which includes sports pitches). The Heart of Harrow Area Action Plan (under development) and Harrow's adopted Core Strategy 2012 nevertheless provide for an appropriate, mixed use development on the site provided that it enables new employment (and jobs) on the site and results in a development that successfully links to and complements the wider regeneration and growth objectives for Wealdstone.

The comprehensive appraisal below, including consideration of the Environmental Information submitted with the application, concludes that on balance, and subject to appropriate controls and contributions towards new infrastructure that will acceptably mitigate the impact arising, the proposal should be supported. Because of its content and scale, the application will need to be considered by the Mayor of London and by the Secretary of State. A S.106 planning legal agreement will also be required to be completed prior to a formal decision being issued.

RECOMMENDATION B

That if the Section 106 Agreement is not completed by 26th December 2012 then it is recommended to delegate the decision to **REFUSE** planning permission to the Divisional Director of Planning on the grounds that:

The proposed development, in the absence of a Legal Agreement to provide affordable housing to meet the Council's housing needs, and appropriate provision for infrastructure 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 and physical infrastructural improvements arising directly from the development, contrary to the NPPF (2012), policies 2.17 3.11, 3.13, 3.18, 3.19, 6.3 and 7.18 of The London Plan (2011), Core Strategy (2012) policies CS1 and CS2, and saved policies T6, R4, C2 and C7 of the Harrow Unitary Development Plan (2004).

INFORMATION

This application is reported to the Committee as the number of residential units and floorspace proposed falls outside of the thresholds (six units and 400 sq m respectively) set

by category 1(d) of the Council's Scheme of Delegation for the determination of new development.

Statutory Return Type: Largescale Major Development

Council Interest: Part of the site comprises highways land at Headstone Drive and Harrow View.

Gross Floorspace: 91,479sqm

Net additional Floorspace: 45,313sqm

GLA Community Infrastructure Levy (CIL) Contribution (provisional): £1,585,955

Site Description

Strategic and Borough Level Policy Context

- The application site is located centrally in the Borough, has a total area of 25.4 hectares and comprises the Kodak industrial site (inclusive of operational and vacant areas), the former Zoom Leisure sports facility with associated car parking and adjacent highway land on Harrow View and Headstone Drive.
- The Kodak industrial site is designated as a Strategic Industrial Location in the London Plan and comprises vacant/cleared site areas, as well as operational buildings of up to 57 metres in height and associated plant.
- The former Zoom Leisure site comprises indoor and outdoor sports facilities and the playing fields on the site are designated as open space in the UDP, having an area of 4.3 hectares.
- The site lies within the wider Harrow and Wealdstone Area of Intensification, as defined in the London Plan and in terms of area is the largest strategic site in this designation.
- Intensification Areas are defined in the London Plan as built-up areas with good existing or potential public transport accessibility, which can support redevelopment at higher densities. They have significant capacity for new jobs and homes but at a level below that which can be achieved in designated Opportunity Areas.
- The Harrow and Wealdstone Area Action Plan, a Development Plan Document within the Local Development Framework, has reached the Preferred Options stage and sets targets for the delivery of 2,500 additional homes and 3,000 additional jobs in the Intensification Area.
- Within this target, the Kodak site is expected to deliver 1,230 jobs and 1,035 homes from the comprehensive redevelopment of the site.

Description of Application Site

The application site comprises two distinct parts, the Kodak industrial site (Harrow View East) and the former Kodak sports ground (Harrow View West), now closed and formerly known as Zoom Leisure, as well as highway land on Harrow View and Headstone Drive.

Harrow View East

- This part of the site comprises a total area of 15.9 hectares (10.5 hectares still in operational use by Kodak and 5.4 hectares of cleared land).
- The operational land is occupied by a range of industrial, logistical and administrative office buildings. There is also a variety of associated plant and machinery on the site, including the main powerhouse chimney, which is the tallest structure on the site.
- On the eastern edge of the site, adjacent to the railway line and to the north of the

Waverley Industrial estate, is the underground bunker element of a former Air Ministry citadel building, which has been recommended for local listing by the Council.

- The site slopes up from south to north, with maximum levels difference of approximately 6.2 metres. There is a drop in levels from the site down to Harrow View of between 1 and 1.5 metres.
- The site benefits from two existing vehicle accesses, one from Harrow View and the principle access from Headstone Drive, adjacent to Kodak's existing Reception Building.
- The site contains a number of protected trees, including a row of Limes adjacent to the western boundary of the site with Harrow View.
- Extant planning permission exists for the formation of a roundabout, alterations to junctions and highways improvements adjacent to the access from Harrow View (ref P/0813/11). These works are currently underway.

Harrow View West

- The part of the site comprises the former Zoom Leisure Centre, which closed in September 2011, as well as car parking associated with this use and Kodak operations.
- Harrow View West is 7.9 hectares in area and comprises privately owned playing fields, tennis courts, bowls greens and indoor sports and leisure facilities, with associated hard surfaced parking areas.
- The site slopes up from south to north, with maximum levels difference of approximately 8.9 metres.
- The site benefits from two existing vehicle accesses from Harrow View. A further pedestrian access (via a locked gate) exists between the site and Headstone Recreation Ground.
- The site contains a number of protected trees, including a row of Lombardy Poplars adjacent to the western boundary of the site.
- The western part of the site is a designated flood plain (Flood Zones 2-3b), whilst the remainder of the site is in Flood Zone 1.

Local Highway and Transport Network

- The two parts of the site are separated by Harrow View (A4008), which carries traffic from the north towards Harrow Town Centre.
- The southern boundary of the Harrow View East site abuts Headstone Drive (A4090), which carries traffic between North Harrow and Wealdstone.
- Approximately 400 metres to the east of the site is Station Road (A409), which runs north-south and forms the central 'spine' road within the Borough and the Area of Intensification.
- The H14 bus runs north-south along Harrow View, between Hatch End and Harrow Town Centre, and then on to Northwick Park Hospital.
- The H9 and H10 buses run east-west along Headstone Drive in circular routes, the H9 linking up Harrow Town Centre with Northwick Park Hospital and Kenton, whilst the H10 links up Harrow Town Centre with South Harrow and Rayners Lane.
- Harrow and Wealdstone Station is located approximately 400 metres to the south east of the site and is served by London Underground, London Overground and National Rail services, as well as additional bus services running along Station Road.
- Headstone Lane station is located approximately 600 metres to the north west and is served by London Overground services.

Description of Immediate Locality

- To the east of the application site are industrial and business developments within the Waverley Industrial Estate, the West Coast mainline railway and the Crown Court, with Wealdstone District Centre and residential areas beyond.

- To the south are suburban residential areas, comprising predominantly two storey semi-detached and terraced housing along with taller flatted developments, with Harrow Metropolitan Centre some 1.4km away.
- To the west are suburban residential areas comprising predominantly single and two storey semi-detached and terraced housing, as well as taller flatted developments fronting Harrow View.
- To the west of the Harrow View West site is Headstone Manor Recreation Ground, which is designated Metropolitan Open Land in the UDP and is occupied by Headstone Manor, a Grade I listed moated building with Grade II listed outbuildings. The Manor is used as a heritage and cultural centre. The Manor complex is also a designated Scheduled Ancient Monument.
- To the north of the site is suburban residential development on Pinner Park Gardens, Pinner Park Avenue and Holmwood Close, comprising predominantly two storey semi-detached housing.

Proposal Details

Form of Application

This application is submitted in outline with all matters reserved and proposes a comprehensive, phased, mixed use development of the site. The outline planning application (OPA) seeks approval for:

Use – the types of use or uses proposed for the development and any distinct development zones within the site identified;

Amount – the amount of development proposed for each use, in the form of floorspace or number of residential units;

Layout – an indicative layout showing the approximate location of buildings, routes and open spaces in the proposed development;

Scale – the upper and lower limit for the heights of buildings, building set backs and number of storeys; and

Access – the locations where access points to the development would be situated, along with primary and secondary routes within the development.

As such, details of the layout, scale, access, appearance and landscaping of the development, other than those outlined above and set by the **Parameter Plans**, **Development Specification** and **Design Guidelines**, are not under consideration at this stage and would be considered under future reserved matters applications. The above documents would provide a framework for these subsequent details to be prepared.

Buildings to be Demolished

The proposed development would entail the demolition of the majority of the existing buildings on the Harrow View West and Harrow View East sites, with the exception of the Kodak reception building (to be retained and refurbished), the chimney and part of the powerhouse (to be retained as a landmark feature) and the former Air Ministry bunker.

Overall Amount of Development Proposed

The table below sets out the development floorspace applied for under each use class, which would be the maximum amount that could be provided across the development under the OPA:

Use Class	Total Amount	Types of Use
Business and employment (B1/B2/B8)	35,975sqm	Offices, light industrial, logistics, business incubation and start-up space
Residential institutions (C2)	9,300sqm	5,500sqm care home, 4,730sqm

		senior living accommodation
Retail (A1/A2/A3/A4/A5)	5,000sqm	4,000sqm foodstore, 1,000sqm A1-A5 units
Non-residential institutions and assembly and leisure (D1/D2)	8,850sqm	1,155sqm leisure facility, 2,816sqm health centre, 1,562sqm community centre, 550sqm community centre/café, 3,630sqm primary school
Energy centre	4,500sqm	Energy centre
Residential (C3)	985 units	Houses and flats
Student housing (Sui Generis)	220 units	Student halls

The Parameter Plans also seek a minimum of 5.12 hectares of permanent public open space within the development, in the form of a green link and a new park adjacent to Headstone Manor Recreation Ground, along with smaller areas of open space within the Development Zones in the form of play areas and amenity greenspace.

Phasing

The development would come forward on a phased basis, which is expected to take up to 10 years. There would be 3 phases of development (set out on the plan below), although phase 1 would be split into 3 to account for site ownership:

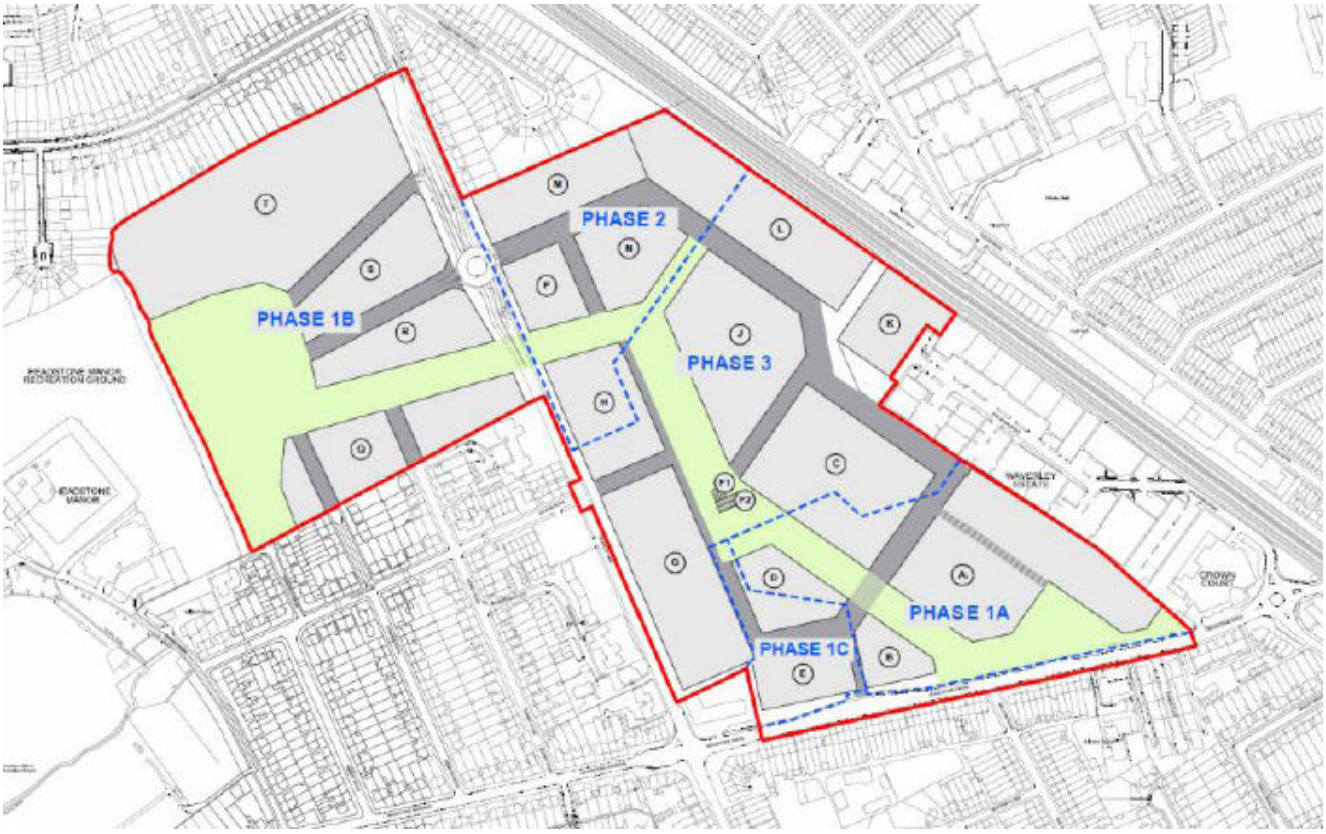
Phase 1A: This would be built out on the southern cleared part of the Harrow View East site, adjacent to Headstone Drive and the Waverley Industrial Estate.

Phase 1B: This would comprise the whole of the Harrow View West site.

Phase 1C: This would be adjacent to phase 1A and currently comprises the Kodak Reception Building and parking areas.

Phase 2: This is the northern part of the Harrow View East site, which currently comprises some of Kodak's existing operations and some cleared land.

Phase 3: This is the area in the centre of the Harrow View East site, which currently houses Kodak operations.



Development Zones

The submitted Parameter Plans set out the development zones that comprise the masterplan for the site, labelled A-T, and these are also dealt with under the Development Specification and Design Guidelines. It is intended that reserved matters applications would be submitted in accordance with the phasing discussed above and on a zone by zone basis (although each reserved matters application could cover more than one zone or part of a zone) and therefore each development zone has maximum floorspace limits for each type of use. Although the school would be located in phase 2, the land in this area is cleared and it is intended that this be brought forward at phase 1, along with additional open space. The details of each development zone are set out below.

Zone A

- 1.72 hectares in area, would comprise up to 1,155sqm of leisure use (D2), 4,400sqm of retail (A1-A5), 1,562sqm of community use (D1/D2), 2,816sqm health centre (D1), 220 units of student housing (Sui Generis) and 74 residential units (flats) (C3).
- The buildings would be up to 23.5 metres in height and between 3-6 storeys.

Zone B

- 0.26 hectares in area, would comprise up to 3,932sqm of employment use (B1) and 400sqm of retail (A1-A5).
- The buildings would be up to 15.5 metres in height and between 4-6 storeys.

Zone C

- 1.35 hectares in area, would comprise up to 1,430sqm of employment use (B1) and up to 129 residential units (flats and houses) (C3).
- The buildings would be up to 18.5 metres in height and between 4-5 storeys.

Zone D

- 0.44 hectares in area, would comprise up to 5,500sqm of care home use (C2) and 66 residential units (flats and houses) (C3).
- The buildings would be up to 14.5 metres in height and between 4-6 storeys.

Zone E

- 0.35 hectares in area, would comprise up 8,426sqm of employment use (B1/B8) including the refurbished Kodak reception building.
- The buildings would be up to 16 metres in height and up to 4 storeys.

Zone F1

- Comprises the existing chimney to be retained, which has a height of 59.5 metres.

Zone F2

- Comprises the retained part of the powerhouse.
- This is proposed to be retained for use as a 550sqm café/community use (D1/D2).

Zone G

- 1.2 hectares in area, would comprise up to 153 residential units (flats and houses) (C3).
- The buildings would be up to 17 metres in height and between 3-5 storeys.

Zone H

- 0.7 hectares in area, would comprise up to 4,730sqm of senior living space (C2) and 106 residential units (flats and houses) (C3).
- The buildings would be up to 21.5 metres in height and between 4-5 storeys.

Zone J

- 1.22 hectares in area, would comprise up to 1,860sqm of employment use (B1) and 134 residential units (flats and houses (C3).
- The buildings would be up to 21 metres in height and up to 6 storeys.

Zone K

- 0.46 hectares in area, would comprise an energy centre of up to 4,950sqm (Sui Generis) and 400 space multi-storey car park.
- This would be constructed above the former military bunker.
- The buildings would be up to 31 metres in height and up to 6 storeys.

Zone L

- 1.27 hectares in area, would comprise up to 16,225sqm of employment use (B1/B2).
- The buildings would be up to 20 metres in height and up to 3 storeys.

Zone M

- 0.69 hectares in area, would comprise up to 7,700sqm of employment use (B1).
- The buildings would be up to 14.5 metres in height and up to 3 storeys.

Zone N

- 0.53 hectares in area, would comprise up to 200sqm of retail use (A1-A5) and 109 residential units (flats and houses) (C3).
- The buildings would be up to 14.5 metres in height and up to 4 storeys.

Zone P

- 0.36 hectares in area, would comprise a three form entry primary school of up to 3,630sqm (D1), including a multi use games area (MUGA).
- The buildings would be up to 18 metres in height and up to 3 storeys.

Zone Q

- 1.14 hectares in area, would comprise up to 59 residential units (flats and houses) (C3).
- The buildings would be up to 17 metres in height and up to 3 storeys.

Zone R

- 0.66 hectares in area, would comprise up to 65 residential units (flats and houses) (C3).
- The buildings would be up to 15.5 metres in height and between 3-4 storeys.

Zone S

- 0.73 hectares in area, would comprise up 62 residential units (flats and houses) (C3).
- The buildings would be up to 17.5 metres in height and between 3-4 storeys.

Zone T

- 2.62 hectares in area, would comprise up to 128 residential units (flats and houses) (C3).
- The buildings would be up to 22 metres in height and up to 3 storeys.

Access and Routes

- The application proposes to utilise the existing access points to the two parts of the site to provide access to the main Primary Route, including from the approved roundabout on Harrow View (currently under construction).
- The Parameter Plans set a number of secondary routes that provide access to the development zones within the scheme.

Revisions to Application Following Original Consultation:

23rd March 2012:

- Inclusion of B2 (general industrial) uses within Zone L.
- Reduction in retail floorspace of the smaller units by 1,000sqm across the site. It is now proposed to provide 800sqm in Zones A and B (instead of 2,000sqm as previously proposed), and the remaining 200sqm to be provided in Zone N.
- Removal of some secondary routes and addition of others in the Parameter Plans, with additional deviation added to some routes.
- Addition of a pedestrian and cycle route through Zone A.
- Removal of 3 metre deviation along the extent of the Green Link.
- Increase in width of the Green Link along some sections.
- Amended tree plan and report submitted showing additional trees to be retained.
- Increase in the stack height of the energy centre in response to air quality concerns.

14th May 2012:

- Width of Green Link on Harrow View West area and between development zones H and P increased to a minimum of 35 metres. Parameter Plans and Design Guidelines amended accordingly.

Relevant History

P/1795/09 – Change of use of vacant site for temporary open air market with 100 stalls including ancillary food sales and parking for 200 cars
Granted – 17/12/2009

P/2117/10 – Variation of condition 5 attached to planning permission P/1795/09 dated 17/12/2009 to be changed from market on Fridays to market on Tuesdays
Granted – 14/12/2010

P/0813/11 - Extension of time to planning permission P/1685/08CFU dated 20/06/2008 for 'highway works including 1) formation of roundabout 2) alterations to junctions to sports ground 3) temporary access to leisure facility 4) temporary contractors' compound 5) erection of brick piers and railings'
Granted – 21/06/2011

P/1294/11 - Non-material amendments to conditions 2 and 5 attached to planning permission P/1685/08CFU dated 20/06/08 for `highway works including 1) formation of roundabout 2) alterations to junctions to sports ground 3) temporary access to leisure facility 4) temporary contractors compound 5) erection of brick piers and railings
Granted – 16/06/2011

Pre-Application Discussion

Following an extensive period of engagement with Council officers, Land Securities as the parent company to the applicant, entered into a formal Memorandum of Understanding

(MoU) with the Council on 23rd July 2010 specifically in connection with the application site. This MoU sets a vision for the future of the site and facilitates cooperation between the parties to bring forward through the planning application process. Pursuant to the MoU, Land Securities entered into a Planning Performance Agreement (PPA) in June 2011 with the Council and Transport for London (TfL) to formalise the pre-application stage of engagement in respect of the proposals. Comprehensive pre-application discussions have taken place with Council officers, TfL, the Greater London Authority (GLA) and other statutory consultees under the terms of the PPA.

Community and Stakeholder Engagement
The Council's Statement of Community Involvement (2006) states that 'ideally the results of pre-application consultation should be included in the planning application and form part of the planning application process'. A Statement of Community Involvement accompanies the application and this document explains the programme of public consultation and community engagement carried out prior to the submission of the application. As part of its programme of community engagement, the applicant has initiated a number of public consultation exercises including extensive flyer distribution, press releases, various exhibitions and workshops as well as appointing an independent consultant focusing on place making, identifying the strengths and weaknesses of an area, its unique features and the exploitation of an area's positive features. In addition, the applicant has attended every Major Development panel (MDP) since September 2010, regularly briefing the Panel on progress over the past year as well as making contributions to the Council's Core Strategy and Harrow and Wealdstone AAP workshops and engagement activities.

Applicant Submission Documents
Formal OPA Documents
These documents set the development limitations and parameters for future reserved matters applications and reflect the position following amendments made to the application in March and May 2012, in response to consultee and stakeholder comments.

Site Location Plan – The red line plan that denotes the site boundary.

Parameter Plans
- Principal Public Realm Areas – HV(00)AP101 (14.05.2012)
- Development Zones – HV(00)AP102 (14.05.2012)
- Zoning & Land Uses – HV(00)AP103 (14.05.2012)
- Local Play Areas – HV(00)AP104 (14.05.2012)
- Maximum Building Heights and Proposed Finished Site Levels – HV(00)AP105 (14.05.2012)
- Maximum Development Zone Envelopes – HV(00)AP106 (14.05.2012)
- Maximum Building Envelope Schedule – HV(00)AP106A

Application Plans
- Planning Application Area – HV(00)AP001
- Existing Site Layout – HV(00)AP002
- Existing Site Levels and Trees – HV(00)AP003 (20.03.2012)
- Buildings Demolition & Retention – HV(00)AP004

Design Guidelines (May 2012) – Sets out detailed design guidance for future phases on matters such as massing and scale, frontage, access, orientation, amenity, architectural character and materials.

Development Specification (March 2012) – Sets out the total quantum of each land use and the quantum on a zone by zone basis. This document also fixes certain other characteristics of the development, including internal routes, frontages and which phase each zone falls into.

Supporting Documentation

Indicative Plans

- Illustrative Land Use – HV(00)AP301 (06.06.2012)
- Illustrative Residential Unit Layout – HV(00)AP302 (06.06.2012)
- Illustrative Landscaping Plan – HV(00)AP303 (06.06.2012)

Planning Statement & Application Addendum (March 2012) – Explains the form and content of the scheme and application, sets out relevant planning policy and appraises the proposal, whilst cross-referencing other supporting documents.

Design and Access Statement – Provides a narrative as to the vision, objectives, design principles and key design elements of the scheme, including masterplanning and site layout, open space, character areas and landscaping.

Employment Report – Reviews the current economic situation in Harrow, before explaining how this might develop in the future, as well as the role that the proposal can play in that process. The report deals with the strategy for delivering consolidated employment space on the site.

Retail Statement & Supplementary Retail Statement (March 2012) – Provides an assessment of the retail elements of the proposals, in relation to the principle of these uses and their likely impact on nearby shopping centres.

Sports Facilities and Open Space Needs Analysis – Provides a summary of the sports facilities to be lost as part of the proposals, an overview of the need for such facilities in the Borough, as well as proposed mitigation measures.

Flood Risk Assessment – Provides an assessment of potential sources of flooding and the associated flood risks to both the application site and neighbouring areas.

Affordable Housing and Viability Statement – Provides information relating to overall scheme viability and the provision of affordable housing.

Energy Statement – Sets out the strategy for energy generation and energy saving measures to be incorporated into the development.

Daylight and Sunlight Report – Provides an initial assessment of the impact the proposed development would have on daylight and sunlight to neighbouring properties and within the development itself.

Transport Assessment, Transport Assessment Addendum (March 2012) & Car Parking Management Plan (March 2012) – Provides an assessment of local highway conditions and deals with the likely impact of the proposed development, recommending mitigation measures in terms of highway improvements, recommended parking standards and measures to encourage sustainable transport modes.

Heritage Statement – Outlines the likely impact on the heritage assets on, and within the vicinity of, the application site.

Arboricultural Report (March 2012) – Sets out the impact the proposed development would have on trees, as well as any appropriate mitigation measures.

Remediation Strategy – Provides an assessment of land contamination on the site and sets out a strategy for remediation during the course of the development.

Sustainability Statement – Appraises the current policy position in relation to energy, water, resource conservation, waste management, biodiversity and pollution control, as well as reviewing project specific targets to address these policies.

Statement of Community Involvement – Describes the schedule and outcomes of the community pre-application consultation that has taken place.

Environmental Impact Assessment (EIA)
The development falls within the thresholds set out in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (the EIA Regs), whereby an EIA is required for the purposes of assessing the likely significant environmental effects of the development. A Scoping Opinion was issued by the Council on the 13th July 2011, commenting on the approach and methodology for assessing the impact of the following environmental topics:

- Transport;
- Air quality;
- Noise and vibration;
- Ground conditions;
- Water;
- Ecology;
- Landscape, townscape and visual amenity;
- Socio-economic;
- Archaeology and cultural heritage;
- Waste management; and
- Climate change and renewable energy.

An Environmental Statement (ES) has been submitted as a supporting document to the application, which includes environmental information under the above topics. Further information was also submitted in the form of an Environmental Statement Addendum to address the changes made to the scheme during the course of the application. Officers are satisfied that this represents the environmental information for the purposes of Regulation 3 of the EIA Regs and detailed consideration of this information is undertaken in the below appraisal sections.

Consultations

Greater London Authority Stage 1 Response: Development does not fully comply with the London Plan. The following strategic policy areas raise concerns:

- Employment: The proposed mixed use redevelopment of strategic industrial land raises an objection in principle and issues are raised with respect to fragmentation and potential conflicts of use.
- Open land: Clarifications, potential revisions and commitments are sought with respect to reconfiguration of open space, sports pitches and other sports facilities.
- Retail: An independent review of the submitted retail study is sought.
- Housing: A proposed housing schedule has not been provided.
- Student housing: Broadly supported, however, commitments are sought and informatives provided.
- Health and social care: Broadly supported, however, informatives provided to ensure

acceptable future detailed applications.

- Education facilities: Broadly supported.
- Urban design: Revisions and commitments sought with respect to green link, employment layout, access, movement and parking, masterplan blocks and design guidance.
- Inclusive access: Clarifications and commitments are sought with respect to dwellings and public realm.
- Sustainable development: Clarifications and commitments are sought with respect to renewable energy, urban greening, sustainable urban drainage, ambient noise and air quality.
- Transport: Clarifications and commitments are sought with respect to trip generation and highway impact, parking, buses, Harrow-on-the-Hill station and Harrow Bus Station, walking and cycling and travel planning.

If minded to approve, the application would need to be referred back to the Mayor under Stage 2.

External Consultees

Environment Agency: Conditions recommended in relation to surface water storage, land contamination and protection of watercourses.

English Heritage: The proposals would affect the setting of Headstone Manor and the Scheduled Ancient Monument, although the proposals are generally supported in this regard. The retention of the 1925 Power House and Station Z is strongly supported, as these are important remnants of the photographic and wartime history of the site. Historic road patterns should be opened up where possible. Welcome the identification of important views, although further work may be required at reserved matters stage. The level of detail submitted at this stage is acceptable, but further detail should be submitted with reserved matters applications to demonstrate that the proposed housing would not adversely affect the setting of Headstone Manor. S.106 monies should be secured to improve public access and carry out repairs.

English Heritage Archaeology: Conditions recommend requiring the implementation of a programme of archaeological mitigation and standing building recording.

Natural England: The proposal would not affect protected landscapes or soil conservation. The submitted bat survey is satisfactory, standing advice should be referred to in respect of other species. Proposed biodiversity enhancements should be secured by condition or legal agreement.

Sport England: Objection, on the basis that the application results in a significant loss of playing field and sports hall contrary to Sport England's Playing Field Policy. Further comment will be made once Harrow's Playing Pitch Strategy has been finalised.

Thames Water/Veolia: Thames Water have reviewed the drainage strategy and phasing plan for this site and have no concerns regarding this planning application as long as the phasing plan is adhered to. No comments from Veolia.

London Underground (Infrastructure): No objection.

NHS/Primary Care Trust: The PCT are interested in the provision of a health facility within the development, but are not in a position to confirm whether it needs to be the size of the building proposed. Query raised as to S.106 contributions towards healthcare provision.

Council for British Archaeology: The proposal to retain the chimney and powerhouse should be left to local opinion. Objection to development of housing close to Headstone Manor, which would affect its setting.

Design for London

Concerns raised in relation to the amount, width, usability, greenness and continuity of the proposed Green Link and open spaces. Concerns over street layout, permeability and pedestrian environment throughout the scheme. The employment area should link with the

Waverley Estate. The school should be sited to the west of Harrow View. Concerns that there would be inadequate open space within the development zones for the care home and senior living. Supermarket is not supported and raises design issues.

Neighbouring Boroughs
Three Rivers: Support the provision of employment space and housing. Concerns over trade diversion from centres in Three Drivers as a result of the retail space proposed.
Hertsmere: No response.
Hillingdon: No response.
Ealing: No response.
Brent: No objection, subject to significant contributions towards improving rail and bus services.
Barnet: No response.

Internal Consultees
Highway Authority: The outline application would be acceptable subject to s.106 contributions and conditions (set out in detail in appraisal section 7).
Landscape/Tree Officers: The revised application plan and Arboricultural Report, coupled with a condition relating to tree protection, would ensure that the majority of protected trees are retained and this would be acceptable. Details of landscaping and landscape management should be required at reserved matters stage, or by condition.
Conservation Officer: Based on the information available in the outline application, the proposals would have an acceptable impact on Headstone Manor and on views into and out of conservation areas. The retention of the Kodak power house and military citadel is supported. Detailed reserved matters applications will be further scrutinised in relation to the setting of Headstone Manor and s.106 contributions should be sought towards improvements to the Manor and public access to it.
Biodiversity Officer: If the mitigation measures recommended in the Biodiversity Report are followed I am satisfied that biodiversity interest of the site will be safeguarded and enhanced.
Education Officer: Support the provision of the primary school. Financial contribution should be sought towards secondary education provision.
Drainage Engineer: Conditions recommended in relation to surface water storage and attenuation, SUDS and sewage disposal.
Environmental Health: Contaminated land: The Environmental Statement concludes that the site is suitable for the mixed uses, subject to completion of site investigations and development and execution of a remedial strategy – conditions are recommended in this regard. Noise: Conditions recommended to require a demolition method statement, sound insulation to buildings and methods of avoiding light pollution. Air quality: The Environmental Statement is satisfactory in relation to air quality and no air quality standards objective would be exceeded as a result of the proposals. Best practice measures should be adopted during construction to ensure that dust emissions are mitigated.
Economic Development: Contributions should be sought towards marketing, inward investment and business support, town centre management, access to employment and construction skills and training.
Public Realm and Open Space: Contributions should be sought towards improvements to playing pitches and local parks.
Housing Officer: The maximum proportion of affordable housing should be sought, having regard to development viability. Priority should be for large (4/5 bed) social rented family housing. Provision should be made for a community self-build scheme.
Waste Management Officer: Details should be provided in relation to refuse storage and collection.
Sustainability Officer: The proposed Energy Strategy is acceptable. Queries raised in

relation to typical connection and energy costs.
Metropolitan Police Crime Prevention Design Officer: Condition recommended requiring a scheme of measures to minimise the risk and fear of crime.

Advertisement/Site Notice – First Consultation
Major Development / Setting of a Listed Building / Character of a Conservation Area / Departure from the Development Plan / EIA Development – Harrow Observer 29/12/2011, Expiry 31/01/2012

Notifications – First Consultation
Sent: 8,345
Replies: 33
Expiry: 31/01/2012

Addresses Consulted – First Consultation
An extensive consultation has been carried out, which covers a wide area surrounding the site, extending down to Marlborough Hill to the south, beyond Wealdstone Town Centre to the east, up to Long Elmes to the north and across to Headstone Lane in the west.

Summary of Responses – First Consultation
Of the 33 responses received following the first consultation, which includes residents associations and amenity groups, 1 supported the proposals, 7 supported the principle of the development but raised a number of concerns, 6 raised comment on some elements of the overall proposals but not to the principle for/against the development, whilst 19 objected outright. A summary of the concerns raised is set out below:

Residents Associations and Local Amenity Societies
Harrow Friends of the Earth: The proposed foodstore is too large and will impact on local shopping centres and traffic. The school is inappropriately located and too large, which would cause traffic problems. The transport and parking proposals fail to encourage use of sustainable transport modes. The Council should push for the highest proportion of affordable housing. Employment space supported. Sustainability measures supported. No objection transfer of green space from west to east. Welcome enhanced public access to Headstone Manor.
Harrow Agenda 21 Forum: Objection to extent of retail proposed and its impact on nearby shops and centres. Objection to loss of sports facilities and play/garden space. Concern over impact on local hospitals and increased traffic congestion. A new relief road should be built. What leisure facilities will be provided for the young? The proposed school will cause traffic problems and affect pedestrian safety. Concerns over general population growth and nearby developments.
Hatch End Association: Concerns over worsening traffic due to Headstone Drive/Harrow View junction. Concern over link between the east and west parts of the site – a bridge should be considered. The siting of the proposed school would be unacceptable and would cause traffic problems, in addition there is inadequate green space. There would be pressure on secondary schools. Regret loss of playing fields. Concerned about loss of poplars adjacent to Headstone Manor. Concerned about amount of employment space. Welcome the retention of the chimney and new route to Headstone Manor.
Campaign for a Better Harrow Environment: Concern over loss of playing fields. Play areas are essential. Concern over the proposed leisure facility on the Council's existing centre. Proposed supermarket would impact on Wealdstone. Difficult to envisage the expected provision of jobs without significant subsidy. Concerns over traffic congestion and capacity of bus services. The position of the school is not good in terms of road safety and it

would have no playing field. All surface water should be dealt with in line with Environment Agency requirements. Adequate healthcare facilities should be provided.
Roxborough Road Residents Association: Concern about effect on traffic congestion. Concern over loss of sports facilities and lack of sports provision for new school – the pitch improvement proposals are inadequate and confirmation sought that the proposed indoor leisure facility would compensate for loss of Zoom Leisure. The proposed retail area would not benefit residents or Wealdstone. Support the provision of housing, elderly accommodation, school, community, healthcare and green space.

Local Residents
Employment
- The land should be used to accommodate a large business that needs office space.
- There are no details of types of business.
- Concerns over the removal of the SIL designation.
- New employment space and jobs welcomed.
- Inadequate provision of employment land.
- Doubt over the likely job delivery from the employment space.
- Is there confidence that the developer can attract business and residential buyers to the area, or see this project through?

Retail
- Concern over development of foodstore, money should be put into Wealdstone High Street, rather than a supermarket that is unnecessary.
- Consideration should be given to moving some retail space to the north/east of the site.
- The proposed retail units will take away business from existing shops, particularly local small shops.

Design and place making
- The retention of the chimney and powerhouse would spoil the project and further consideration should be given to this.
- Comments also received in support of the retention of the chimney and powerhouse.
- Concern that there are inadequate details of the heights of buildings and that the building heights and massing would be excessive.
- What restrictions will be made to prevent residents modifying/extending their properties?

Open space and sports facilities
- Concern over loss of Zoom Leisure (playing fields, tennis courts).
- There must be a green area that can't be built on.
- Concern that the more intensive use of Headstone Manor park would not work as they are already heavily used and this would restrict the park's opportunities for informal recreation.
- Building on the sports ground would impact on the well-being of residents and reduce opportunities for sports/cultural events.
- Object to building on sports pitches and loss of function halls, what reassurance is there that pitches will be re-provided elsewhere?
- Unclear how green link will cross Harrow View.
- Some comments support compensatory measures for loss of playing pitches.
- New allotments should be provided.
- Destruction of green space for building would be unacceptable.
- Concern about possible future development of Headstone Manor Recreation Ground.

- Inadequate re-provision of green space.
- A world class sports facility should be provided and larger scale leisure facilities should have been considered.

Residential amenity, noise and land contamination

- The student accommodation and school should be placed away from the elderly accommodation to prevent noise nuisance.
- New dwellings on Zoom Leisure would overlook neighbours, would result in a loss of property value and there would also be disturbance during building works.
- Concern over land contamination and site security.
- Concern about noise, dust and disruption from building works.
- There would be increased pollution from extra vehicles and domestic gas and electricity.
- Would impact on views from existing residential properties.
- Business space would be too close to residential and would cause noise and disturbance.
- Concern over security around the site boundaries.

Traffic, parking, servicing and highways improvements

- Concerns over the impact of increased traffic congestion and rat-running to the south of Harrow View West (Victor Road) – petition of 141 signatures received in this regard.
- The existing traffic issues on Harrow View concerning the Goodwill to All junction would not be improved by this development and the provision of a new school.
- It should be ensured that all residences have ample parking and that the school has adequate drop off space.
- Concern that roads connect with residential roads to the south, which could cause congestion.
- Transport considerations and improvements are unclear and unconvincing.
- Scheme should link with adjacent Waverley Industrial Estate.
- No indication of bridge over railway line.
- Parking should be provided off-road and prioritised for car clubs.
- Housing close to the station should be car free.
- Scheme should allow for deliveries and visitors.
- Concern about overcrowding on London Midland and Southern train services.
- There would be a burden on local bus services.
- New parking spaces on Headstone Drive (adjacent to shops) should be retained.
- Bakerloo line should be extended into the site.
- Inadequate parking provision.
- Increased traffic would affect pedestrian safety.

Housing and student accommodation

- Concern that large numbers of residential dwellings would result in clustering of ethnic minorities.
- Objection to increase in housing as there is no demand for workers.
- Are the residential units expected to be leasehold or freehold?
- Concerns that the housing would not be genuinely affordable.
- Who would manage the student accommodation and could the land not be put to better use?
- The senior living accommodation is located too far from shops/medical facilities and is too close to the main road and school.
- The proposed housing would be too small.

Heritage

- There is an opportunity to create a new bridge access over Headstone Manor moat.
- Opening up of Headstone Manor needs consideration in terms of security.

Infrastructure and community facilities

- The community hall must be able to serve as a theatre, conference centre and local meeting place.
- Neighbouring secondary schools are oversubscribed, so which school would link to the proposed?
- The school should be moved further into the Kodak site and does not appear to have enough outdoor space/playing field and has inadequate room for future expansion.
- Should ensure that the teaching standards at the proposed school are high.
- Student accommodation and leisure centre would result in more anti-social behaviour and crime.
- The proposed leisure centre is unnecessary given the nearby Council centre.
- Leisure facility should have swimming pool and children's pool.
- Regret that the scheme does not include a community/cultural/recreational facility.
- The school is in the wrong area and will compete with local undersubscribed schools.
- Utilities and services would not cope, particularly water consumption.
- New high school should also be provided.

Sustainability and flood risk/drainage

- All dwellings should be Code Level 5.
- A large PV array should be provided on the roof of the supermarket.
- Proposal could increase flood risk and would burden drains.

Trees

- New planting should include oaks.
- Concern over loss of most of the site trees, which provide screening and wildlife habitat.

General

- The developer should be held responsible for structural faults.
- How will the scheme regenerate Wealdstone?
- Would impact on property values.
- Both sites should retain their original purpose: sports/leisure and industrial.
- Would impact on infrastructure, transport and traffic.
- Extra population would burden medical facilities, hospitals, libraries and bus services.
- New development will create an extra burden on the Council in terms of cleaning and maintenance.
- Consider the proposal to be an over-development of the site.
- The proposal would make the area feel more crowded, in conjunction with other developments.
- Concern over impact of Kodak bankruptcy and provision of a guarantee mechanism to ensure that the development proceeds.
- How will public realm, maintenance, waste management and security be dealt with?
- Will an optic fibre system be laid out?
- An improved police station and ambulance centre is needed.

Court operation

- The proximity of the development to the Crown Court access could affect the operation of

this building.
- Condition requested restricting foodstore deliveries to be outside of the times when the court rooms are in use.
- Lack of a construction management plan and no indication of noise levels that could affect the Court – an acoustic screen should be erected.
- Loss of light due to high buildings.

Advertisement/Site Notice – Second Consultation
Major Development / Setting of a Listed Building / Character of a Conservation Area / Departure from the Development Plan / EIA Development – Harrow Observer 05/04/2012, Expiry 26/04/2012

Notifications – Second Consultation
Sent: 8,345
Replies: 19
Expiry: 23/04/2012

Addresses Consulted – Second Consultation
As above.

Summary of Responses – Second Consultation
Of the 19 responses received following the second consultation, which includes residents associations and amenity groups, 10 supported the principle of the development but raised a number of concerns, 2 raised comment on some elements of the overall proposals but not to the principle for/against the development, whilst 7 objected outright. A summary of the concerns raised is set out below:

Harrow Friends of the Earth: The proposed foodstore should be reduced, not the smaller shops. Disappointed that the school has not been moved. Pleased that no decrease in affordable housing and provision of larger units. Commitment to renewable energy is lacking. Improvements to pedestrian environment to Wealdstone supported, but inadequate detail. Submitted designs for the Goodwill junction would not be acceptable. Permission for Harrow View roundabout should not have been granted. The Green Link would still be severed. There should be no vehicle access to Headstone Manor. Parking standards should be reduced. 10% Travel Plan target is under-ambitious.
Kingsfield Estate Residents Action Group: re-iterate objections to loss of playing fields and sports halls. Supermarket not needed. Bridge to Wealdstone should be provided. Objection to increase in traffic and general overcrowding.
Harrow Agenda 21 Forum: Concern that development economics restrains what can be achieved. Concern about general overcrowding in London. The playing field and sports facilities should be kept. London Boroughs should have more say, not the GLA. Development should provide job opportunities. Traffic generation would be unacceptable. No need for supermarket. A footbridge is needed linking the site to Wealdstone.
Wealdstone Active Community: Access to Wealdstone could be created through Harrow and Wealdstone station, or across the railway line close to the Teachers Centre. A new station could also be created.

Local Residents
Petition
A petition containing 141 signatures has also been received urging the Council to use S.106 money to stop rat-running in local roads.

Other Concerns

- Concern that shared ownership housing would devalue local properties.
- Concern over loss of boundary trees and shrubs.
- Would not want Edward Road extended.
- Objection to retention of chimney.
- Local roads and infrastructure would not cope.
- Concern over loss of leisure facilities and open space.
- Development should offer new employment opportunities.
- Object to increase in population.
- Would support improved local bus services.
- Concerns raised over covenants operating on neighbouring sites.
- Revise Transport Assessment does not address rat-running.
- Would prefer supermarket to be located in Wealdstone.
- Concern over site contamination.
- Proposed green space would be inadequate.
- Would like to see a bowling alley and theatre.
- Development should not exceed 3 storeys.
- Concern about maintenance of open space and roads.

MAIN CONSIDERATIONS

1) Principle of the Development and Emerging Area Action Plan
2) Employment Designation and Strategic Industrial Land Consolidation
3) Provision of Out-of-Centre Retail Use
4) Standard of Design and Layout, Green Grid and Impact on Views
5) Mitigation for Loss of Open Space, Leisure and Sports Provision
6) Residential Amenity and Noise
7) Traffic, Parking, Access, Servicing and Sustainable Transport
8) Housing Provision and Affordable Housing
9) Impact on Heritage Assets and Setting of Headstone Manor
10) Provision of Community Facilities, School and Healthcare
11) Sustainability and Climate Change Mitigation
12) Flood Risk and Drainage
13) Accessibility and Inclusivity
14) Ecology and Biodiversity
15) Land Contamination and Remediation
16) Trees and New Development
17) S17 Crime & Disorder Act
18) S.106 Obligations and Infrastructure
19) Mayoral CIL Liability
20) Consultation Responses

1) PRINCIPLE OF THE DEVELOPMENT AND EMERGING AREA ACTION PLAN

1.1) By virtue of S.38(6) of the Planning Act, the starting points for the consideration of the planning application is the development plan. The Council is required to make decisions in accordance with the development plan for an area, unless other material considerations indicate otherwise. The development plan for Harrow comprises:

The London Plan 2011
The Harrow Core Strategy 2012
The saved policies of the Harrow UDP 2004

1.2) The application site is subject to two key development plan designations, the Kodak industrial site (Harrow View East) being a Strategic Industrial Location (SIL) in the London Plan and Harrow UDP and the former Zoom Leisure centre (Harrow View West) having a proportion of designated open space in the UDP (comprising playing pitches and outdoor sports facilities). The OPA proposes a number of uses that, in pure policy terms, would not accord with these development plan designations (residential, student accommodation, senior living, care home, retail, leisure), some uses which would not accord but have a community benefit (community centre, health centre, primary school) and some uses that would comply with policy (employment and open space). The proposal must therefore be considered as a departure from the development plan.

1.3) The site is located within the Harrow and Wealdstone Intensification Area, as designated in the London Plan, and the Council's recently adopted Core Strategy. Together with the Regulation 25, preferred option consultation draft (January 2012) of the Area Action Plan (AAP), the development plan sets out a number of objectives for the Area, including the provision of 2,800 new homes, the creation of 3,000 new jobs and improvements to open space and public transport. The Core Strategy was formally adopted in February 2012 and the AAP was published as a preferred option consultation document on 12th January 2012 for a six week period of public consultation. Approval of the Regulation 19 (pre-submission consultation draft) of the AAP is currently being sought. Notwithstanding that the AAP is at a relatively early stage in its preparation, the evidence that underpins it is relevant and up-to-date and the document is considered to be a material consideration that is capable of being given weight in respect of this proposal.

1.4) The adopted Core Strategy includes specific reference to the re-development of the application site, reflecting representations received in the document's preparation and the longstanding dialogue at pre-application stage. In particular, the Core Strategy outlines an expectation for an employment led regeneration of the site, where this contributes to the promotion and development of Wealdstone.

1.5) The more specific site objectives for the application, as set out in the latest pre-submission consultation draft of the AAP, are:

- To break the existing trend in industrial decline through employment-led regeneration providing diverse and modern employment space aimed at supporting and growing Harrow's SME, move-on and traditional industrial sectors.
- Integrate new employment offer with the existing Waverley Industrial Estate.
- Improved physical connections with Wealdstone town centre.
- Secure an open space link between Wealdstone town centre and Headstone Manor, including the creation of a physical and visual open space corridor from Harrow View through to the Headstone Manor complex.
- Enabling residential development to create high quality mixed use and family housing.
- Provision for ancillary social and physical infrastructure required to support a new sustainable community.
- Overall increase in the provision of useable and functional open space across the two sites.
- Integration with the surrounding street pattern.

1.6) Whilst recognising that the proposal represents a departure from the development plan policies safeguarding the land for strategic employment and open space uses, the London Plan and Core Strategy both acknowledge that the means to secure sustainable, and new,

employment growth in Harrow, may require some consolidation of existing designations. There is also acknowledgement that such renewal may require a component of 'enabling' development to provide the necessary cross subsidy where values are not supportive of the commercial delivery of new employment spaces. More specifically, Harrow's Core Strategy sets out that in the case of the application site, a mixed use enabling development may be acceptable and the AAP and Intensification Area sees the application site delivering a substantial proportion of the housing targets set in the Borough within the London Plan. Paragraph 22 of the NPPF also states that 'planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.'

1.7) Therefore, notwithstanding the London Plan and the 2004 UDP designations for the site, adopted and emerging policy does provide some support for the *principle* of a comprehensive redevelopment of the site to enable the creation of a sustainable mixed use community, delivering new employment floorspace, enabled by residential development and other uses including retail. The Environmental Information submitted in support of the application does not suggest that there is a specific reason why the uses proposed would not be acceptable in principle on the site. Full consideration of the specific issues raised by the development are undertaken in the appraisal sections.

2) EMPLOYMENT DESIGNATION AND STRATEGIC INDUSTRIAL LAND CONSOLIDATION

Existing Circumstances and Policy Context

2.1) The whole of Harrow View East is designated as a Strategic Industrial Location (SIL) in the London Plan and forms part of the Wealdstone Preferred Industrial Location. The Kodak industrial site has an area of approximately 16 hectares, 73% of the Wealdstone SIL, which also includes the adjacent Waverley Industrial Estate.

2.2) London Plan policy 2.17 affords SILs strategic protection as London's main reservoirs of industrial land. There are two types, Preferred Industrial Locations and Industrial Business Parks. The Kodak site falls within a Preferred Industrial Location (PIL). Part B of this policy states that development proposals in SILs should be refused unless:

a) they fall within the broad industrial type activities outlined in paragraph 2.79 (general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions, utilities, wholesale markets and other industrial related activities); or
b) they are part of a strategically co-ordinated process of SIL consolidation through an opportunity area planning framework or borough development plan document; or
c) the proposal is for employment workspace to meet indentified needs for small and medium sized enterprises (SMEs) or new emerging industrial sectors; or
d) the proposal is for small scale 'walk to' services for industrial occupiers such as workplace crèches or cafes.

2.3) The GLA's Supplementary Planning Guidance: Industrial Capacity (2008) places Harrow in 'limited' category for the purposes of managing the release of industrial land, thereby promoting the limited transfer of land to other uses, taking account of local variations of demand and site circumstances. Boroughs within this category are encouraged to manage and, where possible, reconfigure their portfolios of industrial land, safeguarding the best quality sites and phasing release to reduce vacancy rates for land and premises. The Industrial Capacity SPG identifies Harrow as within the west sub-region, which is apportioned a benchmark for industrial land release of 52 hectares between 2006 and 2026. The GLA

commissioned report, London's Industrial Land Baseline (2010), indicates that the quantum of industrial land released within the west sub-region since 2006 has already exceeded this benchmark. However, Annex 1 of the GLA's Draft Supplementary Planning Guidance: Land for Industry and Transport (February 2012) gives an indicative release benchmark for the Borough of -18.0 hectares for the period 2011-2031.

2.4) As discussed above, the application proposes a number of uses (approximately 65% of the proposed floorspace) that are inconsistent with the SIL designation of the Harrow View East part of the site. Therefore the proposals, prima facie, would not comply with the development plan. However, London Plan policy 2.17 recognises that, in circumstances where such land is surplus to requirements and consolidation of the SIL would contribute to wider regeneration objectives, the release of SIL could be an acceptable departure from the development plan if carried out according to the policy objectives of a Development Plan Document, such as the emerging Harrow and Wealdstone AAP. This is reinforced by Core Strategy policy CS1P, which states that 'mixed use development will be supported, as appropriate, where this secures employment generating development and diversification of Harrow's economy'. Core Strategy policy CS2E states that 'the Council will consider, through the AAP for the Harrow and Wealdstone Intensification Area, the consolidation of the Wealdstone SIL and the local industrial and business use areas (specifically the function and boundary of these designations), taking account of the assessments of industrial land demand and the strategic objectives for the Intensification Area'.

2.5) The AAP is at pre-submission consultation stage and therefore can be afforded some weight as a material consideration given the recent adoption of the Core Strategy. Policy AAP 14 states that 'a proposal for the consolidation of the Wealdstone SIL will be supported where:

a) It can be demonstrated that the proposed types and levels of employment / industrial floorspace to be provided are supported through the findings of a robust economic analysis;
b) The applicant has established, to the Council's satisfaction, the long-term financial viability of the development;
c) The applicant has established, to the Council's satisfaction, that the type and quantum of enabling development is essential to the success of the proposal;
d) The proposal is supported by a comprehensive masterplan that accords with the land uses, layout and design considerations outlined in the site specific guidance;
e) The application demonstrates how the proposal will achieve the AAP's defined objectives for the Wealdstone West sub area, the Wealdstone Central sub area, and for the Intensification Area as a whole;
f) Flexibility is included in the latter stages of the proposal to enable further provision in area and/or floorspace in business or industrial use should earlier phases be successful in attracting additional demand;
g) The proposal will achieve a significant improvement in environmental quality and amenity of the consolidated SIL through appropriate landscaping and high standard of external design and appearance of buildings;
h) The application demonstrates that traffic generated by the proposed activities on site will not adversely affect the existing capacity of the road network or junctions.'

Following any consolidation of the SIL, no further incremental consolidation will be entertained during the plan period.

2.6) It should also be noted that this site is slightly unusual for a SIL designation, as it comprises a single industrial occupier, is directly adjacent to residential areas and is not well

placed in relation to the strategic road network. The designation essentially exists to safeguard Kodak's manufacturing activities on the site, which are in the process of being scaled down, due to a decline in traditional manufacturing activities and changes in the economic climate. Kodak currently employs approximately 570 people on the site, 350 in production jobs and 220 in administrative roles. Approximately 5.4 hectares of the Harrow View East site has been cleared of buildings and has been actively marketed for open storage use, with only limited interest. However, the site lies close to public transport links and local amenities and there is therefore considered to provide opportunities for new industrial and commercial property on the site. A key site objective in the AAP is to break the trend of industrial decline through employment-led regeneration enabling diverse and modern employment space aimed at supporting and growing Harrow's small and medium enterprise (SME), move-on and traditional industrial sectors.

The Proposed Approach

2.7) The OPA proposes a phased, mixed use approach to the redevelopment of the site, delivering up to 35,975sqm of business and employment floorspace in use classes B1, B2 and B8, to be enabled by cross subsidy by commercially viable developments, such as residential dwellings and retail uses. It is noted that Kodak's current operations on the site provide over 88,000sqm of B1 and B2 floorspace, supporting 570 jobs and the proposal would therefore result in a significant contraction of employment floorspace on the site. However, as the indicative table below demonstrates, the scheme could result in a net increase in the number of people employed on the site of up to 1,925 jobs, which would contribute towards the overall AAP target of 2,500 new jobs and would exceed the site specific delivery target of 1,230 new jobs proposed in the AAP.

Use Type	Max Floorspace (GEA)	Minimum Jobs	Maximum Jobs
Phase 1A			
Leisure Centre	1,050	10	30
Community Centre	1,420	10	40
Health Centre	2,560	15	20
Employment – Office/SME Space	3,575	60	285
Retail – Food Store	4,000	190	190
Retail – A1-A5	800	35	35
Phase 1C			
Employment – Offices	5,110	415	415
Care Home – Assisted Living	4,800	25	30
Employment – Logistic/Storage	2,550	32	35
Phase 2			
Employment – SME Space	11,230	195	910
School	3,630	55	55
Care Home/Senior Living	4,300	2	5
Retail – Non Food	200	0	0
Phase 3			
Employment – Industrial/Business	10,520	180	180
Employment – SME/Enterprise	2,990	50	240
Community Use – Kodak Powerhouse	500	5	15
Total	60,105	1,292	2,495
Existing Employment		570	570
Net Increase		722	1,925

2.8) The proposed employment outcomes extend beyond the industrial use classes reflected in SIL policy. The employment outcomes envisaged (reflecting potential demand) would be achieved through a wider range of land uses and increased employment densities, within consolidated areas of employment space, which would principally be located within development zones M and N, to be delivered in phases 2 and 3. The proposals nevertheless also include an element of B1 and B8 floorspace to be delivered as part of phase 1.

2.9) The applicant has submitted an Employment Report, which identifies a substantial SME sector in the local economy, along with a market demand for associated workspace. This report included a variety of studies and separate analyses undertaken at the request of the GLA, as well as Council planning and economic development officers. It is acknowledged that the majority of SMEs employ 5 people or less, but comprise approximately 99% of all businesses in Harrow and are largely concentrated in knowledge based sectors, such as insurance, computing and accounting. These types of business would require class B1 type floorspace, which would not generally fall within the appropriate uses for a PIL, as defined in London Plan policy 2.17 and set out above. The Core Strategy and draft AAP instead seek to steer such uses to Harrow Town Centre.

2.10) However, there is a need to ensure flexibility in the delivery of the employment space on this particular site and it is acknowledged that it may be necessary, depending on the success of the early phases, to facilitate a move towards employment uses that are more akin to an Industrial Business Park (IBP) (i.e. research and development, light industrial, higher value industrial, small scale distribution and other uses that need better quality surroundings). It remains important to manage such uses so that they do not compete with the office market in Harrow Metropolitan Centre, or jeopardise the possibility of growing local manufacturing companies relocating to the site.

2.11) Subject to specific controls to ensure that the type and density of employment floorspace is carefully managed, officers are satisfied that the extent of the employment zones (together with mixed employment/residential uses in Zones C and J) could provide the necessary flexibility to accommodate a range of unit types and sizes to meet what officers expect Harrow's sub-regional employment role to be in the future.

<u>New employment delivery</u>
2.12) The future of the site in employment terms is dependent on the effective marketing, promotion and management of the employment offer within the wider Intensification Area, and within the site. This will require collaboration between the Council, the applicant and other interested parties, such as Harrow in Business or London and Partners. Accordingly, s.106 obligations require the applicant to submit a Marketing and Inward Investment Strategy prior to the commencement of the first phase (excluding phase 1B) . The purpose of this strategy would be to create interest in the scheme and Harrow in general at an early stage which, in conjunction with the proposed 'hub' of retail, incubator offices and community uses propose in phase 1A (discussed in more detail below in appraisal section 3), would act as a catalyst and attractor to new employment generating uses. In addition to this, contributions have been secured to enable the Council to promote the site as a location for local employment, in partnership with the applicant. Contributions have also been agreed in principle in relation to the promotion of local construction skills and employment, as well as complementary town centre management in Wealdstone, which is discussed in more detail in appraisal section 3.

<u>Phasing</u>
2.13) Reflecting the ongoing operations by Kodak on the site, and the need for cross subsidy

and the stimulus to create higher values in commercial/industrial development, the proposals would be brought forward on a phased basis.

Phase 1

2.14) It is intended that the phase 1 employment space acts as a 'landing point' for inward investment. This space would total up to 12,385sqm (including the refurbished Kodak Reception Building) and would comprise hotdesking and business incubation, serviced offices, small light industrial, distribution and self-contained offices and associated community facilities.

Hotdesking and business incubation
2.15) These spaces are typically 150-500sqm, would serve SMEs and would be located close to other facilities such as the nursery and cafes. This would be offered at a peppercorn rent to an operator that can then fund its operations, which would be secured through the S.106 agreement.

Self-contained units
2.16) These would be delivered in three elements across development zones B and E, totalling around 6,125sqm. These units are proposed to meet two different sets of needs. Firstly, the need identified in the Council's Employment Land Review for small industrial and business units and secondly, for more formal SME move-on space, which agents, banks and business support organisations have all said is required in Harrow. This would be a combination of small office space, sometimes in combination with storage and distribution. It is intended that this offer would complement the town centre office market.

Serviced offices and incubation
2.17) This space would be located within the Kodak Reception Building. It is important to ensure that Kodak is able to occupy this building until they decide to re-locate staff to another part of the site or another location. The Reception Building would be refurbished to provide over 5,110sqm of SME space.

Phases 2 and 3

2.18) The application parameters identify up to a further 27,215sqm of business use space, to be located primarily with zones L and M, as well as within the mixed use zones C and J. The format of space within these zones would be dependent on the success of the marketing and inward investment strategy, Kodak's position on the site and the demand for different types of space at the time these phases come forward. The parameter plans allow for a variety of unit types in these areas, including larger units that could provide modern accommodation for some of Harrow's traditional manufacturing sectors, and the Design Guidelines demonstrate how this could be achieved. In terms of the mixed use zones C and J, it is intended that these are set out as 'swing zones', whereby the viability assessment would (in conjunction with consideration of affordable housing provision) determine the provision of employment floorspace in this zone, as opposed to housing. This approach is supported as a means of providing flexibility in the masterplan to maximise employment floorspace delivery.

2.19) In terms of job creation, the figures in the above table are taken from the Employment Densities Guide, which is produced by the HCA. These are therefore indicative job numbers, based on typical scenarios for each type of use. As the application is flexible in terms of use types for phases 2 and 3, it is difficult at this stage to be more precise. If these zones

become attractive to SMEs seeking smaller start-up units, then job numbers are likely to be high, as this space can be delivered at higher densities. Conversely, if a large manufacturing occupier takes space in zones L and/or M, job numbers are likely to be lower, as a B2 manufacturing use would not employ as many people per square metre. Consequently, it would not be appropriate to condition the applicant to deliver a certain number of jobs. The applicant has however agreed to a condition requiring a certain amount of employment floorspace to be delivered within each phase in relation to enabling development and this condition is recommended below.

Contribution to Wider Regeneration Objectives

2.20) In line with the objectives of the Core Strategy and the emerging AAP, it is important that the redevelopment of the application site is required to make a meaningful contribution to the regeneration of Wealdstone and the wider Intensification Area. The applicant's Employment Report states that the development would have the following benefits:

- The scheme would create a variety of employment opportunities, including within the retail, admin and maintenance and security occupations. According to local indicators, a large proportion of these jobs would be accessible to local people.
- The new homes proposed on the site would be likely to generate spending on local goods and services of around £12.3 million per annum, in addition to up to £2.6 million per annum spent by employees working on the site and approximately £1.4 million spent by occupants of the proposed student housing. Given the proximity to Wealdstone and Harrow town centres, it is likely that much of this spending would be captured locally to the benefit of local businesses.
- The development would create environmental improvements, including the provision of the green link (discussed in more detail in appraisal section 4) and public access throughout, proposed public realm improvements to Wealdstone and introduction of activity-generating uses. This would improve the pedestrian environment in the area and the connectivity to Wealdstone, which should benefit local businesses and services.
- The proposal would provide community and social infrastructure in the form of healthcare, education and leisure uses, as well as open space, play space and improved public sports facilities (discussed in more detail in appraisal section 5). This infrastructure would mitigate the impact of the new development, but would also be of benefit to the existing community.

The data and evidence submitted with the application included elements requested by the GLA and Council officers and the findings are considered to be robust and acceptable. The proposal has the potential to deliver significant benefits to the Intensification Area and to Wealdstone, in the form of the comprehensive renewal of the site providing an improved, consolidated employment offer delivered alongside a targeted marketing strategy that could improve the image of Harrow as a whole. In addition, the proposed mix of uses and additional population would also benefit the local area in economic terms.

Enabling Development and Viability

2.21) As discussed in section 1 this application proposes a number of uses that, in pure policy terms, would not accord with the development plan designation in terms of employment uses. The application seeks permission for a quantum of 'enabling development' in order to create revenue to cross-subsidise the proposed employment space. This enabling development principally comprises the residential and retail uses, and to a lesser extent the private leisure facility, care home and senior living. The applicant has engaged with the Council at an early stage in terms of viability discussions and has undertaken a full viability appraisal, which has been reviewed on behalf of the Council by GVA.

2.22) The purpose of the viability appraisal is to demonstrate that the quantum of

employment floorspace proposed is, realistically, the most that can be achieved on this site, along with establishing the maximum provision of affordable housing (discussed below in appraisal section 8) and infrastructure contributions (discussed below in appraisal section 18). Following completion of this work, officers are satisfied that the proposed employment space is the maximum that can reasonably be delivered by the quantum of enabling development proposed, having regard to the provision of affordable housing and when considered in the context of other necessary infrastructure, which is discussed in more detail in the below appraisal sections.

2.23) The conclusions of this investigation support the applicants claims on overall site viability and the delivery of a balanced development that provides infrastructure and affordable housing, alongside new jobs and employment opportunities.

Conclusion and SIL consolidation

2.24) Paragraph 22 of the NPPF states that 'planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose'. It is considered that the proposed consolidation of employment land would be an appropriate response to the particular circumstances of this site, which as discussed is not well placed to support a renewed, viable employment only development.

2.25) In terms of compliance with the criteria set out in London Plan policy 2.17, the proposed consolidation would accord with the approach set out in the AAP (criteria B) and the space proposed would meet an identified local need (criteria C). In terms of compliance with criteria A (broad types of activity for Preferred Industrial Locations), it is acknowledged that much of the proposed employment space would be more akin to an Industrial Business Park. However, officers of the Council and the GLA accept that it may be necessary to facilitate a move towards these types of uses, provided that this is locally justified, would provide a sustainable employment role for the site, would be complementary to operations within the wider SIL and would contribute towards the regeneration of Wealdstone.

2.26) The application includes evidence that identifies a substantial SME economy in the Borough, and broadly demonstrates a market demand for associated workspace. Officers are satisfied that this evidence, which reflects findings in the Employment Land Review (2010) and Outer London Commission findings (June 2010), accurately represents the local employment market. The applicant has demonstrated that larger industrial units can be accommodated as part of the development and B2 general industrial use has been included in the application parameters. On this basis, it is considered that the proposal complies with London Plan policy 2.17 and meets Core Strategy and AAP aspirations for the future of the site in terms of employment delivery.

2.27) In terms of industrial land release and the Mayor's draft SPG on industrial land, officers are satisfied, given the particular circumstances of the site and proposal (as discussed above), that the proposed release of 16 hectares of SIL land (albeit with approximately 2 hectares to be re-provided as part of the development) would be acceptable in terms of strategic employment land supply.

3) PROVISION OF OUT-OF-CENTRE RETAIL USE

3.1) The OPA proposes up to 5,000sqm gross of retail floorspace in total, including a food store of 4,000sqm gross and 1,000sqm gross of other retail/food and drink floorspace (classes A1 to A5). The inclusion of these uses is based on an employment generation,

place making and enabling development argument in the application. The proposed foodstore would be located within Zone A in phase 1A, along with 400sqm of other retail. Zone B, also in phase 1A, would accommodate 400sqm of retail, whilst the remaining 200sqm would be located in Zone N, to the north of the site and within phase 2 of the scheme.

3.2) Neither the adopted Core Strategy or the consultation draft of the AAP, promotes a substantial element of retailing on the site, as part of its comprehensive development. Instead, officers have sought to steer new retail floorspace towards Wealdstone District Centre, or to Harrow Metropolitan Centre.

3.3) Paragraph 24 of the NPPF states that 'local authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan'. It goes on to say that 'they should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered'. Paragraph 26 states that 'when assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500sqm)'. A retail statement has been prepared by CBRE on behalf of the applicant and in response to this, the Council have commissioned Nathaniel Lichfield and Partners (NLP) to undertake a review of this statement.

3.4) Despite the recent deletion of the more detailed policies contained within the old PPS4, the NPPF re-enforces the town centre first approach to retail development. This approach is re-iterated in London Plan policy 4.7 and Core Strategy policy CS1, which directs proposals for convenience retail to Harrow Metropolitan Centre and Wealdstone District Centre. In addition, the practice guide that accompanied PPS4 (Planning for Town Centres: Practice guide on need, impact and the sequential approach (2009)) has not been deleted/superseded and can therefore still be relied upon to provide guidance on the application of the sequential approach and impact assessments.

<u>Sequential Approach</u>

3.5) The Practice Guidance on Need, Impact and the Sequential Approach (paragraph 6.52) sets out a suggested checklist with the following points:

1) What is the scale and form of development needed?
2) Is the need 'location specific' or even 'site specific', or is it more generalised?
3) Are the primary shopping area and wider town centre properly defined in the development plan?
4) How should the site/proposal in question defined? Is it 'in centre', 'edge of centre' or 'out of centre'?
5) Have all more central opportunities been considered/identified?
6) Have they been thoroughly tested, having regard to their suitability, viability and availability having regard to the identified need/demand and the timescale over which it arises?
7) Has this assessment adopted a sufficiently flexible approach?
8) Has the potential to overcome any obstacles to the availability of more central sites been discussed with the local planning authority?

Scale, Need and Flexibility (Points 1, 2 and 7)

3.6) The proposal seeks to provide a new food store. In addition to sales of convenience

goods, large food stores often provide a range and choice of comparison items that are regularly bought during weekly food and grocery shopping trips, such as health and beauty products, medicine, kitchen and household goods and greetings cards. It would not normally be appropriate to disaggregate the sale of these types of goods. Other higher order comparison goods, such as large electrical goods and clothing, are not essential to a food store's primary role as a food and grocery shopping destination.

3.7) According to the applicant's Retail Statement, only 20% of the proposed food store's sales floorspace (560sqm net) is expected to be devoted to the sale of comparison goods. This is considered to be genuinely ancillary to the food sales space. However, it must still be demonstrated that a different format of store in a different location could not meet the identified need. The applicant's statement does not indicate what the minimum size food store would be to meet the identified need. It would therefore be appropriate to consider smaller sequential sites, on the basis that a reduced sales area and parking provision could meet the need. In terms of Point 2 above, the proposed food store would not be considered site specific, because other sites in the Intensification Area could potentially meet the identified need. The applicant's masterplan nevertheless places the food store alongside a range of other commercial uses in a deliberate attempt to establish a sense of place. For this reason, the applicants have argued that the food store addresses a qualitative site specific need (to create a place).

3.8) The application proposals would provide up to 985 residential units and 220 student housing units. The population of the development could therefore be around 2,500, which would in theory generate around £4.13 million of convenience goods expenditure in 2014, although the 10 year phased programme for the development would mean that all the units would not be completed at this time. Based on the job figures set out in appraisal section 2, the employees working within the completed development could be expected to spend around £1 million per year. Accordingly, the maximum convenience expenditure of the completed scheme would be unlikely to exceed £5 million, even assuming a 100% retention of trade from 'residents' of the site. The proposed food store is expected to have a convenience goods turnover of nearly £27 million and the food store proposed is therefore over and above that required to serve the residential and working population on the site. For this reason, it cannot therefore be considered to be meeting only a site specific need, based upon new expenditure. The applicant argues that, in addition to the placemaking function, the size of the proposed store is also driven by commercial requirements from operators.

The Site's Location and Town Centre Designations (Points 3, 4, 5, 6 and 8)

3.9) The Practice Guide states that adopting a sequential approach to site selection means wherever possible seeking to focus new development within, or failing that on well located sites on the edge of existing defined centres. Only if town centre or edge of centre sites are not available, will out of centre locations be likely to be appropriate in policy terms, provided that they are well served by alternative means of transport, and are acceptable in all other respects including impact.

3.10) The applicant concedes that the site is not currently 'edge of centre', but suggests that public realm improvements between the site and Wealdstone can be implemented to make the site 'edge of centre'. In terms of the Practice Guide, an 'edge of centre' site is one that is 'well connected to and within easy walking distance (i.e. up to 300 metres) of the primary shopping area (PSA)'. The applicant considers that the combined primary and secondary shopping frontages form the PSA and points out that the UDP does not define PSAs in the Borough. The PSA is defined in the Practice Guide as the 'area where retail development is concentrated (generally comprising the primary and those secondary frontages which are

contiguous and closely related to the primary shopping frontage)'.

3.11) The application site boundary is over 230 metres as the crow flies to the nearest secondary shopping frontage on Headstone Drive within Wealdstone District Centre (WDC) and some 350 metres to the primary shopping frontage on the High Street. Pedestrian barriers and the location of existing crossings at the Ellen Webb Drive/Cecil Road junction add a further 50 metres to the route and the location of the supermarket entrance within the proposed scheme could add a further 100 metres to the walking route. The applicant asserts that the secondary shopping frontage on Headstone Drive comprises part of the Wealdstone PSA. However, town centre footfall and activity along this part of Headstone Drive is more limited than on the High Street, with the units principally occupied by restaurants and institutional uses. There is also a 40 metre blank return frontage between the end of the parades and the primary frontage on the high street. It is therefore considered that the Wealdstone PSA comprises the primary shopping frontage on the high street.

3.12) Notwithstanding the location of the PSA, public realm improvements and the relocation of pedestrian crossings would not reduce the walking distance to less than 300 metres. The Practice Guide also indicates that barriers for pedestrians should also be taken into account. In this case the railway line, which is poorly lit with narrow pavements, and road network are significant barriers. The town centre cannot be seen from the application site and the proposed food store would not be visible from the PSA. Headstone Drive is a busy/noisy road and currently makes for an unpleasant route for pedestrians. Pedestrians would also need to cross busy roads along the route.

3.13) For the above reasons, whilst officers recognise the potential improvement in linkages promoted as an important part of achieving the AAP and site objectives of supporting Wealdstone's regeneration, officers consider the site to be "out of centre" in sequential terms. Public realm improvements, whilst they might assist in improving pedestrian trips between the site and Wealdstone, would not on their own therefore justify the consideration of the site as an edge of centre location.

3.14) As part of the sequential assessment, the applicant has undertaken an assessment of 13 sites within Harrow Metropolitan Centre and Wealdstone District Centre. This list of sites (set out below) has been agreed with officers and is informed by NLP's 2009 borough-wide Retail Study. The list of sites comprise a mixture of locations either within or on the edge of the PSA, all of which are sequentially preferable locations to the application site.

1) Tesco, Station Road, Harrow;
2) Debenhams store and car park, Harrow;
3) Gayton Road car park and library, Harrow;
4) Harrow on the Hill Station;
5) St Anne's Service Yard, Harrow;
6) 132-176 College Road, Harrow;
7) 51 College Road, Harrow;
8) 221-225 Station Road, Harrow
9) Station car park, Wealdstone;
10) Land north of Canning Road, Wealdstone;
11) Peel House car park and community hall, Wealdstone;
12) Land south of Palmerston Road, Wealdstone; and
13) Former public house, 19 High Street, Wealdstone.

3.15) The Practice Guide states that sites should be assessed in terms of their **availability**,

suitability and **viability**. The Guide states that all the alternative sites must be tested having regard to the identified need and timescale within which it arises. All sites that have potential to be available within a reasonable period of time should be considered and the applicant should also explore the potential to overcome any obstacle to availability of more central sites with the LPA. The LPA should also have due regard to flexibility and whether sites are suitable to accommodate the need the proposal is intended to meet. It should also be demonstrated that the there is a reasonable prospect that development will occur on the site.

3.16) Officers accept that sites 1 and 2 are principally occupied by existing retailers and are therefore unavailable. Site 5 is also unlikely to be available or suitable for food store development. There is no evidence to suggest sites 3, 4, 6 or 7 will be available within a reasonable period of time. It is also accepted that sites 8, 9, 10, 12 and 13 are too small and/or irregular in shape and cannot accommodate a large food store, and as a result are unsuitable for the proposed use.

3.17) The earlier AAP considered that a real opportunity for a food store existed on site 11, the Peel Road car park (multi-storey and surface level) and adjacent community hall in Wealdstone. The site is located to the east of Premier House, which is adjacent to the High Street and abuts George Gange Way to the east, so is therefore approximately 50 metres from the PSA. The site is Council owned and was allocated for a food store with car parking provision in the previous draft of the AAP.

3.18) The Council accordingly sought specific comment and examination of the initial assessment submitted on this sites suitability from its consultant, NLP. NLP's view is that it would be physically possible to accommodate a single level food store of up to 2,500sqm gross (1,700sqm net) on this site, with decked car parking either below or above and the site is therefore potentially suitable for a food store of this size. The site is in the ownership of the Council, so could theoretically be brought forward for development over the next three to five years. However, the Council would need to formally identify the site as surplus to requirements and actively market it to potential food store operators. Provided the Council can demonstrate that the site is available, the viability for a food store of 2,500sqm gross would need to be considered in more detail, having regard to the constraints of the site, any exceptional development costs and market conditions.

3.19) The applicant's Supplementary Retail Statement disagrees with this conclusion. It contends that the Peel Road car park site is not sequentially preferable, on the basis that:

- It is not available, given the multiple ownerships and requirement to re-provide the existing community use, the lack of evidence that landowners are willing to release properties and, should it be required, the lack of clarity that compulsory purchase would be possible.
- It is not suitable, given that, amongst other things, it is too small to accommodate a store of a size which is capable of competing with other large format foodstores and, even if a store of 2,000-3,000sqm were to be provided, few of the Council's urban design aspirations for the site could be realised.
- Development may not be viable, given that the largest store the site could accommodate is unlikely to be attractive to operators seeking a large format store and the likely high development costs.

In support of this case, the applicant has submitted a study on the scope for compulsory purchase, as well as a study on site configurations for the Peel Road car park site.

3.20) Officers consider that, whilst obstacles relating to land ownership could be overcome, it would be difficult to accommodate a food store of an appropriate size to be attractive to the

market, having regard to site constraints, development costs and the Council's design objectives. The scenarios set out in Appendix C of the applicant's Supplementary Retail Statement suggest that the constricted nature of the site (site area, surrounding properties and levels changes), the need to provide servicing areas, the desire to re-introduce the historic street pattern and the need to re-provide town centre car parking makes the development of the site for a food store in excess of 2,250sqm gross unlikely. The applicant states that 'a store of 2,000-3,000sqm gross will also be of little interest to the market'.

Smaller Units

3.21) Concern was raised by officers in relation to the applicant's original Retail Statement, which did not investigate the scope for disaggregating the smaller A1-A5 units, originally proposed at 2,000sqm gross. The applicant states that, in addition to the proposed food store, this additional space is also driven by a desire to create a sense of place in the development and animate the southern part of the Green Link with active frontages, as well as to provide a range of services to support the proposed employment floorspace.

3.22) As part of the submitted Supplementary Retail Statement, the applicant recognises that 2,000sqm gross floorspace may not be required and at least some of it could be accommodated in vacant units in Wealdstone District Centre. The amendments made to the application in March 2012 therefore reduce the overall amount of A1-A5 floorspace outside the food store by 50%, to a total of 1,000sqm gross, with 800sqm provided in the south eastern part of the site (400sqm in Zone A and 400sqm in Zone B) and 200sqm provided in the northern part of the site (within Zone N). A flexible permission is sought, allowing the uses to include shops (A1), financial and professional services (A2), restaurants and cafes (A3), public houses (A4) and hot food takeaways (A5).

3.23) The applicant anticipates that the proposed A1-A5 units in Zones A and B would be likely to be attractive to pub/bar operators and a restaurant operator, with other uses likely to include a small coffee shop/sandwich bar, as well as a barber/hairdresser. It is argued that these uses are required to animate the public open space and the scope of services provided by the occupiers of these units are likely to have a relatively small catchment. The units to be located in Zone N of the development are anticipated to be occupied by uses that serve residents of the development, or employees working within the scheme. The applicant argues that it would not be appropriate to locate these services within Wealdstone, given that they would provide appropriate smallscale 'pop in' facilities for residents and employees.

3.24) Officers' view is that these smaller units could be located within Wealdstone District Centre, but it is accepted that a certain amount of retail/café space is required to create active frontages within the scheme and contribute to the creation of a sense of place. Consideration of the acceptability of the quantum of floorspace proposed will need to incorporate consideration of the likely impact of these units, which is undertaken below.

<u>Retail Impact</u>

3.25) According to paragraph 26 of the NPPF, proposals for retail and town centre uses that are not located within an existing centre or in accordance with an up to date development plan must be accompanied by an impact assessment, if the development is over a proportionate, locally set floorspace threshold (set at 2,500sqm in Harrow). This should include assessment of:

- The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the

application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.

3.26) Paragraph 27 of the NPPF goes on to state that 'where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it should be refused'. This is reinforced by London Plan policy 4.7 and saved UDP policy EM5, which requires an impact assessment to be carried out for any edge or out of centre retail development.

Convenience Goods Trade Diversion and Impact
3.27) The applicant's Retail Statement outlines the propensity for large food stores to compete with other large food stores. NLP have carried out an impact assessment on behalf of the Council, based on their 2009 retail study. The assessment examines trading patterns in the base year 2011 and design year 2014, assuming no food store development, with the Tesco and Morrisons commitments in Harrow, and then assessing the implications of the proposed food store development in 2014.

3.28) Assuming no development, NLP's assessment concludes that the amount of annual convenience expenditure attracted to facilities in the Borough is expected to increase from £320.52 million to £332.48 million due to expenditure growth between 2011 and 2014. Assuming the development of the recently approved Tesco extension and the new Morrisons store under construction at Neptune Point, this figure is expected to increase to £342.03 million in 2014. At this time, the total turnover of facilities in Harrow Metropolitan Centre, including the Tesco extension and new Morrisons store, is estimated at £79.75 million. The turnover of Wealdstone District Centre is estimated to decrease from £6.74 million to £6.44 million, an impact of 4.5% based on the impact of existing permitted schemes.

3.29) Taking into account the proposed food store, the convenience expenditure in Harrow is expected to increase from £342.03 million to £349.20 in 2014. Consistent with the applicant's approach, NLP's study concludes that a significant proportion of the proposed food store's trade is expected to come by way of diversion from large food stores surrounding the catchment area. The highest proportional cumulative impact would fall on Tesco, the Morrisons at Neptune Point and the Morrisons at Hatch End, as set out in the table below.

Store	**Benchmark Turnover 2014**	**Turnover Post Developments 2014**	**Difference**
Tesco, Station Road (as extended)	£41.40 million	£29.28 million	-£12.12 million (29.3%)
Morrisons, Neptune Point	£28.80 million	£24.94 million	-£3.86 million (13.4%)
Morrisons, Hatch End	£26.70 million	£26.49 million	-£0.21 million (0.8%)

The main issue in this case is the level of trade diversion and impact on Wealdstone District Centre and Harrow Metropolitan Centre.

Wealdstone
3.30) Taking into account the proposed food store, the turnover of Wealdstone District Centre is estimated to decrease by 11.4% (£6.47 million down to £5.97 million), which would

be 8% below 2011 levels, and therefore the cumulative impact will only partially be offset by growth between 2011 and 2014. NLP estimate that the proposed food store would divert £0.47 million of convenience expenditure from Wealdstone, on top of the £0.3 million diverted by other commitments in Harrow Metropolitan Centre. These estimates suggest that the applicant has underestimated trade diversion from Wealdstone.

3.31) It is likely that trade diversion would be concentrated mainly on the three main food stores in Wealdstone; Sainsbury's Local, Tesco Express and Iceland. Given that these stores primarily serve a top up and day to day shopping function, NLP agree with the applicants Retail Statement, which concludes that it is unlikely that the stores would be forced to close. There would be some trade diversion from other small convenience shops and it is possible that a small number of shops could close. The applicant identifies the vacancy rate in Wealdstone to be 16.7%, which is higher than the national average. Closure of one or two convenience shops would not significantly increase the overall vacancy rate or undermine the range and choice of food and grocery shopping facilities in the centre. Clearly, given current trading challenges, this would be a negative impact of the proposal. Nevertheless, subject to appropriate mitigation through the legal agreement that can help to target improvements in the Wealdstone retail offer, officers consider that this consequential impact, as well as the possible indirect impact on other services in Wealdstone due to loss of linked trips (discussed in more detail below) needs to be balanced against other wider objectives of the scheme.

Harrow

3.32) The amount of trade diversion from the Tesco store to the Harrow View proposal would be £4.13 million, or 22.5% (this proportional figure is higher than that of the applicant, as NLP take into account cumulative trade diversion to the new Morrisons store at Neptune Point). Taking into account the completed Morrison's store at Neptune Point, it is estimated that the Tesco store would be trading 18% below company average in 2014. Once the proposed store at Harrow View is factored in, this increases to just under 30%. It is not unusual for food stores to trade below company averages and this level of underperformance does not indicate the store is unviable. NLP consider that it is unlikely the Tesco store would close, or that the proposed extension would be jeopardised. The key issue is the knock on implications for Harrow Metropolitan Centre.

3.33) NLP estimate cumulative trade diversion from other convenience goods facilities in Harrow Town Centre to be £2.02 million, an impact of 10.7%. It is likely that most of this would come from the Marks & Spencer and Iceland stores. NLP's 2009 retail study suggested that the expected benchmark turnover of convenience goods facilities in Harrow Town Centre (excluding Tesco) is £16.62 million. The projected residual turnover of these facilities in 2014 (including the proposed food store at Harrow View) is slightly higher at £16.83 million. It is therefore considered that there would not be a significant impact on convenience goods shopping facilities in Harrow Town Centre and the number of food and grocery shopping trips made to the centre is likely to increase significantly due to the new Morrisons store currently under construction. The residual total convenience goods turnover of facilities in the centre, including the extended Tesco and completed Morrisons, is estimated at £71.06 million, compared with the 2011 turnover of £54.57 million.

Neighbourhood parades

3.34) The applicant's original Retail Statement did not address the impact of the proposed convenience floorspace on local parades (or Neighbourhood Parades, as they are known in the Core Strategy). There are a number of Neighbourhood Parades in the vicinity of the site, most notably the collection of units located around the Harrow View/Headstone Drive

junction (Headstone Drive/Headstone Gardens/Harrow View/The Quadrant parades), which in terms of convenience provision, includes a greengrocer, butcher and a number of convenience stores. The applicant's Supplementary Retail Statement argues that these stores would be unlikely to see a significant diversion of trade to the proposed food store, indeed it is argued that the increase in population (both residents and employees) on the site as a result of the proposal, would in fact be beneficial. Given that the proposed food store would be likely to compete mainly with other food stores and not smaller shops in nearby centres, officers concur with this view. It is therefore considered that the proposed food store would not significantly impact on nearby Neighbourhood Parades.

Comparison Goods Trade Diversion and Impact

3.35) NLP's assessment of the applicant's Retail Statement concludes that, provided the comparison floorspace in the proposed food store is limited by condition to no more than 560sqm then the goods sold are likely to be typical of a large food store. The majority of the non-food turnover is therefore likely to be diverted from other large food stores, rather than small shops in nearby centres, which would not give rise to a significant adverse impact.

3.36) In response to NLP's comment that the comparison goods impact has not been fully assessed, the applicant has provided an assessment of the likely impact of the smaller A1-A5 units (totalling 1,000sqm gross) as part of the Supplementary Retail Statement. As the application seeks a flexible permission, it is not clear at this stage who will occupy these units. The applicant states that the units would most likely be occupied by A3, A4 and A5 uses to serve the residential and working population of the development. The applicant suggests that there would not be a significant trade draw from existing restaurants, cafes, pubs or takeaways within Wealdstone or nearby Neighbourhood Parades, as these uses would largely serve the future population of the proposed development. The Supplementary Retail Statement also indicates that there may be some limited demand for A2 uses, which could include estate agents or financial and professional services. The applicant considers that the impact of these uses would be dispersed across Wealdstone District Centre, which already includes a range of these uses.

3.37) The applicant does not anticipate that there would be much demand from A1 comparison occupiers, although the Supplementary Retail Statement does include a modelled scenario whereby 25% of the floorspace in Zones A and B (140sqm gross) is given over to the sale of A1 comparison goods. This indicates an annual turnover of approximately £700,000, which would not result in a significant adverse impact.

3.38) The total quantum of retail space proposed would be 5,000sqm gross, with 4,800sqm proposed in phase 1A. It could be argued that this would result in the creation of a new 'neighbourhood centre'. However, given the conclusions of the convenience impact assessment set out above and subject to the identification of resources to support Wealdstone's existing offer through the s.106, it is considered that the principal impact of the proposed food store would be on existing food stores and not on Wealdstone District Centre or Neighbourhood Parades. The remaining retail floorspace in Zones A and B, a total of 800sqm gross, would be less than half that of the nearby Neighbourhood Parades around the "Goodwill junction" (total of 1,673sqm) and a fraction of the floorspace of Wealdstone District Centre (total of 25,107sqm). It is therefore considered that the quantum of retail uses proposed in the first phase of the development would not amount to a higher order retail centre, as compared to Wealdstone and the nearby Neighbourhood Parades.

3.39) Officers consider that the additional justification provided as part of the Supplementary Retail Statement, in conjunction with the reduction in proposed retail floorspace from

2,000sqm to 1,000sqm for the smaller units, demonstrates that this part of the proposal would not have a significant adverse impact on nearby shopping centres and Neighbourhood Parades.

Linked Trips

3.40) NLP's assessment suggests that customers diverted from Wealdstone District Centre and Harrow Metropolitan Centre to the proposed food store would be less likely to link their food and grocery shopping trip with other shopping in the centres and other local shops. Conversely, the proposed food store would attract new food and grocery shopping trips to Wealdstone that could generate trips not currently made to Wealdstone or local parades. If suitable public realm improvements can be delivered to encourage and nurture these "linked trips", this could have a beneficial impact that would contribute towards offsetting the impact on Wealdstone from the identified trade draw.

3.41) The proposed food store is expected to divert food and grocery shopping trips from Wealdstone District Centre totalling £0.47 million and these trips could have been combined with other non-food and non-retail related trips, i.e. linked-purpose trips. Given the current retail offer in Wealdstone, most of this trade diversion would be from top-up shopping trips and the average spend per diverted trip would be likely to be around £15 per trip. Based on an average spend per trip of £15, £0.47 million would represent 31,300 trips per annum lost to the District Centre. If as a maximum 70% of these trips were linked with non-food shopping in Wealdstone, the District Centre could lose up to 22,000 non-food shopping trips if the proposed store is implemented.

3.42) The convenience turnover of the proposed food store is estimated to be £26.88 million. The average spend per trip is likely to be higher than £15, because the store will attract main and bulk food shopping trips as well as top-up shopping trips. Based on an average spend per trip of £30 the proposed store is expected to attract 896,000 trips per annum. In order to offset lost linked trips to Wealdstone (a maximum of 22,000 trips per annum), 2.5% of all trips made to the food store would need to be linked to a trip to the District Centre. At present, the linkages between the site and Wealdstone are poor (discussed in more detail above) and a very small proportion of customers are likely to walk to the centre from the proposed store. Improvements to the public realm would improve this situation, but the majority of shopping trips to the proposed store will be by car and some customers may drive to the District Centre to shop before or after visiting the proposed food store.

3.43) On balance, given the proposed store's proximity to the District Centre and subject to improvements to the link with Wealdstone, officers' view is that it is possible that more than 2.5% of trips made to the store would be linked to a trip to Wealdstone. This is supported by the wide range of shops and services in Wealdstone, including a post office, hairdressers, clothing stores, specialist food stores, dry cleaners and banks, as well as the provision of extensive public car parking. A financial contribution has also been agreed towards public realm improvements between the site and Wealdstone.

3.44) The reduction in floorspace of the smaller units from 2,000sqm to 1,000sqm would not, in the opinion of officers, result in a neighbourhood centre and it is therefore considered that the proposal would be less likely to result in significant retention of linked trips within the development itself.

<u>Conclusion</u>

3.45) In summary, even if public realm improvements were carried out between the site and Wealdstone District Centre, the site cannot be considered as edge of centre. The scale of the

proposed food store (4,000sqm gross) is over and above that required to serve the residential and working population of the proposed development and therefore cannot be considered site specific.

3.46) The Retail Statement submitted identifies a number of sequentially preferable sites for such a store. A number of these were discounted following the assessment. The most likely opportunity for a large food store is the Peel Road car park site and adjacent community hall in Wealdstone. The applicant has submitted an assessment that expressed concerns over its availability, suitability and viability. Officers have reviewed this information and accept the conclusions.

3.47) The applicant argues that the additional 1,000sqm gross of proposed mixed retail floorspace (use classes A1-A5) is necessary in part to provide for the day to day needs of the future residents and employees within the development. Whilst it is considered that the quantum of floorspace proposed is above and beyond what is necessary, officers accept that a certain amount of retail floorspace is required to animate the active frontages within the scheme and contribute to the creation of a new place, in conjunction with the mix of uses proposed in phase 1A (food store, community centre, health centre, student accommodation, employment and residential uses).

3.48) The applicant's assessment of impact (independently reviewed on behalf of the Council by NLP and discussed in more detail above) concluded that the proposed food store would have some impact on other food stores in the locality, but would not result in a significant impact on nearby town centres (Wealdstone District Centre and Harrow Metropolitan Centre) or Neighbourhood Parades. The acknowledged impacts need to be considered with other material considerations. In order to offset lost linked trips to Wealdstone, 2.5% of all trips made to the food store would need to be linked to a trip to the District Centre and, provided improvements to the route between the proposed store and the town centre are carried out, officers consider this to be reasonably achievable.

3.49) The reduction in floorspace of the smaller retail units from 2,000sqm to 1,000sqm (combined with moving 200sqm to the north of the site) has reduced the extent to which the proposed uses could form a neighbourhood centre and retain linked trips within the scheme to an acceptable degree.

3.50) On balance, weighing up the benefits and disbenefits of the proposal as detailed above, officers consider that, whilst the obstacles with the Peel Road car park site may be able to be overcome, the proposed food store, in conjunction with other committed schemes in the catchment area, would not have a significant adverse impact on nearby Wealdstone District Centre and if public realm improvements are carried out to improve links to the Centre, could in fact have a positive impact in terms of vitality and viability. The proposed smaller units, at a total of 1,000sqm gross floorspace coupled with the proposed dispersion across the site, would not result in a concentration of retail that would individually, or in conjunction with the proposed food store, adversely affect Wealdstone or the nearby Neighbourhood Parades. In fact, it is considered that the likely new residential and working population of the development would probably have a positive impact on the vitality and viability of these retail areas.

3.51) As discussed above the applicant considers the proposed retail floorspace to be site specific, as it serves a placemaking function and provides a form of enabling development, alongside providing 190 jobs. Officers recognise the need to create a critical mass of activity in the early phases of the development and the contribution to the viability of the

development that can be achieved as a result of the proposed retail uses. The NPPF does however reinforce the 'town centre first' approach to retail development that was set out in earlier policy documents and it may be possible for sequential sites to meet the identified need. The possible negative impacts must be balanced against the potential positive impacts and other considerations. The results of the impact assessment and the Council's own assessment of this set out above indicate that the proposed retail floorspace would have an acceptable impact on Wealdstone District Centre and Neighbourhood Parades and could in fact have a positive impact by reason of increased footfall in the Wealdstone area. Critically, the proposed 4,000sqm food store would be necessary, as the size is driven by commercial requirements and the need to be large enough to compete with other food stores, rather than nearby shopping centres. In accepting that the retail food store forms a component of enabling development, as part of this mixed use proposal, the implication and impact arising from the out of centre development is considered to be acceptable as a departure from the normal application of retail planning policies contained within the NPPF and London Plan policy 4.7.

3.52) It is nevertheless considered necessary to impose conditions restricting the retail uses. Conditions are recommended to restrict the total sales floorspace of the food store to 2,800sqm net and to ensure that no more than 560sqm net of the floorspace is used for sale of comparison goods, in order to ensure that the food store does not compete with nearby shopping centres to an unacceptable degree. A condition is also recommended to limit certain uses that might otherwise be considered ancillary to the food store, such as post office facilities or opticians. In addition, a contribution towards public realm improvements between the site and Wealdstone and town centre management is required. The applicant has also agreed to provide six parking spaces to the south of development Zone G, along with pedestrian access to the Neighbourhood Parades around the 'Goodwill' junction and this is a requirement set out in the Development Specification.

4) STANDARD OF DESIGN AND LAYOUT, GREEN GRID AND IMPACT ON VIEWS

Policy Context and Key Design Considerations

4.1) The NPPF states (paragraph 64) that 'permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions'. Paragraph 66 states that 'applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community' and this is reinforced in London Plan policy 3.7, which seeks the involvement of local communities and stakeholders in the planning of large developments.

4.2) Core Strategy policy CS1 states that 'all development shall respond positively to the local and historic context in terms of design, siting, density and spacing, reinforce the positive attributes of local distinctiveness whilst promoting innovative design and/or enhancing areas of poor design'. Saved UDP policy D4 states that 'the Council will expect a high standard of design and layout in all development proposals'.

4.3) Policy AAP3 of the emerging Harrow and Wealdstone Area Action Plan states that 'development within all three Wealdstone sub areas will be required to strengthen the district centre's vibrancy and vitality, and improve the environment and identity of the Wealdstone area as a location for business and industrial activity and for family living'. This policy goes on to state that 'proposals for the development of identified opportunity sites within the three Wealdstone sub areas should be in general conformity with the masterplan for each site'. Specifically in relation to Harrow View East, development should, amongst other things, support Wealdstone's strategic employment function, improve pedestrian and cycle connections and contribute to open space provision, including delivery and enhancement of the Green Grid.

4.4) The proposals have been subject to three rounds of public consultation. In particular, the consultation exercises, involving both workshops and more informal 'drop in sessions' have sought to secure local perspectives around the future role and purpose of the site. In addition, the applicant has engaged with the Core Strategy and AAP workshops and consultation activities and consulted with key business stakeholders. The applicant claims that these events, together with the contextual analysis, engagement with officers from across the local authority and GLA family, and the MDP, have helped to inform the masterplan.

4.5) Having regard to adopted policy, the emerging AAP and responses to consultation, officers consider the overarching design objectives for the redevelopment of this site to be:

1) Open Space The provision of a generously dimensioned, contiguous, green public route that acts as a primary characteristic for the whole site, holds a range of non-residential uses around its edges in buildings with special character and height and links Headstone Manor to Headstone Drive and Wealdstone.
2) Connections Establish clear connections and continuity to Wealdstone Town Centre and complement surrounding street patterns, including tackling level changes and protected trees along the site boundary with Harrow View.
3) Character Provide a strong character of new buildings set within a larger green landscape and street structure consistent with the sites location in the heart of "Metroland" and including an integrated public realm that is part of an overall urban design approach, responding to Wealdstone's position and ease of access to the countryside.
4) Vitality Gather employment and community uses at the south and east of the site, reinforcing a relationship with the Waverley Estate and Wealdstone and ensure that

existing retail parades on Harrow View and Headstone Drive are able to benefit from the development.

5) Legacy Kodak operational buildings and distinct industrial legacy include unique features such as the chimney that should be considered for retention as an aspect of the history and identity of the area.
6) Density and Scale Densities and building typologies to reflect land uses, location within the site and the mixed use activity.
7) Phasing and Flexibility Ensure that employment uses are phased throughout the scheme and designed to contribute positively as part of the overall place, whilst ensuring that the parameters have the flexibility to accommodate a range of business needs.

The Design Response

4.6) As this application is submitted in outline, with all matters reserved for future determination, the detailed design, layout and elevational form of buildings is not before the Council. The application is however accompanied by the following documents that seek to explain the design and layout:

Parameter Plans – These set design parameters in terms of site layout, maximum building heights and provision of open space.
Design Guidelines – Sets out detailed design guidance for future phases on matters such as massing and scale, frontage, access, orientation, amenity, architectural character and materials.
Development Specification – Fixes certain characteristics of the development, including internal routes, frontages and which phase each zone falls into.
Indicative Plans – Provide an indication of how the development could come forward.
Design and Access Statement – Provides a narrative as to the vision, objectives, design principles and key design elements of the scheme, including masterplanning and site layout, open space, character areas and landscaping.

4.7) The layout of the principle routes, spaces and development blocks is indicated by the Parameter Plans and would be fixed as part of any planning decision. The parameter plans describe a continuous area of open space (the 'Green Link') leading from the south east corner of the site, through Harrow View East and across Harrow View itself, leading to Headstone Manor. Set around this is a network of pedestrian and vehicle routes, which form a legible arrangement that link into surrounding streets like Victor Road.

4.8) The overall urban design approach to the site has evolved from a list of key objectives set out in section 2.2 of the applicant's Design and Access Statement (DAS), which include the creation of:

- Long term economic energy and vitality, that can spill into areas beyond the site;
- New links of public amenity spaces through the site, integrating into adjacent areas;
- New places and spaces for Harrow – and new opportunities for play and amenity;
- A place that allows people to lead sustainable lifestyles – working or living;
- Enhancement to existing and delivery of new services going beyond the site;
- Fresh lifestyle opportunities – raising the profile of Harrow as an attractive and exciting place;
- A work – live – play destination; and
- A high quality, green and sustainable development with a workable mix of housing types and tenures.

The language of the above objectives, such as 'economic energy and vitality', 'places and

spaces' and 'green and sustainable', relate well to the strategic site specific objectives set out in the AAP and the Core Strategy objectives for the Intensification Area. The DAS provides a comprehensive analysis of the character and appearance of the existing site and wider area, including an outline of the historic development of the area.

4.9) The document also sets out a number of masterplan principles for the development, notably the 'Green Link' (discussed below under Open Space), 'neighbourhood concepts' and 'employment strategy'. These principles detail the overall vision for the scheme, which in the south east area would comprise an 'enterprise hub' for SMEs, leisure, retail and civic uses. Employment consolidation and expansion would be located in the north/north east, adjacent to the railway line, whilst the remaining area would comprise a variety of residential forms, arranged around open spaces. The DAS explains how and why the scheme has evolved through the phases of public consultation, before providing a more detailed narrative of individual elements of the masterplan, such as housing density and typology, architectural character zones, parking and sustainability.

The key design considerations are addressed in more detail below:

Open Space

4.10) A key design objective for the scheme is the provision of a continuous, green public route through the site – enabling a Green Link between the edges of Wealdstone and Headstone Manor. The AAP envisages this as more than simply a tree-lined boulevard, but rather a generous, usable area of open space that will link Wealdstone with the open space at Headstone Manor and the Green Belt beyond and this aspiration also includes the creation of green public spaces, at intervals along the link. The key considerations in relation to this element of the proposal relate to:

- the **amount and width** of the Green Link as shown on the Parameter Plans;
- the **extent of actual green** space within the Link (determined largely by detailed studies contained within the Design Guidelines (DG) and DAS);
- the quality of **public spaces** to be created throughout the link; and
- the extent to which the Link is perceived to provide a **connection** between the two distinct parts of the site and consequentially to the green grid.

These elements are considered in more detail below.

Amount and width

4.11) The site specific objectives set out in the AAP seek an overall increase in the provision of useable and functional open space across the two sites. Parks and gardens, amenity greenspace, play areas, outdoor sports facilities and civic spaces all fall within the definition of open space. In the context of this site, the existing open space provision comprises the outdoor sports facilities on the former Zoom Leisure centre, which has a total area of 52,310sqm and comprises sports pitches, tennis courts and bowling greens (a full schedule of provision is included in appraisal section 5). This area is designated as open space in the UDP, although it is acknowledged that this is private land with no public right of access. Much of this open space would be re-provided in the form of the proposed Green Link.

4.12) The total area of the proposed Green Link as shown on the Parameter Plans would be 51,177sqm, which would leave a shortfall of 1,133sqm. The application therefore also proposes a number of other areas of open space, including play areas, multi-use games areas (MUGAs) and amenity greenspace, which would be located within the individual development zones. The requirement for these spaces is fixed through the Development

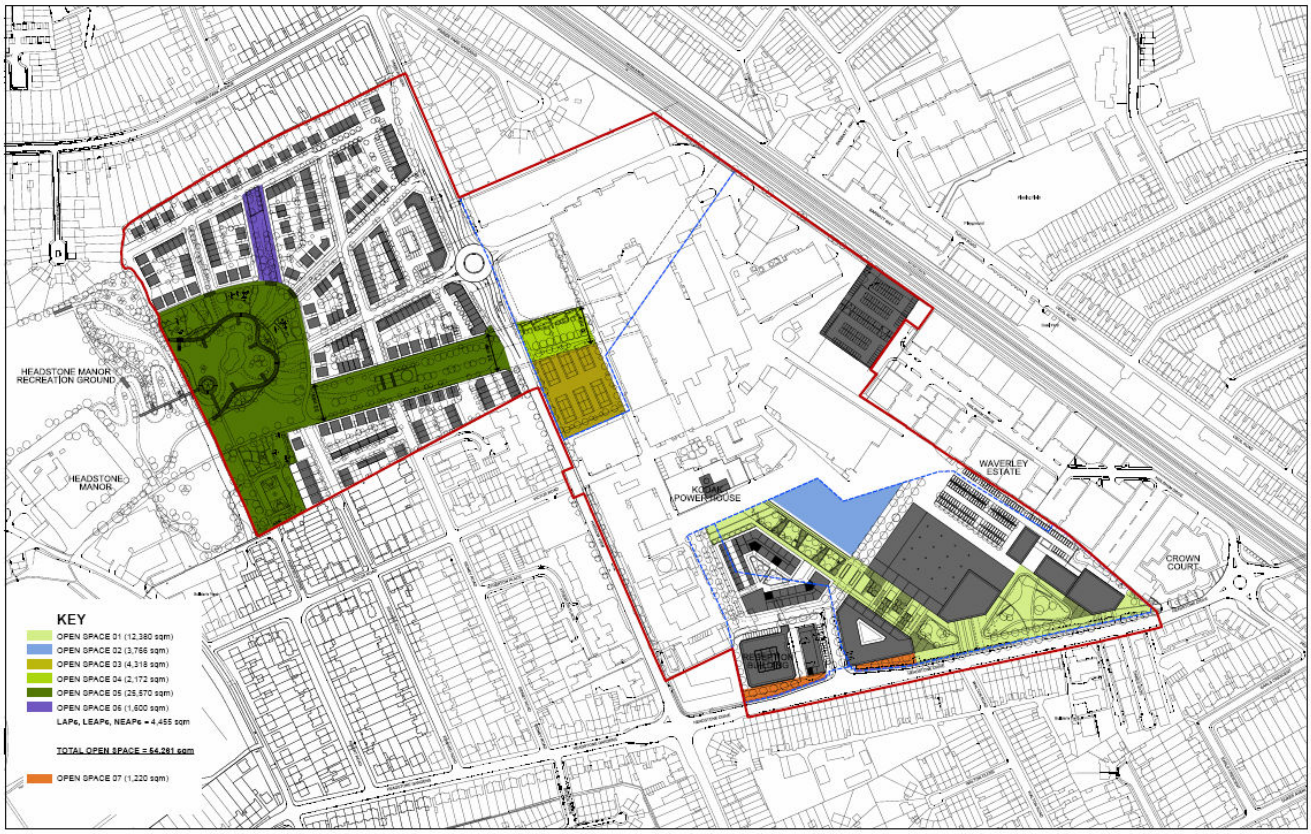
Specification and Design Guidelines. These spaces, along with the Green Link, are detailed in the table below:

Description of Open Space	Area (sqm)	Typology/Notes
Harrow View West – Headstone Manor Park and Green Link	25,176	Urban Park/Green Corridor
Harrow View East – Kodak Green and Green Link	17,117	Urban Park/Green Corridor
Harrow View East – Community Gateway/Civic Square and Green Link	8,884	Civic Space/Green Corridor
Local Play Areas (LAPs) in zones C, G, H, N, Q, R, S and T (225sqm each)	2,475	Playspace
Locally Equipped Play Areas (LEAPs) in zones D, P, Q and T (485sqm each)	2,425	Playspace
Neighbourhood Equipped Play Areas (NEAPs) in zones J and R (850sqm each)	1,700	Playspace
Harrow View West – Zone T 'Green Finger'	1,742	Amenity Greenspace
MUGA within primary school	470	Outdoor Sport
Total	**58,247**	**= Increase of 5,937sqm**

4.13) The table demonstrates that, when all proposed public open space is taken into account and upon completion of the masterplan there would be uplift in the quantum of useable and functional open space across the whole site of 5,937sqm. These areas are all fixed within the Parameter Plans, Design Guidelines or Development Specification and do not include other areas of landscaping or private gardens, which would also be provided. Given that access to the Green Link is anticipated to be unrestricted, the proposals would accord with AAP aspirations for the development and provide both a qualitative and quantitative improvement over the existing situation.

4.14) Given the phased nature of the scheme, it is also important to ensure that the 52,310sqm of open space is re-provided at the end of each phase of development. The existing open space on Harrow View West would be developed as part of the first phase, but the Green Link would not be completed until phases 2 and 3 are built out, Accordingly, it is considered necessary to ensure that an appropriate strategy is in place to re-provide at least the same quantum of open space in an acceptable form, at the end of the first phase of development.

4.15) An outline open space strategy has been submitted by the applicant, which sets out the intended approach. It is proposed to designate a part of the Harrow View East site within development zone C as 'meanwhile space', whereby areas of cleared land would not be brought forward for development until the full extent of the Green Link has been built out. These areas would be provided as public open space at the end of the first phase. It is also proposed to provide a section of the Green Link that would fall within phase 2 of the development (to the south of the proposed primary school, which would also be provided in the first phase) as well as a further area of open space on cleared land adjacent to this. The plan below shows where these spaces would be located:



The table below sets out the quantum of each of these areas:

Map Colour	Description	Area (sqm)	Typology/Notes
Dark Green	Harrow View West – Headstone Manor Park and Green Link	25,570	Urban Park/Green Corridor
Dark Blue	Harrow View West – Zone T 'Green Finger'	1,600	Amenity Greenspace
Lime Green	Harrow View East – Green Link Adjacent School	2,172	Green Corridor
Mustard Yellow	Harrow View East – Zone H	4,318	Hold Back – Interim Amenity/Outdoor Sport
Light Green	Harrow View East – Green Link Phase 1A	12,380	Green Corridor
Light Blue	Harrow View East – Zone C	3,766	Hold Back – Interim Amenity Greenspace
N/A	LAPs, LEAPs and NEAPs – within development zones	4,455	Playspace
	Total:	**54,261**	**= increase of 1,951**

4.16) The above proposals serve to demonstrate that an acceptable strategy can be devised to ensure that there would be appropriate provision of open space on completion of phase 1, ensuring no net loss of open space at any stage of the development in accordance with the AAP policy criteria. A condition requiring the open space strategy to be submitted and approved prior to commencement of phase 1B is considered appropriate to secure this policy objective. The open space shown on the above diagram would remain in place until phase 3 and the completion of the Green Link. The permanent open space would then be designated as such by the Council, in order to ensure it's long term protection.

Extent of actual green and landscape principles
4.17) The table below gives figures for the width of the Green Link in selected parts of the scheme, as well as the extent of hardsurfacing within the green space. These figures are taken from the Design Guidelines, where specific guidance is given, and from the illustrative plans where it is not.

Location	**Width on Parameter Plans**	**Maximum Extent of Hardsurfacing**	**Extent of Actual Green Width**
South of chimney	30 metres	12 metres	18 metres
North of chimney	45 metres	7.5 metres	37.5 metres
South of school plot	35 metres	7 metres	28 metres
Harrow View West plot	35 metres	7 metres	28 metres

4.18) The above figures demonstrate that a significant proportion of the Green Link in each area would be usable, green amenity space and that the areas of hard surfacing (roads, paths etc) should not undermine the overall character of the spaces. The illustrative plans show that the Green Link in the south/south east of the development, adjacent to the proposed retail and community uses would have a greater extent of hard surfacing. However, this is to be expected, as the pedestrian footfall associated with these uses is likely to be higher than in the other, more residential, parts of the scheme. Subject to the incorporation of the provisions for these spaces detailed in the illustrative plans and Design Guidelines into the permission the detailed reserved matters submissions should come forward in a way that preserved these design (and policy) objectives throughout the development.

Public realm and spaces
4.19) The AAP seeks to ensure that the landscape is designed as an integrated green and programmed public realm that is part of the overall urban design, rather than discrete landscaped centres or focal points. The application proposes a series of spaces, including the Community Gateway/Civic Square that would be the main entry point to the development, The Green that would have a community/cultural function and the Headstone Green, which is intended as a natural meadow. The character of each of these spaces is intended to reflect the respective character areas (discussed in more detail below) and the spaces would be connected in a cohesive way by the Green Link. Detailed design considerations for these areas are included in the Design Guidelines, including a brief landscape strategy. The submitted documents demonstrate that a high quality, integrated public realm, consistent with development plan policy aspirations can be delivered throughout the scheme.

Connection
4.20) The proposed Green Link is bisected by the proposed primary route within the Harrow View East portion of the site and by Harrow View. It is important that these links do not have the effect of 'severing' the pedestrian and cycle routes through the Green Link. Harrow View carries a considerable amount of traffic and the Green Link would cross the road to the south of the roundabout (currently under construction), where traffic would merge from two lanes into one. In response to concerns raised by officers, the applicant has submitted a feasibility study for the provision of a pedestrian and cycle crossing in this location, including an indicative design and appropriate traffic modeling. The Council's Highways Engineer is satisfied that a crossing could be provided here in an acceptable form and detailed designs would be the subject of a reserved matters submission. The crossing within the Harrow View

East phase of development can be more easily managed subject to appropriate details, govern the lower volumes of traffic, and the different character of the link, so that the core principles behind the link (ensuring continuity of the green link) can be maintained.

Connections

4.21) In addition to the proposed Green Link, the Parameter Plans propose a network of interconnecting streets, with a clear hierarchy between primary routes, which would provide the main vehicle routes within the site; and secondary routes that would serve as accesses to development blocks and would be laid out in a pedestrian friendly 'home zone' fashion. The Parameter Plans do not seek to fix all the routes that would be part of the final scheme, as additional secondary routes would be provided within some development zones, subject to the Design Guidelines and Development Specification. However, the Parameter Plans set a number of important routes that are intrinsic to the layout of the proposed scheme and the way it links to surrounding areas. These include the primary and secondary route leading from Harrow View West towards Headstone Manor, the secondary routes on Harrow View West connecting the Green Link to Sidney Road and Edward Road (these would not provide vehicular access to the site) and the secondary route on Harrow View East between the Green Link and the Harrow View/Victor Road intersection. It is considered that the submitted Parameter Plans, in conjunction with the Design Guidelines and Development Specification, would ensure that the development complements the surrounding urban grain, in line with AAP objectives. Appropriate limits of "deviation" are incorporated into the plans to enable flexibility with the final detailed scheme/plot design.

4.22) There are a number of changes in levels between the application site and surrounding streets, particularly the boundary between the Harrow View East site and Harrow View, where the site is between 1.2 and 1.8 metres higher than the road, defined by a retaining wall. A row of protected lime trees also occupy this boundary and the site specific objectives set out in the AAP seek to ensure the retention of these trees as part of the development (this is discussed in more detail below in appraisal section 16). Section 3.6 of the Design Guidelines set out how the proposed development would address these site edges, including the provision of minimum building set backs, the creation of a landscaped earth slope and access routes into the site. These guidelines demonstrate that the development would satisfactorily address the site edges and these changing levels.

4.23) As discussed in other appraisal sections, it is important that the proposed development contributes to the regeneration of Wealdstone. In order to achieve this, it is crucial that the existing pedestrian links to the town centre, which are currently in a poor condition, are improved. The applicant has submitted a topic paper, which explains the existing linkage problems between the site and Wealdstone, as well as setting out ideas for possible improvements in this area, including removal of metal barriers, new pedestrian crossings and works to improve the environment underneath the railway bridge. A contribution towards these works is proposed within the S.106. The detailed design would nevertheless need to be developed and delivered by the Council. The retail assessment and economic benefits of the development depend upon a successful pedestrian and cycle link between the site and Wealdstone, to achieve both the "knock on" regenerative and economic benefits promoted for the development and to mitigate the potential adverse effects of the retail floorspace on the site. Subject to these works being carried out, the entry point to the proposed development would have an acceptable connection with Wealdstone.

Character

4.24) The AAP seeks to provide a strong character of new buildings set within a larger green background which goes beyond the buildings, to strengthen the distinct character of

Wealdstone as a town at the edge of the countryside. The AAP seeks to ensure that the scheme is designed as a large neighbourhood of varying character and use, rather than a series of distinct neighbourhoods next to each other.

4.25) It is intended that the buildings in the Harrow View West part of the scheme (Character Zone 1) be influenced by and sensitive to Headstone Manor, given that this part of the development would have the potential to affect the setting of this heritage asset. Design principles in this zone include simple windows in large plain walls, simple and angular massing and a strong contrast of materials. The area denoted as Character Zone 2 would be in the centre of the development of Harrow View East, including the retained chimney and powerhouse. The architectural character of this zone would be influenced by the industrial design of the retained structures, incorporating modern materials. Care would be taken to ensure that there is a transition between this contrasting character and that of the other character zones. Character Zone 3 comprises the extreme south and south eastern part of the scheme and would be influenced by the character of Wealdstone, in particular the civic and urban character of the High Street, with its active ground floor frontage. This would respond to the civic square and surrounding retail, leisure, community and business uses. Detailed guidelines are also included for specific buildings. It is intended that the scheme would be 'tenure blind' throughout.

4.26) Given that this is an outline application and detailed building and public realm designs are not before the Council at this time, it is necessary to consider the extent to which the submitted Design Guidelines would ensure that an acceptable, cohesive design approach is adopted throughout future reserved matters submissions. Officers consider that the detail set out in this document provide an approach that, in conjunction with the Parameter Plans, would ensure that detailed applications should reflect the objectives and aspirations of the AAP and meet the expectations contained within the Core Strategy.

Vitality

4.27) The site specific objectives in the AAP aim to cluster employment and community uses at the south and east of the site, reinforcing a relationship with the Waverley Estate and Wealdstone. The scheme responds to this objective through the provision of a critical mass of mixed activity generating uses in the south east of the scheme (phases 1A and 1C), such as the community centre site, leisure facility, retail, student accommodation and 12,358sqm of employment space. These uses would be arranged around the Civic Square and be directly related to the Green Link with active frontages to these spaces. The footfall that would be created as a result of the activity to be generated from these uses would create a level of activity in this part of the scheme that subject to appropriate detailed design and pedestrian crossing facilities in Headstone Drive should benefit nearby neighbourhood parades and Wealdstone town centre.

4.28) The remaining employment space (23,925sqm) would be located in zones M and L, along the north and north eastern boundary of the site. It is considered appropriate to locate these uses in this part of the site, as the industrial uses can provide a buffer zone between the railway line and proposed residential uses. This would be the principle area of employment space, which would have the potential to accommodate larger employment units and would comprise the consolidated area of SIL following completion of the development. It would be conveniently located for the primary access route to the site and the applicant has demonstrated that pedestrian links to the Waverley Estate could be incorporated into the final design, subject to agreement from the adjoining landowner.

Legacy

4.29) The AAP recognises that the Kodak site has a considerable history as a place of manufacturing. Accordingly, the policy objectives seek to reflect and incorporate the industrial past into the new urban form and identity of the site. .The application proposes to retain the chimney and part of the powerhouse. The powerhouse would be refurbished and converted to a café/community centre, which would sit in the centre of the new Kodak Green public space.

4.30) The retention of these features, in particular the chimney, has been the subject of much debate throughout pre-application discussions and community engagement. Opinion has been divided on this issue and this is reflected in the formal consultation responses to this application. At stage 3 of the public consultation exercise carried out by the applicant, specific questions on the future or otherwise of the chimney were asked of participants. The majority (67%) of respondents thought that the chimney should be retained. The recommendation accordingly seeks to make explicit provision for the long term management and retention of this structure.

Density and Scale

4.31) The submitted Design and Access Statement and Design Guidelines set out the objectives for density across the scheme, whereby higher density residential development would be located in areas of higher public transport accessibility, i.e. in the south eastern part of the site. In the western part of the site, where public transport accessibility is lower, the form of development would be more low scale and suburban in character. The submitted Parameter Plans set out the maximum quantum of residential units within each development zone, along with the maximum floorspace for non-residential uses. This enables the calculation of net residential density across the development zones. The net density across the development zones that include residential is set out in the below table, as well as the maximum buildings heights:

Zone	Max Number of Units	Area (ha)	PTAL	Max Net Residential Density
A	74	1.72	3/4	43
C	129	1.35	3	95
D	66	0.44	3	150
G	153	1.2	2/3	127
H	106	0.7	2	74
J	134	1.22	2	110
N	109	0.53	2	205
Q	59	1.14	2	52
R	65	0.66	2	98
S	62	0.73	2	85
T	128	2.62	2	49

4.32) In terms of density ranges in table 3.2 of the London Plan, the predominant character of the area is considered to be ‘suburban’ (defined as ‘areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys’). Whilst the net residential unit density would appear to be a little high in some of the development zones in relation to the density ranges set out in the London Plan for areas of suburban character, it should be borne in mind that these are maximum figures for each development zone and the actual number of units that would come forward would be likely to

be less (the sum total of the quantum of residential units shown on the Parameter Plans is 1,085, whereas the OPA only seeks permission for 985 units in total).

4.33) In addition, the zones with density levels higher than 95 units per hectare would be located around the central part of the Green Link, where development would generally be between four and six storeys and more akin to the 'urban' character defined in table 3.2 of the London Plan ('areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a district centre or, along main arterial routes'). It is therefore considered that the character of this part of the development would justify higher residential densities in these zones. The more suburban form of development on Harrow View West, of two to three storey dwellings and four storey flats fronting Harrow View, would be within the appropriate density ranges for a suburban area and the application parameters would therefore ensure that future reserved detailed design and layout come forward at appropriate residential densities across the scheme.

4.34) In terms of scale, the application proposes a range of building heights and sizes across the site. The Parameter Plans fix the maximum building heights and numbers of storeys, whilst the submitted Maximum Building Envelope Schedule fixes the maximum footprint of individual buildings. The below table sets out the maximum building height and number of storeys by development zone:

Zone	Uses	Maximum Building Height (m)	Range Of Building Storeys
A	Food store, retail, community, leisure, healthcare, residential, student accommodation	24	3 to 6
B	Employment, retail	24	4 to 6
C	Employment, residential	22	4 to 5
D	Care home, residential	24	4 to 6
E	Employment	20	4
F	Community, retained chimney	65	3 or Chimney
G	Residential	22	3 to 5
H	Senior living, residential	22	4 to 5
J	Employment, residential	22	4 to 5
K	Energy centre, multi-storey car park	24	6
L	Employment	15	3
M	Employment	15	3
N	Residential, retail	20	4
P	School	15	3
Q	Residential	15	3
R	Residential	20	3 to 4
S	Residential	20	3 to 4
T	Residential	15	3

4.35) Whilst much of the Harrow View East site has been cleared of buildings, a number of Kodak's operational buildings and structures occupy the site. These buildings are generally large in terms of footprint and some are up to 37 metres in height. The proposal would result in a greater dispersal of buildings across the site than currently exists, but given the finer

grain of the proposed mixed use development, the building envelopes would generally be smaller and more reflective of the surrounding pattern of development. When comparing the highest existing building on the site (37 metres) and the highest proposed building (24 metres, 6 storeys), there would also be a notable overall reduction in scale when viewed in more distant views from the surrounding area. In that context, the retained chimney is expected to continue to be a distinctive and highly visible landmark.

4.36) As discussed above, the higher density elements of the scheme, which would be up to five and six storeys, would be concentrated along the central parts of the Green Link on Harrow View East, as well as around the proposed Civic Square fronting Headstone Drive and the proposed multi-storey car park in zone K. This is considered to be an acceptable approach, which would result in higher density development largely being concentrated in the centre of the scheme, away from neighbouring lower density housing areas and helping to better define the Green Link and new public open spaces as areas for activity. Other development along Headstone Drive would be up to four storeys, which would be the same as the existing Kodak Reception Building. These buildings, given the previous buildings on the site and the mixed uses, would result in a character that is consistent with this stretch of Headstone Drive and the approach towards Wealdstone and the Harrow view Junction and would be acceptable. Development along Harrow View would generally be up to three storeys in scale, except for small areas of zones H, R and S, which would allow up to four storeys. There are a number of four storey flatted development along Harrow View, so this is considered to be appropriate, subject to careful consideration of site levels relative to the road/footway in specific cases. Other development on the Harrow View West site would be up to three storeys in height, which would relate well to the surrounding suburban housing to the north and south of this part of the site.

4.37) It is noted that the proposed energy centre, to be developed in zone K, would require a stack height of approximately 34 metres, which would be some 10 metres higher than the multi-storey car park structure upon which it would sit. However, it would be sited on the railway (north) side of this structure, which would offset its visual impact – although it would be visible from residential homes and from some streets to the east of the railway line in Wealdstone. Officers consider that this separation, together with the context provided by the paraphernalia (overhead lines, signals etc) from the railway line means that the visual impact of such a structure would be acceptable. It is therefore considered that this element of the proposal would have an acceptable visual impact, subject to consideration of detailed designs at reserved matters stage.

4.38) The site falls within the panoramic view of Harrow and Central London from Old Redding, as set out in Schedule 4 of the UDP and any proposed development could affect the view of St Mary's Church from the Courtenay Avenue railway bridge. The view from the Old Redding car park is publicly accessible and shows the topography of the Borough and key landmarks, including Harrow on the Hill Area of Special Character. It is recommended for retention as a 'protected view' in the Council's Draft Harrow Views Assessment (2012).

4.39) The changes to the landscape panorama associated with the form of development outlined would not, officers consider, erode the fundamental qualities of these views. The scale and development typologies would instead reflect the sites strategic location, within the Heart of Harrow AAP area, but also close to Headstone Manor and the suburban housing areas that surround it. The proposed development would result in a general reduction in scale of buildings, which officers consider would have a positive impact on locally important views and, consequentially, the setting of Harrow on the Hill and St Mary's Church. Aside from the treatment of the existing chimney, and proposed chimney to the energy centre,

officers expect the development to play a positive role within the wider urban panorama.

Phasing and Flexibility

4.40) As discussed above in appraisal section 2, the first phase of development would provide hotdesking, business incubation, serviced offices and small scale self-contained units for SMEs. This would be provided in a series of buildings that would be grouped around the Civic Square/Community Gateway, along with other activity-generating uses such as the food store, retail/restaurants, community and health centres. Further employment space would be delivered in zones L and M, within phases 2 and 3 of the development and would form a consolidated area of SIL land, albeit with a slightly different offer than the adjacent Waverley Industrial Estate. These two distinct areas of employment use would be appropriate and, as discussed above in appraisal section 2, the application has the flexibility to accommodate a range of unit types to accommodate different businesses, in accordance with AAP requirements.

Conclusion

4.41) Having regard to the requirements of the NPPF, the London Plan and local policy in the form of saved UDP policies, the recently adopted Core Strategy and site specific AAP objectives, it is considered that the design response set out in the Parameter Plans and Design Guidelines, and supported by the Design and Access Statement and other submitted documents, is acceptable. The development would deliver a number of the emerging AAP objectives, such as the re-provision of useable open space, the delivery of a strong character of new buildings, the retention of a legacy for Kodak and the creation of new vistas to Headstone Manor. Subject to consideration of detailed reserved matters applications, the proposed development is capable of successfully integrating with surrounding areas, whilst creating a unique character of its own. The scheme would reinforce the positive aspects of local distinctiveness, whilst enabling the promotion of designs that would improve the area and the way it functions, in line with NPPF and development plan.

5) MITIGATION FOR LOSS OF OPEN SPACE, LEISURE AND SPORTS PROVISION AND IMPACT ON HEALTH AND WELLBEING

5.1) The Harrow View West site includes approximately 4.3 hectares of playing fields, which comprised part of the former Zoom Leisure private sports facility (total area approximately 7.9 hectares, including car parking). An indoor leisure facility also occupies the site, alongside associated car parking. A breakdown of the former sports facilities on the site is set out in the below table.

Outdoor sports pitches (plus associated changing facilities)

3 adult football 1 mini soccer 7 tennis courts 2 bowling greens
Indoor facilities
1 x 4 badminton court sized sports hall 1 x 150 station health and fitness suite

5.2) This part of the site would be redeveloped for housing as part of the proposal, comprising phase 1C. Whilst some of the open space (23,925sqm) would be re-provided on Harrow View West (discussed above in appraisal section 4), this would be in the form of an urban park/green corridor, not in the form of replacement sports facilities.

5.3) The NPPF states that 'existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by the equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

5.4) Core Strategy policy CS1 states that 'the reconfiguration of existing open space may be permitted where qualitative improvements and/or improved access can be secured without reducing the quantity of the open space'. Policy AAP11 of the emerging AAP requires all major residential developments in the Intensification Area to contribute to the quality and/or carrying capacity of outdoor sports pitches, as well as providing further guidance on the reconfiguration of open space.

5.5) The applicant has submitted a Sports Facilities and Open Space Needs Analysis in support of the application. A supplementary report has also been submitted since the publication of the Council's draft Outdoor Sports Strategy. These reports outline the existing situation in the Borough, provide an assessment of the need for sports facilities and open space, as well as providing a list of proposals to mitigate the loss of the sports facilities at the former Zoom Leisure facility.

5.6) The Council has also commissioned an Open Space Study (OSS), which was completed in 2011 and forms part of the evidence base to the LDF. This document undertakes an audit of open space, sport and recreation provision, provides information about existing needs and aspirations and sets standards for future provision. The findings of this document, as well as the proposed mitigation measures, are summarised in the below sections insofar as they relate to these proposals.

5.7) An Outdoor Sports Strategy has been commissioned by the Council. This is intended to follow on from the OSS and provide a strategy for delivery of outdoor sports facilities having regard to existing needs and demand for future provision. This is currently in draft form and is yet to be finalised, but does set out some strategic objectives in relation to playing pitches, which are discussed later in this section. In addition to a number of concerns raised by local residents in relation to the loss of playing fields, an objection has been received from Sport England, who object in principle, in the absence of the full publication of the Council's Outdoor Sports Strategy.

Outdoor Sports Pitches

5.8) Applying Sport England's Playing Pitch Model (PPM) to supply and demand, there is a notional surplus of 5.5 adult football pitches across the Borough, so the loss of 3 pitches from the Zoom Leisure site would reduce this surplus to 2.5, but given the current use made of adult pitches for junior and mini-soccer, this reduction would add to the pressures on remaining pitches. The loss of the mini-soccer pitch would exacerbate an existing deficit of 8 pitches. The OSS however concludes that the main contributory factor to shortfalls in pitch provision in Harrow is their poor quality, with 56.2% of football pitches in the Borough being compromised in terms of their carrying capacity.

5.9) In order to mitigate the loss of the 3 adult football and 1 mini soccer pitch from the application site, the applicant's report recommends carrying out quantitative and qualitative improvements to pitches and changing facilities at Bannister Sports Ground and Headstone Manor Recreation Ground. This proposal reflects an ongoing engagement with the Council's leisure services on a strategy for alternative pitch provision. The existing former Zoom Leisure facility is currently the home base for Kodak Utd FC, who continue to play from the site despite the closure of Zoom Leisure and associated facilities, through sponsorship from the applicant. Kodak Utd accommodates eight home matches per week at the site and this demand would need to be accommodated elsewhere in the Borough to mitigate the loss of these pitches. Barnet Municipal and Harrow Lyons also play home games at the site through arrangements with Kodak Utd FC. The 3 existing adult pitches are all rated in the OSS as either 'average' or 'good' quality and as such count as 3 pitches for the purposes of calculating pitch carrying capacity. The mini soccer pitch is rated as 'below average' quality, which compromises its usage to the extent that it essentially counts as half a pitch for the purposes of calculating carrying capacity.

Bannister Sports Centre

5.10) The Bannister Sports Centre is just over a mile from the application site and currently has 2 adult football, 2 junior football, 1 mini soccer and 2 adult rugby pitches (shown in purple on the below diagram), as well as a synthetic athletics track. The eastern part of the site has a pronounced gradient that compromises pitch provision, whilst the western part suffers from poor drainage, which reduces carrying capacity.

5.11) One of the adult football pitches, one of the junior football pitches and the mini soccer pitch are of 'below average' standard, which means that each of these pitches count as half a pitch for the purposes of calculating carrying capacity. The remaining football pitches are of 'average' quality and therefore count as one pitch (average pitches can accommodate the equivalent of one match and one training session per week). Both rugby pitches are rated as 'good quality', but only one is used by local clubs/schools. The pitches are served by changing facilities comprising four team changing rooms, a large open plan changing area and a clubroom. There is on site parking for approximately 60 cars.

5.12) The main football club user at present is Pinner Jewish FC (PJFC), which comprises 2 adult, 6 junior and 2 mini soccer teams. The club requires 4 adult/junior pitches and 1 mini soccer pitch to meet its competitive and training needs, with midweek training sessions taking place on artificial pitches at The Hive and Fairfield Academy. Pitch usage at Bannister Sports Centre in a typical week during football/rugby season is set out in the below table:

Day	Adult Football 1	Adult Football 2	Junior Football	Junior Football	Mini Soccer	Rugby 1	Rugby 2
Mon	-	-	-	-	-	Salvatorians	-
Tues	-	-	-	-	-	Salvatorians	-
Wed	-	-	-	-	-	Salvatorians	-
Thurs	-	-	-	-	-	Salvatorians	-
Fri	-	-	-	-	-	Salvatorians	-

Sat (am)	-	-	-	-	PJFC U9s	-	-
Sat (pm)	PJFC 1sts	-	-	-	-	-	-
Sun (am)	-	-	-	PJFC U11s	-	-	-
Sun (pm)	PJFC U16s	PJFC U15s	PJFC U13s	-	-	-	-

Changing room usage at Bannister Sports Centre in a typical week during football/rugby season is set out in the below table:

Day	Team Change 1	Team Change 2	Team Change 3	Team Change 4	Group Change
Mon	-	-	-	-	Salvatorians
Tues	-	-	-	-	Salvatorians
Weds	-	-	-	-	Salvatorians
Thurs	-	-	-	-	Salvatorians
Fri	-	-	-	-	Salvatorians
Sat (am)	PJFC U9s	Opponents	-	-	-
Sat (pm)	PJFC 1sts	Opponents	-	-	-
Sun (am)	PJFC U11s	Opponents	-	-	-
Sun (pm)	PJFC U16s	Opponents	PJFC U15s	Opponents	PJFC U13s

5.13) The applicants propose to provide resources to the Council (as operator of Bannister) through the S106 that would enable the creation of additional pitches and pitch capacity at Bannister Sports Centre, to enable Kodak Utd FC (KFC), Barnet Municipal FC (BMFC) and Harrow Lyons FC (HLFC) to relocate to the site. The numbered red outlines on the above diagram show how additional pitches *could* be accommodated within the site, providing 2 new adult football pitches and 1 new mini soccer pitch, whilst converting the unused rugby pitch to an adult football pitch (thereby accommodating the lost pitches from Zoom Leisure). This is nevertheless an indicative layout and the final design would be developed by the Council in consultation with relevant stakeholders, including local residents and existing users of the site. In order to accommodate the revised layout, much of the site would need to be re-contoured, as current gradients cannot adequately accommodate pitches. The pitches in the western part of the site that currently suffer from poor drainage would need to have pipe drains with sand groove systems installed, which would double their carrying capacity. The table below therefore demonstrates how the improvements could replace the 3 adult football and 1 mini soccer pitch lost from the application site, as well as increasing the collective carrying capacity of the pitches from 16.5 hours per week at present to 27 hours per week. This would represent a significant qualitative improvement.

Pitch Type	**Existing Capacity**	**Future Capacity**	**Total Net Gain**

	(hours per week)	(hours per week)	(hours per week)
Adult football	4.5	12.0	7.5
Junior football	1.5	3.0	1.5
Mini-soccer	4.5	9.0	4.5
Rugby	6.0	3.0	-3.0
Total	**16.5 hours**	**27 hours**	**10.5 hours**

5.14) The proposals also illustrate how alterations to the changing rooms could be carried out to convert the large open plan changing rooms into four further team changing rooms for dedicated use during the football season by Kodak FC. This would involve the provision of lockers in the changing rooms which, along with staggered kick-off times, would enable more than one team of the same age group and gender to use the changing space on an overlapping basis. During the athletics season, the changing rooms would revert to female changing for users of the track. Car parking might also be expanded to meet Sport England's recommended car parking standards, which would require a further 44 spaces.

Pitch usage at Bannister following relocation of the teams displaced by development of the application site would be:

Day	Adult Football 1	Adult Football 2	Junior Football 1	Junior Football 2	Junior Football 3	Junior 9v9	Mini Soccer 1	Mini Soccer 2	Rugby
Mon	-	-	-	-	-	-	-	-	Salv
Tues	-	-	-	-	-	-	-	-	Salv
Weds	-	-	-	-	-	-	-	-	Salv
Thurs	-	-	-	-	-	-	-	-	Salv
Fri	-	-	-	-	-	-	-	-	Salv
Sat (am)	-	-	-	-	-	-	PJFC U9	KFC U9	-
Sat (pm)	PJFC 1sts	KFC 1sts	-	-	KFC Girls	KFC U11A	-	-	-
Sun (am)	BMFC	KFC 2nds	KFC U14B	KFC U13A	-	PJFC U11	KFC U10	-	-
Sun (pm)	PJFC U16s	PJFC U16s	KFC U16s	KFC U15A	PJFC U13s	KFC U12B	-	-	-

5.15) The adult football pitches would be used for three games per week and the junior pitches for two or three games. According to Sport England's 'Natural Turf for Sport' Design Guidance (2011), pitches with pipe drain and sand grooved systems are capable of accommodating up to six hours of adult use per week (equivalent to four matches) and up to twelve hours of use by players aged under 15 (equivalent to eight matches). The pitches would therefore be capable of accommodating the volumes of use, provided the appropriate improvements are carried out.

Changing facilities at Bannister following relocation could be shared as follows, assuming that Kodak FC would have exclusive use of changing rooms 5 to 8 at all times:

Day	Change 1	Change 2	Change 3	Change 4	Change 5	Change 6	Change 7	Change 8
Mon	School	School	-	-	-	-	-	-

Tues	School	School	-	-	-	-	-	-
Wed	School	School	-	-	-	-	-	-
Thurs	School	School	-	-	-	-	-	-
Fri	School	School	-	-	-	-	-	-
Sat (am)	-	-	PJFC U9s	Opponents	-	-	KFC U9s	Opponents
Sat (pm)	PJFC 1sts	Opponents	KFC 1sts	Opponents	KFC U11A	Opponents	KFC Girls	Opponents
Sun (am)	BMFC KFC 2nds	Opponents Opponents	PJFC U11s	Opponents	KFC U10s	Opponents	KFC U14B KFC U13A	Opponents Opponents
Sun (pm)	PJFC U13s	Opponents	PJFC U16s PJFC U15s	Opponents Opponents	KFC U16s KFC U15A	Opponents Opponents	KFC U12B	Opponents

5.16) The above changing room arrangements would enable Kodak FC to be accommodated at Bannister. It would also be necessary to increase parking provision on the site to accommodate the increase in users. Based on Sport England's recommended standard of 0.67 spaces per user, this creates a requirement for 104 parking spaces. There are currently 60 on the site, so a further 44 would be required. The site is located in the green belt and careful consideration would accordingly be required for all physical changes to the site itself. Nevertheless, it is considered that these additional spaces could be accommodated within the site (subject to a separate planning application).

5.17) In summary, the scope for improvements at Bannister would meet an objective of the draft Outdoor Sports Strategy, by replacing the 3 adult football and 1 mini-soccer pitch lost at Harrow View, with 3 junior football pitches and 1 mini-soccer pitch. The effect would be to create a 'hub' site, by improving provision to create the 'well-drained, 'true' playing surfaces and changing facilities' sought by the Strategy. These improvements could increase the collective carrying capacity of the pitches from 16.5 hours per week at present to 27 hours per week in the future. They would also ensure that pitches and changing facilities could accommodate the needs of Kodak FC, Barnet Municipal FC and Harrow Lyons FC, without compromising the needs of Pinner Jewish FC.

5.18) The GLA have raised concerns over the loss of a rugby pitch, on the basis that only six dedicated rugby pitches would remain in the borough. Only one of the rugby pitches is used regularly, by Salvatorians School for curricular purposes. The Outdoor Sports Strategy notes that 'the Bannister [rugby] pitches are not used by community rugby clubs and have therefore been excluded from the [Playing Pitch Model] calculations'. This recognises the lack of demand for these pitches for rugby. All three local rugby clubs own their own grounds and haven't identified any shortfalls in provision and it is therefore considered that the loss of one rugby pitch at Bannister would be acceptable.

Headstone Manor Recreation Ground

5.19) Headstone Manor Rec is adjacent to the western boundary of the Harrow View West site and therefore serves a similar catchment area. It currently provides 4 adult football, 4 junior football, 5 mini soccer and 3 cricket pitches, as shown in purple on the below diagram. Two of the adult football pitches and three of the mini soccer pitches are of 'below average' standard, thereby counting as only half a pitch, whereas the remaining pitches are of 'average' quality and count as one pitch. The pitches at the site are used by Headstone Manor Youth FC (with a membership of 350 boys and girls, fielding 20 teams and sharing a clubhouse with Bessborough Cricket Club), Pinner Albion (fields 6 teams and has its own

clubhouse), Bessborough Cricket Club (fields 4 adult and 1 colts team) and West Harrow Cricket Club (fields 3 adult and 4 colts teams and has a clubhouse at the west end of the site).

5.20) The applicants submission set out how through S.106 payments arising from the development improvements to the quality and carrying capacity of all pitches at Headstone Manor, by relocating and upgrading the mini soccer pitches (as shown on the above diagram) to accommodate a reed bed drainage scheme, installing pipe drains with sand groove systems to pitches and improving/extending changing accommodation could be achieved. There would be no loss or gain of pitches on the site in terms of quantum, but the collective carrying capacity of the mini-soccer pitches would increase from 7 hours per week at present to 25 hours per week.

Applications response to Draft Outdoor Sports Strategy

5.21) The Council's draft Outdoor Sports Strategy sets out a number of strategic objectives, many of which are relevant to these proposals. Objective No.1 is 'to safeguard existing playing fields and outdoor sports provision from development'. This objective is similar to that of the NPPF, as it aims to ensure that playing pitches are not developed unless pitches of equivalent or better quantity and quality are provided in a suitable location. Objective No.2 is 'to meet shortfalls in the provision of junior football pitches in part through the development of additional sports pitch provision and in part by converting existing pitches of types that are assessed to be surplus to current demand (senior football) into those types for which there is a deficit (junior football and in future 9v9 pitches)'. Other objectives are also relevant, including the creation of a local standard for pitch provision and ensuring that changing accommodation meets a minimum quality standard.

5.22) The applicant proposes a financial contribution to enable improvements at two strategic, publicly accessible sports facilities in the local area, Bannister Sports Ground and Headstone Manor Recreation Ground, operated by the Council. The proposals would ensure that there would be no net loss of playing pitches and that the carrying capacity of pitches would increase at these two sites. Poor quality pitches are identified in the Strategy as representing a considerable challenge throughout the Borough and improving pitch quality (and therefore usage capacity) at pitches replacing those at the former Zoom Leisure facility would create a net gain in capacity and would result in both a quantitative and qualitative improvement to Council facilities. The Strategy contains an objective to convert adult pitches to junior pitches and therefore replacing the adult pitches from the application site with junior pitches at Bannister could contribute to this. It is also possible for one of the new junior pitches to be marked out as a 9v9 pitch. The concept of a hierarchy of pitch provision mentioned in the Strategy offers the opportunity to develop a 'secondary hub' site (or sites), by improving provision to create the 'well-drained 'true' playing surfaces and changing facilities' specified in the Strategy.

5.23) Accordingly, whilst acknowledging the redevelopment of the existing sports pitches within the site, the proposals, developed in concert with the Councils emerging Outdoor Sports Strategy, is considered to provide, through S.106 contributions and the evidence submitted with the application, a credible alternative to existing provision which officers consider would not harm the deliver of outdoor sports in the borough. Whilst recognising that it is for the Council, in concert with local stakeholders to deliver any improvements to the above sites, the proposed S.106 contributions, are considered to amount to appropriate mitigation for the loss of on site pitches.

5.24) Sport England's objection to the proposals on the basis of the uncertainty associated with the delivery of replacement facilities is not a matter that can be addressed by the applicant. Equally, the extent to which the principle contained within the application, offends Sport England's policy will need to be balanced, alongside all other policy objectives, in the final consideration of the application. Officers nevertheless consider that the proposal would comply with paragraph 74 of the NPPF as the loss of pitches resulting from the proposed development would be replaced by equivalent (in terms of quantity) and better (in terms of quality) provision at two suitable, strategic, publicly accessible sites in the locality. The proposed mitigation is also considered to be consistent with London Plan policy 3.19, which states that 'development proposals that increase or enhance the provision of sports and recreation facilities will be supported'.

<u>Sports and Leisure Facilities</u>

5.25) Alongside its sports pitches, the former Zoom Leisure facility comprised a 4 badminton court sized sports hall and a 150 station health and fitness suite, which would be lost as a result of the development. There are also 7 tennis courts and 4 bowling greens on the site.

Sports Hall

5.26) In 2009, the Council prepared a 'Provision for Sports Halls Report', based upon the results of Sport England's Facilities Planning Model (FPM), which assessed the balance between supply and demand for sports halls in the Borough, as well as neighbouring Boroughs, in 2008 and 2018. In terms of the then (2008) provision, sports halls in the Borough (including Zoom Leisure) could accommodate 6,754 visits per week, whereas the local demand is for 10,270 visits per week. This suggests that at present only around 65% of overall demand for sports halls can be accommodated by facilities in the Borough. However, an additional 2,200 visits per week by Harrow residents are accommodated by sports halls in neighbouring Boroughs, leaving a revised figure for unmet demand of 1,318 visits per week,

which is equivalent to a six-badminton court sized sports hall. Accessibility to sports halls is judged to be very good, with only 11% of the Borough's population beyond the catchment of at least two sports halls. Projected future sports hall provision and demand in 2018 (which assumed that the Zoom Leisure facility would continue to be available) leaves a figure for unmet demand of 1,253 visits per week, again equivalent to a six-badminton court sized sports hall. Therefore, based upon the assessment by the FPM, there is a current and future assessed deficiency in sports hall provision in Harrow, equivalent to one large facility. The loss of Zoom Leisure would exacerbate this by the equivalent of four further badminton courts.

5.27) The proposed mitigation measure in this instance is a financial contribution towards upgrading Harrow Leisure Centre (HLC), in addition to a Multi Use Games Area (MUGA) to be provided as part of the primary school development. HLC is a strategic site in the AAP. The AAP proposes the re-provision or refurbishment of the leisure and recreational uses on the existing site alongside some new, enabling, residential development and a car park. It is too early to determine the outcome of any proposals to redevelop or refurbish the existing facilities at Harrow Leisure Centre. That is a matter for the Council, based upon priorities for sport and leisure that it sees at that time. It is nevertheless considered that a proportionate contribution towards improved facilities at HLC (as part of a future redevelopment/refurbishment) would be more appropriate than a like-for-like re-provision of a private facility on the application site, given the doubts around financial sustainability of such facilities and the risk of competition between such facilities that may compromise the long term sustainability of both sites.

Health and Fitness

5.28) The current provision of 778 stations in the Borough (not including the Zoom Leisure facility), equates to 2.83 per 1,000 people. On the basis of a forecast population increase of 8,330, coupled with the current per capita levels of provision, there would be a need for an additional 23.6 fitness stations by 2026. Current per capita levels of provision are below the average for London and England. However, the Fitness Industry Association's target suggests a surplus of 165 stations based on 2026 demand, meaning that the existing provision could meet future demand. Notwithstanding this, a 1,155sqm private leisure facility is proposed in zone A of the development, which would provide adequate compensation for the loss of the Zoom Leisure health and fitness suite.

Tennis Courts

5.29) There are 114 tennis courts on 24 sites in Harrow, which includes the 7 courts at Zoom Leisure (assessed as being 'low quality'), and this equates to one court per 1,936 people. Accessibility is generally good, with most people living within a 15 minute walk of their nearest court. On the basis of a population increase of 8,330, coupled with current per capita levels of provision, there would be a need for an additional 4.3 tennis courts by 2026. There is no dedicated quantitative standard for tennis courts in the Council's Open Space, Sport and Recreation Study or Outdoor Sports Strategy, which makes an objective assessment of existing provision difficult to make. However, data from Sport England's 'Active People' survey, suggests that demand in the Borough is likely to be below the national average.

5.30) The Council's Draft Outdoor Sports Strategy suggests that the best quality tennis courts are situated in private clubs, which are spread across the Borough. A total of 28 courts are located on Council sites, 6 on the adjacent Headstone Manor Recreation Ground (good/average quality) and 4 at Harrow Recreation Ground (excellent/good quality), some 1,050 metres to the south of the Harrow View West site. Other private facilities are also located within 15 minutes walk of the site, at Headstone LTC (5 courts, excellent/good

quality) and North Harrow TC (3 courts, good quality). The applicant also proposes a MUGA within the curtilage of the primary school, which would be floodlit, would provide a better quality surface than the existing tennis courts and would provide greater flexibility to accommodate other activities, such as netball and basketball.

5.31) On this basis, it is considered that an adequate provision of public and private courts exists within the catchment area of the proposed development and the loss of the 7 private courts at the former Zoom Leisure facility can be accepted. A S.106 obligation is included above to ensure that the MUGA is publicly accessible.

Bowling Greens
5.32) Following the recent closure of Zoom Leisure, which accommodated Kodak Bowls Club, there are 8 bowling greens remaining in the Borough, each of which accommodates a bowls club and many of these are Council-owned. As with tennis courts, the Council's Open Space, Sport and Recreation Study and Outdoor Sports Strategy do not include a dedicated quantitative standard for bowling greens, although Sport England's Active People survey suggests that the proportion of adults playing bowls in Harrow is well below the national average and the demise of Kodak Bowls Club before the closure of Zoom Leisure suggests that demand is falling. The bowls greens at Harrow Recreation Ground and Byron Park are within 15 minutes walk of the application site and there is no evidence that these clubs are over-subscribed. It is therefore considered that the loss of the bowling greens on the application site would not unduly affect the local supply-demand balance and adequate provision would remain in the local area.

Open Space
5.33) As discussed above, the completed development would result in a net increase in the provision of usable open space across the site, following the completion of the Green Link and associated spaces to be created within it. An interim Open Space Strategy, outlined above, would also ensure that adequate temporary provision is made at the end of the first phase, to ensure that there would not be a shortfall at any point during the course of this 10 year phased scheme to meet the Core Strategy policy requirements.

5.34) It is also important to consider whether the type of open space to be provided would adequately satisfy a local need, as identified in the Council's Open Space, Sport and Recreation Study and having regard to AAP objectives. The Open Space, Sport and Recreation Study identifies a justification for the provision of amenity greenspace (landscaped areas providing visual amenity and informal activity), natural or semi-natural greenspace (areas with residual natural habitats including woodland and wetland) and future allotment provision. The site specific objectives in the AAP seek the creation of small and pocket parks as part of the development.

5.35) The particular shortfall identified is for natural or semi-natural greenspace and the application responds to this through the creation of the 'Headstone Green' space, immediately to the east of Headstone Manor Recreation Ground, which is intended as wildflower meadow with biodiversity and wetland features, all of which are identified in the local Biodiversity Action Plan as being desired habitats. The remainder of the Green Link would provide usable amenity greenspace that is intended as a continuous park environment, as well as a series of public spaces. The Parameter Plans would also allow for the provision of allotments within the development zones and these are shown on the illustrative plans.

5.36) In summary, it is considered that the typology of open space to be created would

contribute to meeting identified shortfalls in this sub-area and to the objectives of the AAP, including policy AAP12 that seeks to improve access to nature within the Intensification Area. The publicly accessible spaces would not be adopted by the Council, but instead would be the subject of a Management Plan to be secured by condition.

Children's Play Space

5.37) London Plan policy 3.6 requires development proposals that include housing to make provision for play and informal recreation, based on the expected child population of the scheme and an assessment of future needs and this is re-inforced by policy AAP11 and Core Strategy policy CS1. The Mayor's SPG 'Providing for Children and Young People's Play and Informal Recreation' contains more detailed guidance, including a benchmark of 10sqm of usable playspace per child. The Council's Open Space, Sport and Recreation Study also identifies a need for 1 play area catering for under-11s and 1 for children between 12-16, to meet an existing shortfall in the local area.

Local Play Areas (LAPs) in zones C, G, H, N, Q, R, S and T (225sqm each, 11 in total) Small landscaped areas of open space for children under 6, to be 5 minutes walking distance from home	2,475sqm total
Locally Equipped Play Areas (LEAPs) in zones D, P, Q and T (485sqm each, 5 in total) Unsupervised play area for early school age children (4-12 years) with formal play equipment, within 10 minutes walk of home	2,425sqm total
Neighbourhood Equipped Play Areas (NEAPs) in zones J and R (850sqm each, 2 in total) To serve a substantial development including children with special needs, to include meeting areas. Play equipment targeted at those aged between 4-14 and to be within 15 minutes walk of home	1,700sqm total

5.38) The above table sets out the type of play areas, the zone in which they would be located and the size of each play area and total areas for each type. These are set by the Parameter Plans, Design Guidelines and Development Specification to be provided within each of the development zones. The total play area provision would therefore amount to some 6,600sqm, which is far in excess of the standard set out in the Mayor's SPG and would therefore meet the expected and future needs of the development, as well as contributing towards meeting an identified local shortfall.

5.39) Detailed designs of the play spaces are not before the Council at this time, although the Design Guidelines provide adequate explanation as to the definition of each type of play space, which would ensure that future reserved matters submissions include adequate detail. The application documents demonstrate that the play areas would be distributed across the scheme in an acceptable manner in relation to walking distances and would be public facing. It is therefore considered that the proposal complies with London Plan and Core Strategy/AAP policy on children's playspace.

6) RESIDENTIAL AMENITY AND NOISE

Amenities of Neighbouring Occupiers

6.1) The larger buildings within the proposed development (i.e. those over three storeys in height) would be sited away from the boundaries of neighbouring residential properties. The residential development on Harrow View West would not be higher than three storeys, except facing Harrow View itself which could be up to four storeys, and the submitted

illustrative masterplan and Design Guidelines (DG) indicate that an acceptable arrangement could be devised within the submitted parameters. It is therefore considered that, subject to detailed consideration of the layout of dwellings on this part of the site, the proposed development would not be overbearing to the occupiers of neighbouring dwellings adjacent to the Harrow View West site, nor would the buildings result in unacceptable loss of light or outlook. Acceptable distances and fenestration arrangements could be devised to ensure that the proposed dwellings would not overlook neighbouring properties.

6.2) With regards to the development of Harrow View East, it is noted that the only residential properties that directly abut the site are those on Harrow View, Pinner Park Gardens (including those under construction) and Mulberry Place to the north and Goodstone Court in the south west corner of the site (currently under construction). The employment buildings in Zones L and M to the north of site would be limited to three storeys and the DG requires a landscape buffer between them and the residential properties. This in conjunction with the change in levels between the site and these properties would ensure an acceptable arrangement. It is also noted that larger buildings forming part of Kodak's operations (up to 19 metres in height) used to occupy this part of the site. In relation to Goodstone Court, the dwellings to the north would be three storeys and the illustrative masterplan demonstrates that an acceptable arrangement could be devised. The four storey Kodak Reception Building to the east of this property would be retained and refurbished for a similar use and this would therefore not have a greater impact than the current situation. It is therefore considered that, subject to detailed consideration of the layout of dwellings on the Harrow View East part of the site at reserved matter stage, the proposed development would not be overbearing to the occupiers of neighbouring dwellings adjacent to the site, nor would the buildings result in unacceptable loss of light or outlook. Again, acceptable distances and fenestration arrangements could be devised to ensure that the proposed dwellings would not overlook neighbouring properties.

6.3) The proposed development would not unduly impact on the amenities of the occupiers of any other neighbouring residential properties in the vicinity due to separation distances and intervening features such as roads and the railway line. The proposal would therefore ensure that an acceptable impact on the amenities of neighbouring residential occupiers would be provided, in accordance with the requirements of saved UDP policy D5 and the Residential Design Guide SPD. In making this assessment, regard has been had to the submitted Daylight Sunlight document, although officers expect more detailed iterations of this work to come forward at reserved matters stage.

Living Conditions of Future Occupiers

6.4) As the proposal is submitted in outline, no detailed layout plans of the proposed residential buildings have been submitted. There are however illustrative plans and details in the DG in relation to housing layout and typologies, which give an indication of how the site could be developed. On the basis of the information provided, officers are satisfied that the proposed houses and flats could be designed to comply with the space standards set out in the London Housing Design Guide and the Residential Design Guide SPD. Acceptable external amenity space could also be provided and, subject to further consideration of this issue at reserved matters stage, the proposal is considered to be acceptable in this regard.

Noise and Air Quality

6.5) Detailed consideration of the impact of the development on noise and vibration and air quality is undertaken in appraisal section 11, below.

Court Functions

6.6) An objection has been received on behalf of the adjacent Crown Court building, which raises concerns over the impact on Court operations, height and massing, highway and noise issues. In terms of height and massing, it is acknowledged that the Parameter Plans allow for six storey buildings to be sited close to the west elevation of the Court building, however it is considered that this would not be excessive in height. The possible six storey building would also be sited some 22 metres from the nearest part of the Court building and would not extend along the whole of the site boundary. Given the relationship between the Court building and the proposed development, loss of sunlight is likely to take place only later in the day – when the sun tracks to the west of the court building. It is therefore considered that subject to thoughtful and considered design, the development on this part of the site would not automatically lead to unacceptable overshadowing of the adjacent Court building or otherwise compromise daylight levels to the rooms within that building lit from windows on the west and north elevations.

6.7) Other objections relate principally to the functioning of the Court, including:

- a request to limit deliveries to retail uses to outside of Court operating hours (9.30am to 5.30pm Monday to Friday);
- impact of demolition works in terms of noise; and
- high noise levels during construction.

6.8) In relation to the impact of deliveries to the proposed retail uses, it is unclear how these would impact on the Court building, as the servicing areas and service vehicle routes would be located some 80 metres from the Court. Officers therefore consider it unnecessary to limit hours of delivery, particularly given the hours suggested by the objector would lead to evening/early morning deliveries that might conflict with the residential uses in closer proximity to the service areas during hours when ambient noise levels are lower. It is unclear how, subject to appropriate control, the demolition works would unduly impact on the Court, given that the part of the site adjacent to the Court has already been cleared, but it is considered that the full Construction Environmental Management Plan, required by condition and discussed in more detail above and in later appraisal sections, would ensure that the future demolition and construction works would not unduly impact on Court functions in terms of noise and/or vibration. It is noted that pedestrian footfall could increase in the vicinity of the Court, but it is considered that this would not unduly impact on the vehicular access to the Court from Headstone Drive.

7) TRAFFIC, PARKING, ACCESS, SERVICING AND SUSTAINABLE TRANSPORT

7.1) London Plan policy 6.3 states that 'development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed'. Policies 6.9 and 6.10 relate to the provision of cycle and pedestrian friendly environments, whilst policy 6.13 relates to parking standards. Core Strategy policy CS1Q seeks to 'secure enhancements to the capacity, accessibility and environmental quality of the transport network', whilst policy CS1R reinforces the aims of London Plan policy 6.13, which aims to contribute to modal shift through the application of parking standards and implementation of a Travel Plan. These aims are also reflected in policy AAP19.

7.2) The applicant has submitted a Transport Assessment with the application and, following comments from the Council's Highways Authority and TfL, a further Transport Assessment Addendum and Car Park Management Plan has been submitted for consideration. The Council and TfL have also undertaken traffic modelling as part of a wider exploration of traffic generation and its potential mitigation, associated with the Area Action Plan.

Traffic Generation/Site Access Provisions

7.3) A London database of trip generation for different land uses (TRAVL) has been applied by the applicant and the combination of the highest level of trips have been chosen to illustrate the maximum impact on the local road network.

7.4) In order to establish a baseline for the existing B1 office use it has been accepted that Kodak has declined in operation and large areas of the site have been cleared of buildings over the past decade. The gross floor area (GFA) has consequently reduced as a result. On this basis these reduced floor areas have been used in conjunction with vehicle trip rates in order to determine a representative level of traffic movements – reflecting the latent site development capacity and current and recent levels of trips from employees and visitors to the site. It is estimated that since 2005 a steady and significant decline in operations followed so the baseline is estimated for that period.

For that year it is estimated that the 2005 peak 2-way flows are as follows:-

Table A:-

Land Use Office/Light Industrial	**AM**	**PM**	**Saturday (mid-day)**
Total	800 vph	1500 vph	1500 vph

7.5) These movements are distributed on a theoretical basis by way of available parking provisions in 2005. The Harrow View West and East elements contained 811/461 spaces respectively at that time hence it has been assumed that a 64%/36% trip generation split would have resulted onto the existing Harrow View and Headstone Drive vehicular access locations respectively.

Using these figures, the estimated 2005 peak 2-way trip generation figures are as follows:-

Trip Generation	**AM**	**PM**	**Saturday (mid-day)**

Harrow View	512 vph	960 vph	960 vph
Headstone Drive	288 vph	540 vph	540 vph

7.6) For all the combined A1 (retail), A3 –A5 (retail), B1/B2/B8 (Business /General Industrial/ Storage Distribution), C2- Residential Institutions, C3- Residential, D1- Non residential institutions, D2- Assembly and Leisure uses, the traffic model developed suggests a total peak 2-way trip generation as follows:-

All proposed land uses	**AM**	**PM**	**Saturday (mid-day)**
Total	950 vph	1100 vph	690 vph

7.7) When dealing with discrete parts of a development and extracting trips from a recognised database (such as TRAVL, which is used in this case), all trips for each use are assumed to go to and from that land use. However, when dealing with a mixed use scheme it is reasonable to assume that some people living on the site leave their house in the morning and would also be the ones to arrive at the food store. The model therefore makes some assumptions that a number of these "linked" trips would take place where only the arrival or departure should be counted. This has the effect of reducing the "gross" traffic generation figure and is an accepted component of traffic modelling for mixed use schemes.

7.8) Similarly for the food store, a lot of trips pulling in to use the supermarket are on their way from somewhere to somewhere else, i.e. they are passing by. Therefore the trip to the supermarket is not a new trip on the existing network of local roads, but instead a pass by trip, thus it already exists on the network. The traffic model accordingly makes an allowance for this.

7.9) Allowing for trip reduction factors such as pass-by/linked and diverted trip methodologies, these peak 2-way generation levels reduce as follows:-

Table B:-

All proposed land uses	**AM**	**PM**	**Saturday (mid-day)**
Total	665 vph	875 vph	553 vph

7.10) When table A is compared to table B there is a theoretical modelled reduction in traffic movement with all the new proposed uses as compared to 2005 activities. This suggests that the redevelopment of the Kodak site will in practice reduce traffic volumes on the local road network when compared to the previous active industrial use of the site.

7.11) In considering this "modelled" outcome, it should be noted that all the traffic capacity released due to Kodak operations receding has now been taken up by other traffic. This is apparent from observations at nearby junctions and roads. It is therefore considered that traffic generation will increase significantly following development when compared not to 2005 levels, but to the current conditions.

7.12) There are currently acknowledged issues at junctions within the proximity of Kodak; and in the wider AAP area. Accordingly, in addition to the two proposed site accesses, seven other junctions have been tested which include:

- Courtney Avenue/Long Elmes.
- Harrow View/Headstone Drive (Goodwill to All)
- Headstone Drive/Princes Drive
- Headstone Drive/Ellen Webb Drive/Cecil Road
- The Bridge/Ellen Webb Drive/High Street
- Pinner Road/Station Road/Imperial Drive
- Headstone Road/Greenhill Way

7.13) Out of the seven, the main junctions that are likely to experience a measurable impact as a result of the Kodak proposals are bullet pointed below with the main focus of current and future concern being the Harrow View/Headstone Drive 'Goodwill to All' junction. This junction has been running to capacity during peak times for a number of years. Given the findings of the initial traffic modelling (referenced above, and at the request of officers the applicant has undertaken further sensitivity testing of specific junctions for projected years of 2017 and 2021 in order to better reflect the current and relative dormant nature of the site as compared to future impacts of the redevelopment.

7.14) As part of the sensitivity testing the following junctions were chosen as the most likely to be affected by the proposed development given that they currently exceed capacity at peak periods:-

- Harrow View/Headstone Drive
- Headstone Road/Greenhill Way
- The Bridge/Ellen Webb Drive/High Street
- Pinner Road/Station Road/Imperial Drive

7.15) With the exception of the "Pinner Road" junction the remaining three locations fall within the AAP area and are most likely to be affected (see below) by the redevelopment of the site, such that financial contributions towards their improvement, either principally (as for Harrow View/Headstone Drive) or pooled, alongside longer term CIL and other S106 agreement contributions are justified.

Harrow View/Headstone Drive 'Goodwill to All'

7.16) The existing junction exhibits capacity issues on the majority of its four feeder arms during both morning and evening peak periods. There are no incorporated pedestrian facilities within the signal stages as such provisions would delay traffic and increase vehicle queue lengths without a major reconfiguration of the junction.

7.17) A full review of the junction is required to investigate traffic capacity improvements, pedestrian crossing facilities and cycle links through the junction. An improved junction could allow for a more efficient vehicle discharge from all arms to increase capacity and reducing peak vehicle queuing in future projected years. Pedestrian facilities would nevertheless also need to be an integral part of the final designs as footfall is expected to increase markedly once the development is fully formed.

7.18) The applicant has produced some indicative plans for the junction redesign based upon the relevant technical manuals. The junction itself nevertheless falls outside the application site and improvements would accordingly fall to the Council to design and implement, in consultation with local interests and Members.

7.19) Given the likely scale and cost of such works, the applicants and Council estimate that a sum of £1,000,000 is appropriate to deliver a scheme that offers appropriate optimised pedestrian and vehicle flows through the junction. Within this figure, a provision of £15,000 is included to enable the review and mitigation of the effects of rat-running traffic on nearby residential roads (Victor Road/Sidney Road/Edward Road/Albert Road/Pinner View) as they try to avoid this junction.

Headstone Road/Greenhill Way
7.20) This is one of the other junctions affected albeit to a lesser degree as compared to the above. It is proposed that a financial contribution be apportioned in terms of the percentage new traffic yield impact from the proposed development. As it is envisaged that approximately a 15-20% burden will be imposed by the proposed redevelopment, a sum of £150,000 is to be secured to enable an options appraisal to be undertaken to secure improvement with final in-house design. Likely improvements would involve junction reconfiguration, revised signal phasing etc.

7.21) The next two locations are within a prime corridor linking the Kodak site to Harrow and Wealdstone station/shopping centre and hence will be considered alongside a programme of parallel improvements to pedestrian and cycling facilities in Headstone Drive.

The Bridge/Ellen Webb Drive/High Street
7.22) A similar approach is applied to secure monies on a percentage based impact principle. In this case a similar sum of £150,000 would be required to enable an in-house options appraisal alongside scope for physical improvements to improve traffic flows and pedestrian safety.

Ellen Webb Drive/Cecil Road junction
7.23) The Cecil Road/Ellen Webb junction currently fails to provide a satisfactory environment for both pedestrians and cyclists hence it is proposed to reconfigure the junction so that these current failings can be remedied with revised provisions that cater for the additional demands imposed by the proposed redevelopment. The cost of these works is estimated at £150,000. These remedials would be linked to the adjacent railway bridge underpass in order to enhance the environment and promote greater use by pedestrians and cyclists.

Appraisal of Entry/Exit Points Serving the Site
7.24) In terms of physical vehicular access into and out of the Harrow View East site, there would be two points of entry/exit provided. These are as follows:-

Harrow View East - Site Access Onto Headstone Drive
7.25) This location is currently used as an access point into and out of the site and is a simple priority junction with a kerb-line flare on the north side of Headstone Drive which appears to cut into the site. The applicant proposes for this arrangement to remain in order to part serve the employment B1/B2/B8, C2 care home, D1/D2 community leisure/school use, retail A1-A5, and substantial C3 residential provisions within the main Harrow View East site.

7.26) A proportion of all of the above uses would utilise this access once the scheme is fully complete as an alternative access/egress point would exist in the form of the new site opening onto the roundabout on Harrow View.

7.27) However during the phased introduction of the scheme with particular reference to

initial phases 1A and 1C, which would include in excess of 400 residential units, community/health centre and employment uses plus the activities linked with the proposed retail food store, the Headstone Drive access would be the sole entry/exit point to the site and would therefore be impacted to a higher degree given that the Harrow View opening option would not be available to divert traffic intensity away from this junction until all phases 1-3 are complete.

7.28) On this premise the junction has been tested for its suitability to cater for such traffic movements in the form of a priority junction as is the case at present. The applicant's findings suggest that the junction in this form would function adequately with insignificant queuing on Headstone Drive for projected future years when the above uses are considered. In practical terms the Council is concerned that in practice the concentration of vehicular activity including service requirements is likely to impact on traffic free-flow on Headstone Drive especially during the early phases and it would be expected that mitigation in the form of junction improvements or a mini-roundabout would be introduced to cater for anticipated demand. It is however accepted that once all the scheme phases are completed then traffic intensity will potentially reduce at this juncture given the full availability of the Harrow View access/egress point which would assist in diluting pressures on the Headstone Drive junction.

7.29) A new junction would be designed in conjunction with the associated junction improvements for the 'Goodwill' junction given the mutual proximity of both and the resultant need to provide a coordinated and cohesive design approach. This is costed at £60,000.

Harrow View East and West - Site access onto Harrow View
7.30) The main site access for many will consist of a new '4 arm' roundabout on Harrow View. This roundabout is identical to that which as granted planning permission in 2008 and which is currently under construction. The roundabout will link both the Harrow View East and West segments of the site and will allow for effective traffic 'in-flow' and discharge to and from the site with an acceptable modelled impact on traffic flow on Harrow View for future projected years of 2017 and 2021. The Council is therefore satisfied with this arrangement.

7.31) In terms of physical vehicular access into and out of the Harrow View West site, there would be one primary point of entry/exit from the new roundabout in Harrow View as described above with a secondary 'left turn in/out' arrangement north of the new roundabout provided to relieve some vehicular activity from the main primary access. The roundabout in combination with the secondary provision would adequately facilitate the anticipated residential traffic movements in combination with serving the eastern element of the site.

<u>Scheme Phasing</u>
7.32) The scheme will be delivered in 5 separate and distinct phases denoted as 1A, 1B, 1C, 2 and 3, with phases 1A, 1B and 1C envisaged to come forward together. It is expected that the development will span an anticipated period of a total of 10 years. The phasing is depicted in plan form and would generate variations to traffic flows on various junctions as phases progress as compared to those modelled and expected on full scheme completion. Mitigation measures are required to be in place before the development completes. In particular, the Harrow View / Headstone Drive junction improvement and the new formal crossing on Harrow View, south of the new access roundabout, must be in place before first occupation. Improved linkages between the south and north sides of Headstone Drive, prior to occupation of phase 1B of development on the site is also considered to be necessary to enable appropriate, safe and convenient crossing for pedestrians and cyclists travelling to the site from Harrow and Wealdstone town centres and the residential areas to the south of

the site.

LDF Core Strategy Area Action Plan (AAP) Traffic model

7.33) In order to consider the cumulative impacts of all the major redevelopments within the Intensification Area, which includes Central Harrow and Wealdstone town centres linked by the Station Road corridor, a traffic model for the wider AAP area has been developed in partnership with Transport for London (TfL Preliminary findings indicate that certain junctions in the Intensification Area will be impacted by forthcoming developments that include the application site. TfL's strategic road network i.e. Uxbridge Road (A410), Pinner Road (A404) and Station Road/Sheepcote Road (A409), are not however forecast to be measurably impacted by these proposals.

7.34) The AAP modelled outcomes indicate areas of stress in the highway network that mirror the findings of the locally focused modelling undertaken by the applicant. The Council as highway authority and TfL as strategic transport authority are working together to develop a programme of measures which will seek to balance the effect of growth, with aspirations to improve pedestrian and cycle connectivity and safety, manage further traffic growth through parking restraint, address physical capacity limitations at specific junctions and safeguard economic prosperity and the fundamental desirability of living and working in the borough. The proposed development will be responsible for delivering, through S106 contributions, some of the measures envisaged as part of the wider AAP strategy. The detailed design of these measures and decisions about the prioritisation of such measures, alongside other transport and infrastructure commitments will nevertheless remain with the Council, and its partners.

Car Parking

7.35) The outline status of this application and parameter based approach adopted for the proposals does not furnish the Council with scheme details such as parking locations and their interaction with the street scene and proposed uses throughout the development. As the overall scheme would progress on a phased basis these important aspects of detail would be appraised within future reserved matters applications. This means that at this outline stage only total parking quantums and their anticipated apportioning for each phase, together with appropriate mechanisms that can be applied to establish an internal parking management regime.

7.36) The total quantum of parking provision for the redevelopment would be established once the scheme is fully formed within an anticipated 10 years from scheme commencement. To achieve this aim the scheme would progress in 5 separate phases denoted as phases 1A, 1B, 1C, 2 and 3. As a result the final parking provisions would be built up incrementally and apportioned for each use class demand. The Council would ensure that, at the detailed application stages, parking provisions in line with the appropriate parking ratios as determined at this outline stage are suitably applied to each phase. The applicant proposes that exact parking configurations and numbers with any lease/on-street charging regimes together with resolution of any internal parking management issues including measures such as Car Club space provisions be determined under future reserved matters submissions. This is considered acceptable given the scale, complexity and phased nature of the scheme.

7.37) The applicant has nevertheless applied a trip rate/gross floor area methodology for all the proposed non residential uses in order to determine a likely parking accumulation generated by each proposed use. Peak accumulation levels as compared with maximum London Plan parking standards fluctuate considerably and in order to reflect a realistic

parking demand a parking provision lying within the two has been applied. As the outcomes of this methodology broadly fall within London Plan 2011 parking standards, it is considered an acceptable approach.

7.38) A total of 1257 designated parking spaces (771/486 spaces within Harrow View East/West respectively) are to be provided for all the proposed uses including 286 'off plot' on-street communal spaces (to be provided on the new roads within the development). A further 81 visitor spaces and 121 'leased' spaces are proposed within the multi-storey car park (MSCP) located in zone K, at the eastern extremity of the Harrow View East site. The MSCP has a total potential capacity of 400 spaces hence resulting in a total quantum of 1657 spaces available for the site as a whole.

7.39) Within this figure of 1657 the MSCP will include for 236 designated spaces (including 81 visitor spaces) and 121 leased spaces encompassing a high proportion of the proposed uses.

7.40) The remaining 43 spaces would allow for some flexibility to allow for a greater take up of leased spaces or occasional peaks in visitor activity. The operation of this flexible approach and all the above parking provisions both on and off plot would be monitored and achieved via a suitably conditioned post permission Parking Management Strategy (PMS) which has been supplied by the applicant in framework form. A finalised PMS is expected to address on and off street parking controls, charging and enforcement regimes, appropriate management of the MSCP via charging controls i.e. pay and display, lease arrangements etc thereby helping to ensure that parking provisions are used for their intended purpose. The strategy is expected to result in a controlled and enforced environment which safeguards the design aims of the scheme which endeavour to maintain uncluttered roads and footways which otherwise detract from a newly created public realm and potentially hinder pedestrians and cycle users. The PMS is to be supplied for each phase of development with potential revision at these detailed application stages, whilst the Design Guidelines set out the principles of how the car parking would be delivered.

7.41) The 1257 designated and 400 MSCP parking spaces (totalling 1657) for the A1-A3, A5, B1, B2, B8, C2, C3, D1, D2 proposals are considered to be appropriate to cater for the likely predicted demands and their successful operation would depend on an effective management of space allocation and day to day operation for each use class both on and off plot secured under a full PMS under appropriate condition for each phase of the development as outlined in the previous paragraph.

7.42) Parking provision for the C3 residential element has been determined by way of a 'census' type approach which relates percentage car ownership levels in outer London to the scale of C3 unit. This has been applied giving rise to a total quantum of 870 spaces for the 985 units which range from 1 bedroom studio flats to 4 bedroom houses. For both the Harrow View West/East segments of the site this would result in an average maximum provision of 1.5/1.0 space per dwelling respectively. When considering both areas the average provision for the flatted proposals would be in the region of 0.5 per dwelling. Therefore for the whole site this amounts to an average not exceeding 1.0 space per dwelling. As these figures are considered as maxima averages the final overall parking ratio equates to approximately 0.87 per unit which is considered acceptable given the Public Transport Accessibility Level (PTAL) of 2-4 across both segments of the site and conformity to London Plan 2011 parking standards.

7.43) All use classes during the phased build and at full completion are to be afforded electric

vehicle/disabled provision in line with London Plan 2011 standards (or relevant standard at the time of reserved matters submissions) for sustainable private car travel which the applicant has acknowledged.

7.44) The internal roadways are likely to remain private and would be controlled under a site management regime. The relatively low parking ratios and internal parking enforcement controls could however create parking displacement onto the surrounding road network. A contribution via S.106 is accordingly being sought to facilitate a possible Controlled Parking Zone and/or general parking controls/provisions in the event that this arises following implementation of the development in order to safeguard residential amenity and mitigate the impact of unregulated car parking on the surrounding streets.

Cycle Parking

7.45) The applicant acknowledges the requirement for adequate cycle provision for each use class in accord with London Plan 2011 standards and these provisions will be secured under a future reserved matters submission for each phase which is considered acceptable for the reasoning given in the preceding paragraph. No explicit provision is dictated for motorcycles or scooters but the proposed parking strategy requirements are expected to make such provision and are required by condition.

Internal Roadways/Pedestrian/Cycling/Green Link Provisions

7.46) The Parameter Plans highlight a two-tier road layout for both the east and west segments of the site consisting of primary routes which serve to connect the internal road network to all points of access/egress such as Headstone Drive and Harrow View. These primary routes are supported by a secondary route network which acts as an arterial link from the primary routes to the minor access road layouts hence serving to create suitable connectivity to the various areas of destination within the site.

7.47) A Green Link forming a part of the Council's Green Grid initiative is proposed which commences as a community gateway civic square on the Headstone Drive frontage and continues through the East site across Harrow View into the West site where it merges with the new 'Headstone Green' and connects with Headstone Manor. It will be facilitated in line with the phased programme therefore it will come to fruition in an incremental fashion. The civic square in conjunction with the Green Link will secure a substantial improvement to the public realm at the Headstone Drive juncture in terms of opening up the site and enhancing footway and landscape provisions.

7.48) Detailed designs for the road layouts and how they interact with the Green Link provisions, servicing/delivery/emergency service and school drop off aspects, together with pedestrian and cycle facilities thorough the site will be subject to future reserved matter applications as they come forward as part of the phased regime of the project.

7.49) It will be expected that all the roadways will be substantively traffic calmed in a 'Home Zone' fashion to achieve the desired aim of affording sustainable travel modes such as walking and cycling a clear priority over the motor vehicle. This will be important in the case of the main Harrow View East area as there is also the potential for the primary route to be used as a through route for users of the site and in particular has the potential to become a rat-run for extraneous motorists. Although a primary route is also replicated for the Harrow View West site there is no potential for rat-running given the no through nature of this area however similar 'non-friendly to the private car' treatments in terms of road design/pedestrian linkages in accord with Government best practice and guidance relevant at the time will also be required as part of any reserved matters submission.

Public Transport

Bus Services

7.50) The locality is served by three bus routes, these being the H9, H10 and H14. It is accepted that the application site as it stands generates few demands on these local services. The redevelopment with its multi-faceted use types are predicted to significantly increase demand as would be expected given the significant population of the site coupled with the promotion of sustainable travel modes in lieu of the private motor vehicle. The inherent 'designed in' pedestrian permeability throughout the site would further promote this improvement in accessibility to bus services and hence increase demand.

7.51) In order to cater for this anticipated burden on local services the Council, in tandem with Transport for London, will require contributions towards the service's enhancement via legal agreement:-

- A pump prime contribution of £450,000 is to be provided to finance an additional bus service (H14) covering a period of 5 years in order to meet monitored demand. As time progresses it is envisaged that after that period the service would become self-financing by way of a self perpetuating uplift in passenger demand.

- In order to provide accurate and up to date information on bus arrivals and departures, a sum of £22,000 is requested to provide two bus stop 'countdown' facilities in the proximity of the site. The precise locations would be agreed at a future detailed application stage as bus stops may need to be relocated. A further £20,000 would provide 'real time' information facilities within the site itself to further encourage bus usage.

- A sum of £20,000 is sought to upgrade nearby bus stops in line with TfL's "Accessible Bus Stop Design guidelines". This will encourage usage by improving the quality and ease of bus stop use and physically assist bus operators with service provision.

Train Services

7.52) The Council and TfL accept that London Underground and Overground trip demands associated with the redevelopment can be accommodated by Harrow & Wealdstone and Harrow–on-the-Hill stations.

7.53) As is known Harrow on the Hill station requires substantive improvement in terms of access provisions in order to conform to the Disability Discrimination Act 2004/Equality Act 2010. The station was part of London underground's step-free access programme however funding for this initiative is no longer available. The LDF Core Strategy and AAP for the Intensification Area acknowledge the need for such improvements hence there is an opportunity for a financial contribution to be sought toward such infrastructure improvements.

7.54) On that premise it is anticipated that, where applicable, all major developments within the AAP area such as this contribute to a funding pool in order to provide eventual betterment of Harrow on the Hill station lift provisions. As additional footfall from the proposal is expected from this site and other developments within the AAP, there is an opportunity to benefit this interchange by way of financial contribution from the applicant. Hence it is considered reasonable to seek a proportionate contribution toward TfL's step free access programme.

Framework Travel Plan/Performance Bond Contribution

7.55) A Framework Travel Plan (FTP) has been submitted on an area wide basis encompassing the whole site. Specific and detailed travel plans will emerge and inform this overarching FTP as the development evolves through the phased build. This approach conforms to TfL's guidelines as it addresses all good practice mechanisms necessary to achieve a modal shift away from the private motor car thereby leading toward a sustainable personal travel mode to and from the site. Owing to the long term and phased evolution of the project the FTP adopts a broad brush overarching approach in order to maintain flexibility to cater for an environment of change related to individual detailed travel plans as they are produced on a scheme phase by phase basis over the projected 10 year build period.

7.56) The FTP represents a long term strategy for managing travel by residents, employees, visitors and delivery related activities. It supports measures that promote and support sustainable travel choices and reduce single occupancy car journeys. These measures would for example include marketing and promotion of sustainable travel modes, encouragement of travel smart initiatives, promotion of car clubs, car sharing and working from home.

7.57) Implementation, monitoring and management of the FTP would be undertaken by an appointed Travel Plan Co-ordinator who would work in partnership with Harrow and TfL together with stakeholders within the site. Therefore under the FTP an overall modal shift target for the reduction in private car travel linked to the site would be in the order of 10-20%. To achieve this aim modal shift targets relating to all sustainable travel modes such as walking, cycling and public transport use would be established post permission. Henceforth individual travel plans which evolve from each use type integral to each phase would inherit and further develop this target aim.

7.58) The 10 year scheme comprises of 5 phases (1A, 1B, 1C, 2 and 3) and the first four are anticipated to be occupied by 2017 with occupation of the final phase 5 by 2022. Hence it is proposed to apply a FTP review regime which would commence one year after first occupation of the first phase and then again after 1.5 years to ensure that modal shift targets are being met. Thereon a review would take place every third year with 'half way' interim reviews until full completion of the project, at which time a full review would be undertaken to ensure that the individual travel plans generated for each phase over the 10 year period suitably conform to FTP 'whole site' objectives at that juncture. Review and monitoring would continue on a yearly basis following completion.

7.59) It is considered that in order to ensure the success of the FTP and individual travel plans, a financial 'Performance Bond' be applied as this would act as a clear incentive toward meeting targets set post permission for both the FTP and individual travel plans. This Bond would amount to £100,000 and cover on-going monitoring costs and assist in guaranteeing the target based performance of the FTP.

7.60) Detailed Travel Plans for each phase of the development will therefore be submitted post permission and secured under a S106 agreement and will relate to the Area Travel Plan proposed for the Harrow and Wealdstone Area Action Plan.

Construction Logistics Plan (CLP) and Service Delivery Plan (SDP)

7.61) A full and detailed CLP and SDP will be a requirement to be secured under a planning condition given the prime Core Strategy AAP prominence and sensitivities of the local road network. Both plans will be secured at each stage of progressive phasing given that potential impacts and activities resulting from each phase will be unique and must be mitigated

against in order to minimize/avoid potential detriment to the public realm. As part of the final detailed planning application submission for the penultimate phase 3, a comprehensive SDP will be provided to reflect the full maturity of the scheme.

Conclusion

7.62) Overall, the transport assessment, wider area traffic modelling undertaken for the AAP and the site specific and transport design outcomes associated with the development comprise a significant, long term investment in transport infrastructure, both on and off site. The impacts of the development have been modelled and found to be acceptable, subject to specific mitigation measures and associated mode shift incentives. In implementing the package of works required to manage the impacts of the development on the surrounding network, including pedestrians and cyclists; and surrounding residents, the Council will expect to engage in both further design and consultation with the new and existing community of interests. Officers nevertheless consider that the proposals contained within the application, subject to appropriate controls, can be accommodated on the site and having regard to the findings of the transport assessment and environmental statement need not give rise to significant adverse environmental effects that would warrant rejection of the proposals outright.

7.63) It is therefore considered that the proposals satisfy London Plan policies 6.3, 6.9, 6.10 and 6.13, as well as the objectives of policies CS1 and CS2 of the Core Strategy, saved policies T6 and T13 of the UDP and meet the emerging requirements contained within the AAP. The acceptability of final design layouts will be subject to future detailed reserved matters submissions for each phase to ensure conformity with the outline application and Core Strategy/AAP objectives.

8) HOUSING PROVISION AND AFFORDABLE HOUSING

Housing Provision and Density

8.1) Core Strategy policy CS1H seeks to allocate sufficient previously developed land to deliver at least 6,050 net additional homes between 2009 and 2026. The Harrow and Wealdstone Intensification Area is expected deliver a minimum of 2,800 new homes over the plan period, with the AAP suggesting a minimum output of 1,035 homes from the Kodak site. Notwithstanding the employment designation of the site, the AAP identifies housing as an appropriate form of enabling development and in this context the principle of residential use is considered appropriate. The proposal would contribute 985 new dwellings to the Borough's housing supply, in a mixture of houses and flats. The table below shows an indicative mix of housing for the proposed development:

Affordable	**1 Bed**	**2 Bed**	**3 Bed**	**4 Bed**	**5 Bed**	**Total**
Flats	34	47	0	0	0	81
Houses	0	34	55	20	7	116
Market	**1 Bed**	**2 Bed**	**3 Bed**	**4 Bed**	**5 Bed**	**Total**
Flats	153	233	0	0	0	386
Houses	0	47	148	207	0	402
Total	187	361	203	227	7	985

8.2) This mix, supported by the formal and illustrative application documents, demonstrates a focus on the provision of family housing. This is important, as this site is one of the only strategic sites in the Intensification Area that has the potential to deliver a significant proportion of larger housing (as identified in AAP policy AAP13), particularly affordable housing, which is discussed in more detail below.

8.3) It is therefore considered that the proposal would deliver a wide choice of housing based on current and future trends in line with the requirements of paragraph 50 of the NPPF. The proposal would also comply with Core Strategy policy CS1 in relation to housing provision and policy AAP13 of the AAP in terms of providing for a range of housing types and sizes, commensurate with the character of the area. In addition to the 985 residential units, 4,730sqm of elderly persons accommodation would be provided as part of the scheme (discussed below) and would therefore accord with AAP aspirations in this regard.

8.4) Consideration of the proposed density ranges across the scheme suggests that the development would be carried out at appropriate densities in relation to the pattern of surrounding development (discussed above in appraisal section 4). Further detail in this regard has been provided on p.70 of the revised Design Guidelines. Higher density housing would be concentrated along the Green Link, Harrow View and close to the south east corner of the site where public transport accessibility is higher, whilst two and three storey housing would abut the interwar housing to the north and south of the Harrow View West site.

Affordable Housing

8.5) Core Strategy policy CS1J states that 'the Council will aim for a Borough-wide affordable housing target of 40% of the housing numbers delivered from all sources of supply across the Borough'. This is reinforced in policy AAP13, which also specifies a tenure split of 60% social rented and 40% intermediate.

Numbers of Affordable Rented Units						
Typology	*Phase 1A*	*Phase 1B*	*Phase 1C*	*Phase 2*	*Phase 3*	*Total*
4 bed semi	-	2	-	-	-	2
5 bed terrace	-	7	-	-	-	7
4 bed end terrace	-	4	-	-	-	4
4 bed terrace	-	4	-	-	3	7
3 bed terrace 2	-	8	-	-	5	13
3 bed terrace 1	-	6	-	5	15	26
2 bed terrace	-	3	-	-	8	11
2 bed flat	8	-	-	5	17	30
1 bed flat	4	-	-	5	9	18
Total	12	34	-	15	57	**118**
Numbers of Affordable Intermediate Sale Units						
Typology	*Phase 1A*	*Phase 1B*	*Phase 1C*	*Phase 2*	*Phase 3*	*Total*
4 bed end terrace	-	2	-	-	2	4
4 bed terrace	-	2	-	-	1	3
3 bed terrace 2	-	3	-	-	3	6
3 bed terrace 1	-	3	-	2	5	10
2 bed terrace	-	8	-	-	15	23
2 bed flat	8	-	-	4	5	17
1 bed flat	4	-	-	5	7	16
Total	12	18	-	11	38	**79**

8.6) The proposed indicative mix set out in the above table shows how 20% (197) of the 985 units proposed could be delivered as affordable housing and would comply with the policy requirement for a tenure split of 60% affordable rented and 40% intermediate. This represents the Council's preferred mix, which prioritises the delivery of affordable rented large family dwellings, with 34 to be delivered as part of phase 1B (the Harrow View West part of the site). Having regard to scheme viability and delivery of other infrastructure outcomes (discussed in more detail in appraisal section 18), Council officers in both the Planning and Housing Enabling teams consider this to be the best affordable housing outcome at this time, in the absence of affordable housing grant and given the current economic climate.

8.7) It is however recognised that both economic and funding conditions could improve over the course of this phased development and it is therefore necessary to ensure that a mechanism is in place in the S.106 agreement to ensure that scheme viability is re-appraised at the end of each of the main phases of development (phase 1, phase 2 and phase 3). This is necessary in order to investigate the possibility of both development viability improving and of targeted funding becoming available for the delivery of additional affordable housing in phases 2 and 3, whilst ensuring that a minimum of 20% of the units are affordable over the course of the scheme. The principle of this mechanism has been agreed with the applicant and the details are being finalised for inclusion in the S.106 agreement.

8.8) The Council will also continue to work with the developers of the site to identify new sources of funding that might contribute to a more vibrant and diverse housing offer and a more vibrant community on the site. This would include the scope to incorporate self-build and affordable self-build homes on the site.

Specialist Housing

8.9) The provision of 4,730sqm of elderly persons housing is supported, in line with the aims of London Plan policy 3.8e. The proposed location of this accommodation within Zone H would be convenient for local amenities and would therefore be acceptable.

8.10) In addition, 220 student accommodation units are proposed within phase 1A of the development. The applicant has demonstrated that there is a need for such accommodation and it is estimated that London universities are only able to accommodate up to 50% of their first year students at present and there is therefore an acute shortage of purpose built student accommodation across London. The application site is well placed to provide such accommodation, being only 13 minutes from Euston by train and close to other institutions, such as the University of Westminster's campus at Northwick Park. The provision of student accommodation is therefore supported and a condition is imposed to limit the use of these units to members of a specific institution.

8.11) It is therefore considered that the range and mix of housing proposed would address the objectives of the AAP in terms of housing delivery, as well as promoting mixed and balanced communities in accordance with NPPF, London Plan and Core Strategy requirements. The proposed delivery of 20% affordable housing, with a significant proportion of large family dwellings, is accepted to be the maximum that can be achieved having regard to current development viability and the requirements for the delivery of other infrastructure from the development value created on the site. A review mechanism is nevertheless proposed to ensure that opportunities to increase the provision of affordable housing to meet planning policy aspirations can be realised, where-ever possible.

9) IMPACT ON HERITAGE ASSETS AND SETTING OF HEADSTONE MANOR

9.1) Paragraph 129 of the NPPF states that 'local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise'.

9.2) Policy CS1 of the Core Strategy states that 'proposals that would harm the significance of heritage assets including their setting will be resisted. The enhancement of heritage assets will be supported and encouraged'. Policy AAP8 of the Area Action Plan (AAP) requires development proposals within the Intensification Area to enhance the setting of the Harrow on the Hill Area of Special Character and views of St Mary's Church, whilst the site specific guidance stresses the importance of the relationship of the site to Headstone Manor and the opportunity to improve the Manor's accessibility and setting.

9.3) The applicant has submitted a Heritage Statement in support of the application, which sets out the history of the development of the site in the area and addresses the impacts on nearby heritage assets.

Setting of Headstone Manor

9.4) Grade I listed, Headstone Manor is one of the most historically important vernacular buildings in Greater London and is the earliest known timber framed house in Middlesex, with

a medieval hall and cross wing dating from the early 14th century. It sits on the site of a Scheduled Ancient Monument (SAM) within a complex of Grade II* and Grade II listed buildings. The building is in a deteriorating condition and has recently been placed on English Heritage's Heritage at Risk Register.

9.5) Headstone Manor was formerly the centre of a large farmland setting which has gradually been eroded to be a small pocket of open space within extensive suburban surroundings. The surrounding open land and the sheltered character of the Manor complex therefore helps to retain its agricultural character. This point is highlighted by the emerging AAP, which states 'the green spaces of Kodak playing fields (the Zoom Leisure site) and Headstone Manor,…provide a unique contrast to the rest of the sub area and are a relief to a fairly continuous suburban Metroland landscape'.

9.6) It should be noted that the existing screen of the trees along the western boundary of the Harrow View West site does contribute towards maintaining the tranquil, separate agricultural character for the Headstone Manor complex by screening the site from the suburban development surrounding the zoom leisure open spaces. The proposed development, while providing something of a buffer to Headstone Manor, will nevertheless further encroach upon (although not actually onto) the SAM and with the removal of the tree screen, will change the setting of the listed buildings in views from the west. Care is therefore required so that the landscape proposals respect the agricultural character of the Manor complex and do not further suburbanise the setting of these assets.

9.7) It is considered that the two to three storey scale of the buildings proposed on the Harrow View West site, coupled with the separation distances of between 110 and 200 metres from Headstone Manor, together with thoughtful landscaping of the intervening parkland space would ensure that an acceptable relationship with the Manor complex could be maintained. The detailed design of these buildings and use of materials would be considered further at reserved matters stage, although the submitted Design Guidelines (Chapter 5, Character Zone 1) indicate that the buildings in this area would incorporate simple windows and simple angular massing with a strong contrast of materials.

9.8) The removal of the unsightly palisade fencing between the Manor and the site would also open up views to the west from within the development, as well as enable improved public access by foot or bicycle.

9.9) Headstone Manor complex is currently subject to a programme of investigations designed to enable a funding bid to HLF (and other agencies) that re-positions the Manor house complex within Harrow, and as a strategic heritage asset and destination for north west London. Part of the exploratory bid process is seeking to establish a greater degree of financial sustainability, through the creation of fee earning income streams on the site. The close proximity of significant quantum's of new housing and businesses, plus the new school and the direct pedestrian and cycle linkage between the two sites provide by the proposals is expected to positively contribute towards the achievement of this objective. Accordingly, whilst noting the changes to the setting of the manor complex as a result of the "opening up" of the western site boundary the combined effect of these changes on the setting (and wider placing of this important historical site in Harrow) is considered to be positive, subject to appropriate care being exercised in the design and landscaping of the development on the site. The scope to review and integrate surface water drainage from the site with measures to address the drainage challenges posted by the moat to the manor house also represents a further opportunities for the development to contribute positively towards the enhanced management of the heritage assets.

9.10) Subject to further consideration of design and layout at reserved matters stage (including detailed design of the proposed park and drainage works to the west of the Harrow View West site), the proposal is considered to meet development plan policy objectives aimed at safeguarding the boroughs national heritage assets.

Impact on Views, Setting of Harrow on the Hill and St Mary's Church

9.11) Whilst the site does not lie within the immediate vicinity of any designated Conservation Areas, given the site area and siting in the Borough, the proposed development has the potential to impact on the setting of Harrow on the Hill, a designated Area of Special Character (ASC) with numerous Conservation Area designations and the Grade I listed St Mary's Church, which is recognised in the Core Strategy as an important local landmark. The development could also affect views out of the Brookshill Drive and Grimsdyke Estate Conservation Area, the view from Old Redding car park to St Mary's Church being a proposed protected view in the Council's Draft View Management Framework (DVMF). This viewing corridor crosses the application site (this is also discussed above in appraisal section 4).

9.12) It is however noted that the site is currently occupied by a number of large, bulky industrial buildings, some of which are 37 metres high. The proposed development is generally low rise in scale, no buildings extending beyond 6 storeys in height, a maximum of 24 metres, with the majority of the development being of a much lower suburban scale of 2-4 storeys. The exception to this is the Kodak chimney, which is to be retained as a landmark feature (discussed in more detail below).

9.13) The proposal would therefore tie in more with the scale of surrounding buildings than the existing industrial structures and would therefore result in an improvement in visual impact terms, when viewed from the Old Redding car park. The setting of the Harrow on the Hill ASC and its heritage assets would therefore be enhanced as a result, as would the views out of Brookshill Drive and Grimsdyke Estate Conservation Area.

Archaeology, Air Ministry Citadel and Kodak Legacy

9.14) There are no statutorily listed buildings within the application site boundary. However, a number of older industrial buildings date back to an earlier period of Kodak's development. These include the 1925 power house, with its associated chimney. The proposal to retain part of the power house as a reminder of the former use of the site is therefore supported, in addition to the place making benefits discussed above in section 4 of this appraisal. The treatment of this structure, its restoration and management will need to be secured by condition.

9.15) The Harrow View East site is also occupied by the underground remains of a former Air Ministry Citadel, known historically as 'Station Z', which served as contingency wartime administration space. This structure, which originally comprised both surface and sub-surface structures, now only retains its sub-surface features. This is being considered by the Council for local listing following recommendation by English Heritage and is located adjacent to the railway line. It essentially consists of an underground bunker, which previously formed the basement of a larger building (examples of an intact building exist elsewhere). The top of the bunker is approximately ground level on that part of the site and Kodak currently use this open area for storage. It is proposed to retain this structure in situ and construct the proposed energy centre and multi-storey car park on top. Given that the special interest of the bunker is its internal appearance below ground level, it is considered that the proposed development above would not unduly impact on its character, nor would it

affect the way it is appreciated. Construction works would not unduly impinge on the structural integrity of what is intrinsically a very strong feature.

9.16) English Heritage consider that there may be archaeology associated with Kodak's development on the site, but earlier finds are likely to be heavily truncated. Conditions are recommended requiring the implementation of a programme of archaeological mitigation and standing building recording and these are set out at the end of this report. More specific recognition of the legacy of the Kodak factory is expected to be incorporated more subtly over the sites development, through for example street naming and the public art programme proposed for the site.

10) PROVISION OF COMMUNITY FACILITIES, SCHOOL AND HEALTHCARE

Community Centres

10.1) The proposal includes the scope for construction of a 1,562sqm community centre within development Zone A, as well as the conversion and re-use of the Kodak power house building (Zone F2, 550sqm) for community café use. The AAP envisages the provision of community facilities on the application site to support the new sustainable community to be created and the scheme responds to that aspiration, so these uses are supported in principle. It is not clear at this stage how these community facilities will be built or operated or maintained. The Council would not expect to build, operate or manage such a facility. A S106 obligation is therefore necessary to require the applicant to engage with community groups who may be interested in the space or to facilitate improved community access to existing facilities at Headstone Manor, adjacent to the site. The part of the site and the land for the community centre is set aside for this use and will need to be safeguarded within the site masterplan and by way of the S106. In the event that the site does not come forward for development, proposals for interim landscaping will also be required to avoid the site, in a prominent location, harming the overall character and appearance of the development, from Headstone Drive.

Education

10.2) The application makes clear an expectation that the MUGA within the school site will provide for shared use outside of school hours. It is assumed that this facility will be provided alongside the development of the school buildings.

10.3) The NPPF states that 'the government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities'. It goes on to make clear that local planning authorities should 'give great weight to the need to create, expand or alter schools'. London Plan policy 3.18 seeks to support the provision of early years, primary and secondary school and further and higher education to support a growing population and to enable greater educational choice. Core Strategy policy CS1 identifies the delivery of a new primary school and secondary school as key strategic infrastructure and the Council is currently undertaking a medium term strategic project to expand primary schools, as there is a significant increased demand for school places in the primary sector, primarily because of the increased birth rate in recent years.

10.4) The child yield from the proposed development has not been factored into the Council's primary school expansion programme and a new primary school is proposed as part of the development, as there is not the capacity in local schools to absorb children from the development. In Harrow, two sets of multipliers exist for calculating child yield in new developments. The difference between the two is that the newest multipliers factor in a larger child yield for privately owned family housing, as well as having a separate multiple for two

bedroom private houses, as compared to two bedroom flats. This is considered to be the most robust set of multipliers, as it more accurately reflects demographic circumstances in terms of household size in Harrow.

10.5) Based on this multiplier, in terms of primary school aged children, it is expected that the development would yield some 236 children. This would give rise to a demand of just over 1 form of entry. The proposed primary school would allow for up to 3 forms of entry, so would be more than is required to mitigate the impact of the new development. Accordingly, the development makes a strategic contribution to education need in the borough by providing a site suitable to meet a wider requirement than that arising from the development as identified in the assessment of the Environmental Information submitted with the application. This is supported, as this school could in the future help to meet the needs of the surrounding area or improved choice, being well located to do so. The school would be located within zone P of the development, on land that is currently cleared and the S.106 agreement would require the land be set aside for development of the school upon commencement of phase 1 of the scheme.

10.6) The recent reform of education funding, including changes to the means by which new schools are delivered, means that it is anticipated that development of a new primary school building on the site will be funded directly by the government through the "Free School" programme. Accordingly, whilst acknowledging the importance of making land available for a primary school on the site, officers consider that the need to explicitly fund a school building from S106 is not necessary. It is expected that demand for the delivery of a primary school in this area will be significant. Development zone P would provide adequate space to accommodate a 3 form entry primary school, including outdoor play space and the proposed multi use games area (MUGA), and would also be within walking distance of other public open spaces. Adequate pick up and drop off facilities could also be provided on the road to the east of this zone, which should ensure that neighbouring occupiers are not unduly inconvenienced by school traffic.

10.7) In terms of secondary education provision, the Council's most robust set of multipliers show that the development would yield some 167 children. Whilst there is surplus capacity in years 7-9 at present, this position will change in 2015 when the increased numbers in the primary sector begin to progress to the secondary sector. It is therefore considered appropriate to seek a financial contribution towards secondary school expansion and this is included in the agreed heads of terms.

10.8) In terms of nursery provision, it is expected that the development would yield some 291 children between the ages of 0-4. The proposed community facility would be likely to incorporate some nursery facilities, but it is considered that the equivalent of 30 full time places should be provided within the school. The development parameters for the school building would allow for this.

10.9) It is therefore considered that the proposal, in the form of an on-site provision of primary education and an off-site contribution towards secondary education, would adequately mitigate against the impact of the proposed development in this regard, in line with the objectives of the NPPF, London Plan policy 3.18 and the Council's Core Strategy.

<u>Healthcare</u>

10.10) The application proposes a health centre of up to 2,816sqm within Zone A of the proposed development. This would most likely serve as a Primary Care Centre, which could be occupied by up to 8 general practitioners (GPs) and other associated staff. The centre

would be larger than would be required to serve the population of the proposed development, but research undertaken by the applicant indicates that there would be demand for the size of centre proposed, which would also contribute to meeting additional local capacity needs.

10.11) The Pinn Medical Centre is an example of a similar facility in the Borough. The centre serves a population of nearly 20,000 patients with a team of four GP partners, five associate GPs, five practice nurses, the practice manager and a full team of administrative staff. In addition to GP services there is an on-site pharmacy and a dental surgery and the centre also provides X-ray and ultrasound facilities, in addition to other specialists.

10.12) The Government's agenda is to relocate services out of hospitals and into primary care settings and to reduce the number of small practices in favour of larger ones (partly in response to the outcome of the Shipman Inquiry, which concluded that sole-practitioner practices will no longer be permitted). Three GP practices have registered an interest, two having given an indication of their requirements, and the OPA allows for the larger of the two proposals, which is similar in scale to the Pinn Medical Centre. The proposed health centre would therefore consolidate and extend facilities for healthcare in the area, thereby serving the needs of the population of the proposed development, as well as providing for wider requirements. This part of the proposal is therefore supported by officers.

Care Home

10.13) The OPA proposes a 5,500sqm care home within development Zone D and the applicant's market testing indicates a demand for this type of use in the locality. This development zone has adequate space to accommodate the care home and associated open space and is sited close to the retail uses and amenities in Zones A and B, as well as being well located for public transport links. This part of the proposal is therefore considered to be acceptable, subject to detailed consideration of design and layout at reserved matters stage.

Conclusions

10.14) Policies 3.16, 3.17 and 3.18 of the London Plan and CS1 of the Core Strategy, together with saved policies C2 and C7 of Harrow UDP seek to ensure that new development contributes towards the delivery of sustainable communities through the provision of appropriate infrastructure. Through a combination of on-site and off-site financial contributions, the proposals are considered to address the expected needs of future occupiers of the site for community infrastructure to support sustainable patterns of living and working. Accordingly, subject to specific controls and contributions, delivered through the terms of the planning permission, and notwithstanding the uncertain funding position in respect of the community centre facilities, the proposals are considered to satisfy the requirements of the development plan in respect of community infrastructure.

11) SUSTAINABILITY AND CLIMATE CHANGE MITIGATION

Energy Strategy

11.1) Paragraphs 96-98 of the NPPF relate to decentralised energy, renewable and low carbon energy. Chapter 5 of the London Plan contains a set of policies that require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions. Specifically, policy 5.2 sets out an energy hierarchy for assessing applications, as set out below:

1) *Be lean: use less energy*
2) *Be clean: supply energy efficiently*

3) *Be green: use renewable energy*

11.2) Policy 5.3 seeks to ensure that future developments meet the highest standards of sustainable design and construction, whilst policies 5.9-5.15 support climate change adaptation measures.

11.3) The applicant has submitted an Energy Statement, which details the likely energy demands of the proposed development and proposed energy supply measures. A Sustainability Statement has also been submitted, which appraises policy and reviews project specific targets in relation to matters such as energy, water, resource conservation, waste management, biodiversity and pollution control.

1) Be lean

Energy efficiency standards

11.4) The submitted Energy Statement indicates a range of passive design features and demand reduction measures that could reduce the carbon dioxide emissions of the proposed development. Under the first stage of the London Plan energy hierarchy, the development is estimated to achieve a reduction of 373 tonnes of carbon dioxide per annum, or an 8% reduction against the 2010 Building Regulations baseline.

11.5) Further to a request from the GLA, the applicant has provided indicative detail on the likely measures to be employed in order to achieve this reduction (paragraphs 5.96-5.101 of Application Addendum). These include:

- Increased performance of insulation and glazing elements and a greater degree of air tightness;
- Building orientation and thermal massing;
- External shading and reactive glazing;
- Maximisation of natural lighting to buildings;
- Use of low energy lighting and lighting control systems/sensors;
- Passive ventilation and high efficiency mechanical ventilation as appropriate;
- Intelligent appliances, monitored by smart meters; and
- Holistic building management and control systems.

Detailed information is required by condition for each phase in the form of a detailed energy strategy for each phase of development.

2) Be clean

District heating

11.6) The applicant is proposing to install a site heat network linking all the buildings on Harrow View East and the flatted elements of Harrow View West (located fronting Harrow View). The individual houses on Harrow View West would be supplied with their own individual heating systems, such as air source heat pumps. An indicative layout for the proposed heat network is included and is considered to be acceptable.

11.7) The network would be supplied from a single energy centre, proposed to be located on the ground floor of the multi-storey car park within Zone K. Whilst this is to be located within phase 3 of the development, the Energy Statement confirms that it would be constructed in 2013 to enable it to serve the first phase. This would be possible as this part of the site is currently cleared of buildings and under-used. A condition is imposed requiring this to be in place for occupation of the first phase. The energy centre would be approximately 936sqm in size, with space for future expansion, which is welcomed. Indicative location and layout

drawings have been provided and are considered acceptable.

11.8) The applicant has investigated the possibility for the network to serve other buildings adjacent to the development, which is welcomed. However, it is noted that the potential for connecting to the greater number of buildings with large heat loads, to the north of the site, is severely constrained by the railway line. The energy centre could however supply adjacent properties on the Waverley Industrial Estate and the Crown Court in the future.

Combined heat and power

11.9) On the basis of potential demand, the applicant is proposing to install a 1.2 MWe gas fired combined heat and power unit (CHP) as the lead heat source for the site heat network, subject to prevalent technology at the time and commercial viability. The CHP size would be optimised to provide the domestic hot water load, as well as a proportion of the space heating, which is supported in relation to London Plan policy 5.6.

11.10) Option 1 as set out in the Energy Statement (8% reduction through 'lean' measures, with gas engine CHP and air source heat pumps) has been selected as the most economical option to supply the network and would result in a reduction in regulated carbon dioxide emissions of 2,429 tonnes per annum. The shortfall of 470 tonnes would be met either through the installation of solar PV on site or through the use of allowable solutions.

3) Be green

Renewable energy

11.11) The applicant has investigated the feasibility of a range of renewable energy technologies and has identified photovoltaic panels (PV) as a technology that could achieve the required additional carbon dioxide reductions for the development. Further to the GLA's request, the applicant has provided confirmation that PV would be used, as well as details of the amount proposed and associated carbon dioxide savings, in line with the requirements of London Plan policy 5.7.

11.12) As discussed above, the preferred energy supply technology of gas engine CHP has a modest shortfall of 470 tonnes of carbon dioxide per annum and it is proposed to use solar PV as a means of 'topping up' the shortfall to achieve the required reduction of 40% on Building Regulations (based on build-out of 2013-2016). The capacity for electrical generation from solar PV on the site will be determined by the layout of the development, including analysis of roof size/angle, aspect and shading. The applicant states that it is not possible to carry out a detailed analysis at this stage, but a high level assessment of the likely generating capacity has been conducted. This assessment concludes that 13,306m2 of PV panels would be required to make up for the shortfall of 470 tonnes of carbon dioxide. It is suggested that all residential and non-residential, particularly the employment units, should have PV and green roofs. The design requirements for solar PV should feed into plot level design with a view to optimising roof design and building orientation to maximise generating capacity. If it is found not to be viable to install the required area of PV within the development boundary, it is recommended that an allowable solutions route be followed.

Conclusion on overall carbon dioxide savings in relation to energy hierarchy

11.13) In relation to the requirements of London Plan policy 5.2, the proposed option would result in a reduction of 2,802 tonnes of carbon dioxide emissions per year in emission compared to a 2010 Building Regulations compliant development, equivalent to an overall saving of 60%. This would exceed the minimum targets set out in London Plan policy 5.2 and this is considered to be a proportionate approach to the phased nature of the scheme, whereby later phases would not be expected to commence until 2017 when an advanced

Building Regulations baseline would operate.

11.14) A condition is recommended to ensure that detailed plot developers undertake detailed assessments at reserved matters applications to update the strategy submitted with this application. As discussed above, a condition is imposed requiring this to be in place for occupation of the first phase.

Urban Greening

11.15) London Plan policy 5.10 promotes urban greening measures, such as green infrastructure and public realm planting to contribute to the adaptation to, and reduction of, the effects of climate change. London Plan policy 5.11 requires major development proposals to be designed to include roof, wall and site planting where feasible.

11.16) The proposed provision of a Green Link through the site is supported in this regard, as is the Headstone Manor Park. The GLA requested a roof strategy to be included in the revised Design Guidelines (DG), to deal with the relationship between the provision of green roofs and solar PV. Section 3.9 has subsequently been added to the DG, which sets out guidelines for the provision of green roofs, which refers to 'Living Roofs and Walls Technical Report: Supporting London Plan Policy'. In line with the priorities for the installation of PV panels discussed above, the employment and retail roofspaces have been designated as 'primary roofscape elements' to allow for all the PV requirements. The residential units on Harrow View East and parts of Harrow View West (as well as the community and heath centres) would be 'secondary roofscape elements' to incorporate a mixture of the two, whilst the residential units closest to Headstone Manor would be 'tertiary roofscape elements', whereby there would be a priority to respond to the setting of the Manor, rather than provide green roofs or PV. It is considered that this would create an appropriate framework for the provision of PV and green roofs through the detailed design stage.

Sustainable Urban Drainage (also discussed in more detail in appraisal section 12 below)

11.17) London Plan policy 5.13 seeks to ensure that development utilises sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so. The submitted drainage strategy seeks to ensure that properties within the development would be protected from flooding in a sustainable manner, including the provision of SUDS techniques to supplement on-site attenuation facilities. The Environment Agency support the implementation of SUDS as part of the scheme and recommend a condition to ensure that the drainage scheme is implemented in line with the recommendations in the submitted Flood Risk Assessment (FRA). It is also considered necessary to impose a condition to ensure that detailed designs come forward for each phase of development, to ensure an acceptable arrangement over the course of implementation.

Ambient noise

11.18) London Plan policy 7.15 seeks to minimise the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals. The submitted Environmental Statement contains information that addresses the noise and vibration impacts associated with the proposed development.

11.19) The site is surrounded by noise sources including roads, a railway line and industrial operations. The existing industrial operations are also responsible for some noise emissions, albeit that these will have declined with activities on the site in recent years. The proposed employment uses would provide a physical barrier between the proposed residential uses and the adjacent railway line. A worst case scenario has been employed in the submitted Environmental Statement (ES), including a tonal penalty for noise of an industrial nature. The

GLA raised some queries in relation to the long term measured noise levels set out in table 7.6 of the ES. These queries have been explained by the applicant's consultant and officers of the GLA and the Council are satisfied that a properly worded condition can be imposed to ensure that any noise from the proposed industrial units would not unacceptably increase background noise levels.

11.20) The Council's Environmental Health Officer is satisfied that the contents of the ES chapter on noise and vibration adequately address potential concerns over noise and vibration both during construction and during operation. The amendment of the application in March 2012 to introduce B2 uses within zone L of the scheme is also not considered likely to give rise to specific adverse impacts upon surrounding or nearby residential uses, provided that the proposed mitigation measures outlined below are implemented.

During Construction

11.21) A Construction Environmental Management Plan will be sought by condition in relation to each phase of development. The contractor for each phase would be required to undertake a full noise assessment when more detailed information regarding construction activities and plant usage is available. Each report should specify detailed mitigation requirements, which could include:

- Careful selection of working methods and programme
- Selection of quietest working equipment, properly maintained and silenced
- Shutting down equipment when not in use
- Positioning of equipment behind physical barriers and directing noise emissions away from sensitive receptors
- Handling of materials in a manner that minimises noise
- Switching audible warning systems to a minimum
- Planning routes and times of deliveries to minimise nuisance
- Use of signs and instructions to advise site employees
- Engage in community liaison to explore ways of minimising noise

During Operation

11.22) The Council's Environmental Health Officer has requested details by condition in relation to noise attenuation for proposed uses in each phase of development, which could include:

- Noise barriers
- Specified glazing and ventilation
- Orientation of buildings to screen amenity areas from noise sources
- Design buildings to ensure that service areas are located away from noise sensitive rooms

An appropriate condition is therefore recommended in addition to a condition requiring a scheme for the control of noise from any B2 use that might come forward within zone L of the development. It is considered that these mitigation measures, coupled with the additional justification provided in the revised Design Guidelines, would ensure that there would be no unacceptable conflicts between the uses proposed. In officers view, this would overcome the concerns raised by the GLA in relation to London Plan policy 2.17.

11.23) It is therefore considered that the proposed mitigation measures would ensure that neighbouring occupiers and future users of the site would not experience excessive noise and vibration levels as a result of construction activity or as a result of the types of uses proposed. The proposal would therefore comply with the NPPF and London Plan policy 7.15 in this regard.

Air quality

11.24) London Plan policy 7.14 seeks to ensure that development proposals minimise increased exposure to existing poor air quality and make provision to address local problems of air quality, particularly within air quality management areas (which the site is) and where the development is likely to be used by large numbers of people vulnerable to poor air quality (such as children or older people). Development proposals should be at least air quality neutral and should not lead to further deterioration of existing poor air quality.

11.25) The submitted ES addresses issues relating to air quality and the Council's Environmental Health Officer is satisfied with this assessment. The assessment has determined that the overall operational air quality effects of traffic associated with the development (having regard to the revised traffic assessment, as requested by the GLA) would be of negligible significance at existing receptors and at receptors introduced on the application site as part of the proposed development. The impacts of the proposed energy centre and the introduction of B2 uses are also determined to be of negligible significance. No Air Quality Standards Objective would be exceeded as a result of the proposals. The assessment has also determined that the Kodak factory operations undertaken alongside early development phases would be unlikely to lead to any accedences of air quality objectives on the application site. Nevertheless, to ensure that such outcomes are realised, proposed mitigation measures set out in the ES are outlined below:

During Construction

11.26) It is proposed to implement Best Practice Measures during construction, to be included in the Construction Environmental Management Plan for each phase. These measures could include:

- Erection of solid barriers to site boundary
- No bonfires
- Site machinery and dust causing activities to be located away from sensitive receptors
- Hard surface all site haul routes
- Install real time dust monitors
- Wheel washing at exits to the site
- No site runoff of water or mud
- Use of water as a dust suppressant
- Wrap buildings to be demolished

During Operation

11.27) The proposed B2 uses are generally required to operate under the Environmental Permitting Regime, whereby permits are required for a range of activities that are regulated by the Environment Agency or the Council. Any use operating within such a permit would have to assess the impacts on air quality and it is therefore unlikely that there would be a significant impact on air quality as a result of B2 uses that might come forward and this is therefore adequately covered by other legislation. The main impacts on air quality during operation would be from traffic generation associated with the proposed development. As discussed above in appraisal section 7, a number of mitigation measures are sought, including measures to encourage the use of sustainable modes of transport. The successful implementation of these measures would help to reduce emissions from traffic and it is concluded that the impact of the development would be negligible in this regard.

11.28) It is therefore considered that the proposed mitigation measures would ensure that the development would lead to a further deterioration of air quality in this air quality

improvement area. The proposal would therefore comply with the NPPF and London Plan policy 7.14 in this regard.

12) FLOOD RISK AND DRAINAGE

12.1) A Flood Risk Assessment (FRA) has been submitted based on the indicative masterplan that accompanies the OPA. Although the part of the site to be developed falls within flood zone 1, due to the site area of 25.4 hectares, the development has the potential to generate a large amount of surface water. The FRA seeks to demonstrate how surface water management and drainage is integrated as a key consideration in the development of the scheme, with surface water storage and SUDS strategies included in the document (as discussed above).

12.2) The Environment Agency (EA) and the Council's Drainage Engineer have confirmed that the FRA is satisfactory. Conditions are recommended as per EA and Drainage requirements in relation to the implementation of mitigation measures detailed in the FRA, as well as a detailed scheme of surface water attenuation for each phase of development. Subject to these conditions, the proposal would not increase the risk of flooding on the site or elsewhere and the proposals would therefore accord with the expectations for consideration of flood risk contained within the NPPF, and the requirements of Core Strategy policy CS1 and saved UDP policy EP12.

13) ACCESSIBILITY AND INCLUSIVITY

13.1) As the application is submitted in outline, full details of site levels and designs of individual buildings are not before the Council for consideration at this stage. However, the details of site levels that are shown on the Parameter Plans demonstrate that an accessible public realm should be able to be created and a condition is therefore recommended to ensure that an accessibility scheme is provided with each reserved matter application. It is also recommended that a condition is imposed to ensure that all dwellings comply with Lifetime Homes standards, with 10% Wheelchair Homes compliance.

13.2) Subject to these conditions, the proposal would comply with London Plan policies 3.8 and 7.2, which require all new developments to be fully accessible to all.

14) ECOLOGY AND BIODIVERSITY

14.1) The application is accompanied by an Environmental Statement (ES), which includes consideration of the ecological and biodiversity interests on the site. Policy CS1 of the Harrow Core Strategy seek to safeguard ecological interests and wherever possible, provide for their enhancement.

14.2) The site is not located close to any nationally designated areas of ecological importance. Notwithstanding this, the proposed comprehensive redevelopment of the site represents an opportunity to greatly improve the biodiversity of the area and it is proposed to achieve this through the introduction of green open spaces, notably the Green Link and Headstone Manor Park. The introduction of landscaped green spaces to the Harrow View

East site have the potential to greatly improve the ecological value of the site, whilst the proposed drainage works on the Harrow View West site would involve the creation of wetland habitats that are identified as important by Harrow's Biodiversity Action Plan.

14.3) The Council's Biodiversity Officer and Natural England are satisfied that the surveys carried out in relation to protected species such as bats are adequate. Conditions are recommended in relation to habitat creation and enhancement as set out at the end of this report, as well as in relation to the mitigation of possible impacts from construction activity, as recommended by the ES. Subject to these conditions the proposal is considered to result in an improvement in terms of biodiversity, in line with the requirements of paragraphs 109 and 118 of the NPPF and the Core Strategy.

15) LAND CONTAMINATION AND REMEDIATION

15.1) The NPPF (paragraph 121) requires LPAs to ensure that the site is suitable for the new uses proposed, taking account of ground conditions including pollution arising from previous uses. Adequate site investigation information, prepared by a competent person, should be presented. This reflects the requirements of saved UDP policy EP22, which also requires an investigation of the hazards posed and appropriate.

15.2) The application is accompanied by a Remediation Strategy (RS), which summarises the extent of the land contamination on the site that has arisen from over a century of industrial activities. The RS has been developed based on environmental information for the site obtained during various ground investigations. The report also acknowledges that further information will be obtained during demolition and site clearance and the recommendations include provision for dealing with any unexpected contamination encountered. A number of recommendations are also made for dealing with the contamination, including mitigation or removal of localised areas of contamination and the installation of an inert cover system to gardens, landscaped areas and public spaces to prevent exposure of contaminants in soils.

15.3) The RS concludes that the site can be made suitable for the proposed mix of uses, subject to the recommendations set out in the strategy being carried out, which would be subject to approval by the Regulators. The abstraction wells on the site would be decommissioned in consultation with the Environment Agency (EA).

15.4) The EA and the Council's Environmental Health department have reviewed the RS and consider it to be satisfactory. A number of conditions have been suggested, including one relating to piling of foundations (for which particular care will be required to ensure that the integrity of local property interests beyond the site is not compromised). Subject to compliance with these conditions, it is considered that the site can be made safe for future end users (residents, employees and the general public) and the proposal is therefore considered to be acceptable in this regard.

16) TREES AND NEW DEVELOPMENT

16.1) On sites where there are existing trees, saved UDP policy D10 requires a full tree survey to be submitted, accurately plotting all trees on site with records of height, spread, heath, age and amenity value. Policy CS1 of the Harrow Core Strategy and the specific AAP proposals for the site also recognise the need to consider existing mature trees on this site in the proposed redevelopment. The site specific guidance in the AAP states that 'existing mature trees should be considered for retention and integration with proposals along

Headstone Drive and Harrow View edges'.

16.2) A full Arboricultural Report has been submitted in support of the application and this was revised in March 2012 in response to comments from the Council's Tree Officer, who raised concerns over the extent of tree loss.

16.3) The development would involve the removal of 89 out of 241 trees or groups (including protected trees (TPOs)), comprising the majority of the internal site trees and some of the site screening. The impact of these tree removals is likely to be significant and discernible, particularly during the early years of the development, before replacement planting has matured. The revised Arboricultural Report confirms that some of the Lombardy poplars adjacent to the western boundary of the Harrow View West site with Headstone Manor would be retained, alongside the limes along the eastern boundary of the Harrow View East site with Harrow View. The majority of the other removals would comprise mostly internal site trees of low amenity value and the majority of TPO trees are to be retained.

16.4) Application Plan HV(00)AP003 has also been amended to show the trees to be retained along with restrictions on excavation. The Development Specification states that it would be for reserved matters applications to seek permission from pruning or felling of trees, if necessary. Zone specific recommendations state that the design of development zone G should have regard to the trees along Harrow View. Notwithstanding these amendments, it is considered that it is necessary to impose a condition requiring further specific justification in relation to the development of each zone and its impact on trees earmarked for retention and this should accompany each reserved matters application.

16.5) The Council's Tree Officer is in agreement with this approach and therefore, despite the significant potential short term impact of the proposal in arboricultural terms, the improved overall landscape quality that would result from the proposed open space and the opportunity to provide improved forms of planting throughout the scheme, should result in a long-term improvement. Critically, key boundary trees, such as the limes along Harrow View, would be retained as per AAP aspirations. The proposal would therefore be acceptable in this regard and would comply with saved UDP policy D10 and the objectives of Core Strategy policy CS1.

17) S17 CRIME & DISORDER ACT

17.1) As the application is submitted in outline, detailed drawings of building design and layout are not before the Council for consideration at this stage. However, it is necessary to consider the extent to which the submitted Parameter Plans and Design Guidelines deal with secured by design issues.

17.2) The majority of the site would be developed in a simple block structure, which is typical of the area. The Design Guidelines include stipulations that buildings with active frontages should surround the principal public spaces in the development and the illustrative masterplan indicates that an acceptable residential layout can be provided in terms of natural surveillance of streets, spaces and parking courtyards. Further consideration will be given to this issue at reserved matters stage.

17.3) The Metropolitan Police Crime Prevention Design Advisor has requested detailed information relating to Secured by Design measures and this can be requested by condition. Conditions are also recommended to ensure that the public open spaces, including the

proposed Headstone Manor park, are adequately lit and further consideration of the layout of these spaces will be undertaken on consideration of reserved matters applications. It is therefore considered that an acceptable arrangement can be provided throughout the scheme and the proposal would therefore not increase the risk or fear of crime.

18) S.106 OBLIGATIONS AND INFRASTRUCTURE

18.1) The applicants' Planning statement argues that because of the costs associated with bringing forward the development on the site, the proposals are currently unable to meet the Councils target for affordable housing delivery, and meet the associated infrastructure requirements necessary to fully mitigate the impact of the development. As touched on above in relevant appraisal sections, to consider this specific issue, the Council has engaged its own specialist development viability consultants, GVA to assess and comment on the applicant's appraisal of costs and returns (which for commercial reasons is not submitted as part of the application documentation).

18.2) GVA consider that the assumptions used by the applicant, including provisions for bank financing, marketing and developer returns, alongside the direct development costs and values are broadly reasonable, having rear dot current market conditions. Accordingly, based on the provision of 20% affordable housing as (discussed above in appraisal section 8) there would be a total residual 'infrastructure pot' of Circa £10 million, available to fund infrastructure in addition to account being given to the Mayoral CIL (discussed in more detail below in appraisal section 19). This fund is delivered progressively throughout the phases of development as set out below.

	Phase 1A	**Phase 1B**	**Phase 1C**	**Phase 2**	**Phase 3**	**Combined**
S.106	£3,150,404	£1,346,500	£96,500	£3,397,019	£1,856,500	£9,782,468
Mayoral CIL	£366,500	£302,500	£63,500	£232,500	£556,500	£1,585,955
Combined	£3,516,904	£1,649,000	£160,000	£3,629,519	£2,413,000	£11,368,423

18.3) The figures in the above table set out the approximate amount of money available at each phase of development for the provision of infrastructure. Below is the list of agreed heads of terms that follow from the consideration of the effects of the development (outlined in this appraisal) and the likely means by which these effects will be mitigated. The broad headings and contributions are considered reasonable and justified in accordance with the requirements in Regulation 122 of the Community Infrastructure Levy Regulations on the use of planning obligations, i.e. that they need to be:

(a) necessary to make the development acceptable in planning terms;
(b) directly related to the development; and
(c) fairly and reasonably related in scale and kind to the development.

18.4) Refinement of the schedule of contributions is currently on-going and a full schedule of proposed contributions with individual justifications is expected to be reported finally to the Planning Committee, together with the phasing of such payments. The proposed break down and phasing of payments in the later stages will however depend upon values being determined from development at that time, having regard to the objective of optimising the delivery of outcomes to deliver a sustainable form of development. The S106 will accordingly contain a mechanism that seeks to enable the re-valuation of the development viability at trigger points through the delivery of the overall masterplan.

Broad proposed heads of terms

- **Sport and open space:** A total of £2,395,000 contributions towards playing pitch and changing room facilities improvements at nearby Council sites, as well as a contribution towards the development of Harrow Leisure Centre and the provision of a MUGA within the proposed primary school;
- **Education:** A total of £1,180,000 contributions towards the provision of land for the primary school and an off-site contribution towards secondary education;
- **Transport and travel:** A total of £2,952,000 contributions towards highways/junction improvements, car parking restrictions, improved pedestrian and cycle facilities, improved public transport facilities and the provision of a green travel plan;
- **Employment and training:** A total of £2,100,000 contributions, including the provision of a subsidised business incubator centre, contributions towards inward investment, local employment, town centre management and construction training.
- **Affordable housing:** The provision of 20% of the proposed housing as affordable (in accordance with the Council's preferred mix), with a mechanism to re-appraise site viability and the availability of grant throughout the course of the development; and
- **Community, heritage and leisure:** A total of £1,490,000 contributions, including the provision of land for a community centre, the provision of public art throughout the scheme and contributions towards Headstone Manor.

19) MAYORAL CIL LIABILITY

19.1) On 1st April 2012, the Mayor of London introduced a Community Infrastructure Levy (CIL) to raise £300 million towards the delivery of the Crossrail project. The CIL is applicable to any development granted planning permission on or after the 1st April 2012 and is collected by the Council once development commences. In Harrow, the CIL is chargeable at a rate of £35 per sqm and the chargeable amount should be calculated in accordance with Regulation 40 of the Community Infrastructure Levy Regulations 2010 (as amended).

19.2) The applicant has provided a breakdown of buildings on the site that are currently in lawful use and are to be demolished. It is considered that this is an accurate representation of the existing situation and the total existing floorspace is 91,479sqm. The total proposed floorspace (excluding the health centre and primary school, which are not chargeable under the Mayoral CIL) is 136,792sqm. The chargeable area is therefore 45,313sqm at £35 per sqm, making a total of £1,585,955 payable for the whole development. A provisional liability notice will be issued on this basis, with detailed payment arrangements to be agreed.

20) CONSULTATION RESPONSES

Apart from the points raised in the above sections, other issues raised are:

- *The land should be used to accommodate a large business that needs office space:* Larger businesses could be accommodated within the development parameters, although it is noted that Core Strategy policy expresses a preference for large scale office occupiers to be located in Harrow Town Centre.
- *Consideration should be given to moving some retail space to the north/east of the site:* This has been reflected in the March amendments to the scheme.
- *What restrictions will be made to prevent residents modifying/extending their properties?:* At reserved matters stage for scale and layout, consideration could be given to removing permitted development rights by condition, so planning permission would be required for

all future extension and material alterations to buildings.

- *There must be a green area that can't be built on:* The proposed link would be designated as open space, which would provide control over future development.
- *New allotments should be provided:* The development zones have the potential to deliver these facilities and this could therefore come forward under reserved matters.
- *Concern about possible future development of Headstone Manor Recreation Ground:* This is not proposed.
- *A world class sports facility should be provided and larger scale leisure facilities should have been considered:* The proposal provides appropriate mitigation for the loss of Zoom Leisure and a contribution would be secured towards improvements to Harrow Leisure Centre.
- *Would result in a loss of property value:* The impact on property values is not a material planning consideration.
- *Concern over site security and boundaries:* The security of the site during building works is not a material planning consideration. Details of boundary treatments for the completed development are required by condition.
- *Would impact on views from existing residential properties:* It is noted that, in the context, protection of a view is not a material planning consideration. Consideration of the impact on outlook has however been undertaken above.
- *Scheme should link with adjacent Waverley Industrial Estate:* There is provision in the masterplan for a future pedestrian link.
- *No indication of bridge over railway line:* This is not proposed, instead it is proposed to improve existing pedestrian links to Wealdstone.
- *Concern about overcrowding on London Midland and Southern train services:* Work presented as part of the Transport Assessment Addendum indicates that there would be capacity on these services to support the additional population of the development.
- *New parking spaces on Headstone Drive (adjacent to shops) should be retained:* Any redesign of the Goodwill junction would seek to retain these spaces and six spaces are proposed within the development to serve this purpose.
- *Bakerloo line should be extended into the site:* This is considered to be unviable and unnecessary.
- *Concern that large numbers of residential dwellings would result in clustering of ethnic minorities:* There is no evidence to suggest that this would occur.
- There is an opportunity to create a new bridge access over Headstone Manor moat: This is outside of the application site and would be likely to be objectionable in heritage terms.
- *The community hall must be able to serve as a theatre, conference centre and local meeting place:* At this stage, it is not clear what functions the community centre will serve, although it will be established through consultation with the Council and local stakeholders.
- *Neighbouring secondary schools are oversubscribed, so which school would link to the proposed?:* This would be a matter for the Council's Education Department. A contribution has been sought towards secondary school expansion.
- *Should ensure that the teaching standards at the proposed school are high:* This is not a material planning consideration.
- *Student accommodation and leisure centre would result in more anti-social behaviour and crime:* There is no evidence to support this assertion.
- *The proposed leisure centre is unnecessary given the nearby Council centre:* The proposed leisure centre would be a small private facility, thereby improving choice. Contributions are to be sought towards improving Harrow Leisure Centre.
- *Leisure facility should have swimming pool and children's pool:* The exact facilities are not clear at this stage, as the application is in outline.

- *Utilities and services would not cope, particularly water consumption:* This would be a matter for the water supplier, who has not objected to the application.
- *The developer should be held responsible for structural faults:* This is not a material planning consideration.
- *Extra population would burden hospitals and libraries:* It would not be reasonable to seek contributions towards hospitals, as these are run and budgeted by the Department of Health. Local libraries are not oversubscribed.
- *New development will create an extra burden on the Council in terms of cleaning, maintenance and security:* The streets and open spaces would not be adopted by the Council and would be maintained in accordance with a scheme to be agreed with the applicant.
- *Concern over impact of Kodak bankruptcy and provision of a guarantee mechanism to ensure that the development proceeds:* The applicant has confirmed that Kodak's bankruptcy in the USA would not affect this development.
- *Will an optic fibre system be laid out?:* It is anticipated that advanced communications infrastructure would be provided to support the new population of residents and workers.
- *An improved police station and ambulance centre is needed:* The proposals include provision for a Metropolitan Police Safer Neighbourhoods Centre. The site is considered to be unsuitable for an ambulance centre.
- *Concerns over covenants:* Covenants are not material planning considerations.

CONCLUSION

This comprehensive proposal has been developed through pre-application and public engagement exercises over the last 24 months. The proposals comprise a mix of "non conforming" land uses, which are being used to "enable" the creation of brand new, employment floor space and provide a net increase in employment opportunities on the site. This principle of enabling development is a recognised within the Core Strategy as being legitimate in appropriate circumstances and reflects an acknowledgement that the existing industrial role of the site has, and is likely to continue, to change in the future. Notwithstanding the protection of the site as a Strategic Industrial location in the development plan, and the protection of the open spaces and sports pitches in national and development plan policy, the proposals, alongside the mitigation measures and controls are, overall, considered to result in the delivery of positive, long term benefits for the Borough that are consistent with the sites location within the Heart of Harrow, Area for Intensification.

The application material, including the Environmental Information contained within the Environmental Statement, traffic assessment and Retail assessment demonstrate that the quantum, type, scale, density and mix of uses can be achieved, subject to suitable controls (including off site infrastructure provide through S106 agreement) without significantly harming environmental, amenity and economic conditions in the borough.

Officers have engaged with and considered carefully the representations from those likely to be affected by the proposals and, in partnership with the applicants, have sought to identify ways of addressing or mitigating such impacts to an acceptable level. Concerns surrounding transport impacts on the surrounding road network in particular, are proposed to be addressed by a comprehensive funding package that will enable a suite of measures.

Subject to appropriate conditions and contributions to mitigate the impacts identified on Wealdstone and upon nearby stores, the retail supermarket and the smaller comparison goods units in this out of centre location is considered to be acceptable as a means to enable the wider economic and regeneration outcomes that the emerging Area Action Plan

envisages for the site. Complementary health and education uses are also proposed to mitigate the demands placed on existing health, community and education infrastructure that would be affected by the development. The proposed space for a new primary school, meanwhile, would make a wider strategic contribution to the education needs on the future, across the borough.

The changes to the open space, to enable its reformatting and re-provision to create a green link through the site (with appropriate reservoirs to ensure that at no time is there a net loss of opens space) is considered to meet the requirements of the development plan to maintain the boroughs stock of open space. The loss of sports pitches is compensated for by financial contributions intended to deliver qualitative enhancements and increased carrying capacity at strategic sports pitches located within a convenient travel distance from the site and notwithstanding Sport England's objection to the proposals, is considered to be appropriate to ensure that the needs of sport in the borough are not undermined.

Whilst some elements of the proposals are not, in isolation, supported by the policy framework that developed over the last 2 years, having regard to the significant, economic and regeneration benefits derived through the development, the potential environmental and physical effects of the development (and their scope for mitigation) and the provisions of the NPPF and the adopted and emerging development plan documents, the proposals are nevertheless considered to represent a viable, and on balance acceptable form of development. Subject to the appropriate referral of these proposals to the Mayor of London, and to the Secretary of State, and the prior completion of a S.106 agreement, the application should accordingly be approved.

CONDITIONS

COMMENCEMENT

1 The development shall be begun not later than three years from the date of this permission or two years from the final approval of the first Reserved Matters application, whichever is the later.
Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).

2 This permission shall lapse unless the first Reserved Matters application is made within two years of the date of this permission.
Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).

APPROVAL OF RESERVED MATTERS

3 Approval of the details shown below (the Reserved Matters) for each phase of development shall be obtained from the local planning authority in writing before any development in that phase is commenced:
a) layout
b) scale
c) appearance
d) access
e) landscaping
Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).

4 No later than ten years following the date of this permission, an application or

applications shall have been submitted to the local planning authority for the approval of Reserved Matters in respect of all the built accommodation in the development hereby permitted.
Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).

5 No Reserved Matters approval shall be implemented more than twelve years from the date of this permission or two years from the date of the final approval of any Reserved Matters application, whichever is the later.
Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).

PHASING

6 Notwithstanding the phasing of the development hereby approved, a scheme to be submitted and approved in writing by the local planning authority prior to commencement of each phase of the development hereby permitted, a detailed Phasing Strategy. This document shall explain how:
(a) the energy centre hereby approved is to be brought forward as part of phase 1 of the development;
(b) the land in Zone P will be serviced and made available for the provision of the primary school prior to occupation of phase 1B; and
(c) the proposed community centre in Zone A, phase 1A (serviced land) and community centre/café/chimney in Zone F, phase 3, are to be provided.

The Phasing Strategy shall be implemented as approved.
Reason: To ensure that the development contributes adequately towards the mitigation of the impacts of the development in terms of education, community facilities and sustainable energy generation, in line with the principles set out in the approved Energy Statement, in accordance with the NPPF, London Plan (2011) policies 3.18, 5.2, 5.3, 5.5, 5.6, 5.7, 5.10 and 5.11, Core Strategy (2012) policy CS1 and the Harrow and Wealdstone Area Action Plan (Pre-Submission Consultation Draft).

7 Prior to commencement of the development hereby permitted, a plan linking the delivery of employment space (use classes B1, B2 and B8) to the completion of residential units within the development shall be submitted and approved in writing by the local planning authority. This plan shall be implemented as approved and reviewed every two years following initial approval.
Reason: To ensure that an appropriate minimum amount of employment space is provided as part of the development in order to maximise the delivery of employment opportunities, in line with the requirements of London Plan (2011) policy 2.17, Core Strategy (2012) policy CS1 and the Harrow and Wealdstone Area Action Plan (Preferred Option Consultation).

DEVELOPMENT TO BE CARRIED OUT IN ACCORDANCE WITH PERMISSION

8 The development hereby permitted shall be carried out in accordance with the following approved plans and documents:
- Parameter Plans: HV(00)AP101 (14.05.2012), HV(00)AP102 (14.05.2012), HV(00)AP103 (14.05.2012), HV(00)AP104 (14.05.2012), HV(00)AP105 (14.05.2012), HV(00)AP106 (14.05.2012) and HV(00)AP106A.
- Application Plans: HV(00)AP001, HV(00)AP002, HV(00)AP003 (20.03.2012) and HV(00)AP004.
- Design Guidelines (May 2012).

- Development Specification (March 2012).

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

PARTICULARS TO ACCOMPANY RESERVED MATTERS APPLICATIONS

9 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, scale, appearance and landscaping shall be accompanied by an urban design report which explains the approach to the design and how it addresses the relevant Design Guidelines. This document should also include measures to minimise the risk of crime in a visually acceptable manner and meet the specific security needs of that phase of development.

Reason: To ensure good design throughout the development in line with the principles set out in the approved Design Guidelines (May 2012), including protection of the setting of Headstone Manor and the character and appearance of the wider area, including local views, in accordance with the Environmental Impact Assessment, in line with the objectives of the NPPF, London Plan (2011) policies 7.4, 7.5, 7.6 and 7.8, Core Strategy (2012) policy CS1, the Harrow and Wealdstone Area Action Plan (Preferred Option Consultation), saved UDP policies D4, D9 and D11 and Section 17 of the Crime & Disorder Act 1998

10 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, scale and appearance shall be accompanied by a detailed Energy Strategy. The Energy Strategy shall explain:

(a) how the proposed building design(s) realise(s) opportunities to include design and technology energy efficiency measures;
(b) the reduction in carbon emissions achieved through these building design and technology energy efficiency measures, compared with the emissions permitted under the national Building Regulations prevailing at the time the application(s) for approval of Reserved Matters are submitted;
(c) the specification for any green and/or brown roofs;
(d) how energy shall be supplied to the building(s), highlighting;
    i. how the building(s) relate(s) to the site-wide strategy for district heating incorporating tri-generation from distributed combined heat and power; and
    ii. any other measures to incorporate renewables.
(e) how the building(s) have been designed to achieve at least the minimum requirement under BREEAM or Code for Sustainable Homes (or an equivalent assessment method and rating) prevailing at the time the application(s) for approval of Reserved Matters are submitted; and
(f) preparation of a Site Waste Management Plan (SWMP), to comply with Best Practice Standards.

Reason: To ensure that the development contributes to climate change mitigation by meeting the highest standards of sustainable design and construction and achieving an adequate reduction in carbon dioxide emissions from onsite renewable generation, in accordance with the Environmental Impact Assessment, in line with the principles set out in the approved Energy Statement, in accordance with the NPPF, London Plan (2011) policies 5.2, 5.3, 5.5, 5.6, 5.7, 5.10 and 5.11, Core Strategy (2012) policy CS1 and the Harrow and Wealdstone Area Action Plan (Preferred Option Consultation).

11 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, scale, appearance and landscaping of the public realm shall be accompanied by a detailed Ecology and Biodiversity Strategy. The Ecology and

Biodiversity Strategy shall explain:

(a) the incorporation of bird boxes, bat roosts and other wildlife features on buildings;
(b) the creation of wildlife habitats within the public realm, integrated into the detailed SUDS designs (i.e. standing and running water, grassland, log piles, green/brown roofs); and
(c) the management arrangements for these features.

Reason: To ensure that the development contributes to improving the ecology and biodiversity of the area, in accordance with the Environmental Impact Assessment, in accordance with the NPPF, London Plan (2011) policy 7.19, Core Strategy (2012) policy CS1, the Harrow and Wealdstone Area Action Plan (Preferred Option Consultation) and saved UDP policy EP26.

12 Applications for approval of Reserved Matters submitted pursuant to this permission shall be accompanied by a detailed Construction Environmental Management Plan (CEMP). This document shall explain:

(a) the proposed Best Practice Measures (BPM) to be implemented during construction to suppress dust and minimise noise and vibration associated with demolition/building works;
(b) a full detailed noise and vibration assessment;
(c) the measures proposed to reduce and remove risks to the water environment and reduce flood risk during construction;
(d) a full Construction Logistics Plan, which demonstrates how the impact of construction vehicles would be minimised;
(e) details of proposed hours of work for construction activity; and
(f) a summary of how the measures proposed address the mitigation identified in the Environmental Impact Assessment.

Reason: To ensure that the development contributes to climate change mitigation by meeting the highest standards of sustainable design and construction and achieving an adequate reduction in carbon dioxide emissions from onsite renewable generation, in accordance with the Environmental Impact Assessment, in line with the principles set out in the approved Energy Statement, in accordance with the NPPF, London Plan (2011) policies 5.2, 5.3, 5.5, 5.6, 5.7, 5.10 and 5.11, Core Strategy (2012) policy CS1 and the Harrow and Wealdstone Area Action Plan (Preferred Option Consultation).

13 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, scale and appearance (excluding where housing is not proposed) shall be accompanied by a detailed Housing Schedule. This document shall explain:

(a) the type and mix of units proposed;
(b) whether the units are to be provided as affordable or not and if so what tenure;
(c) the gross internal floor areas of each dwelling;

Reason: To ensure that the development provides an appropriate mix and quality of housing, as well as providing an appropriate amount and mix of affordable housing having regard to the relevant viability assessment, in accordance with the NPPF, London Plan (2011) policies 3.5, 3.8 and 3.12, Core Strategy (2012) policy CS1 and the Harrow and Wealdstone Area Action Plan (Preferred Option Consultation).

14 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout and scale shall be accompanied by a detailed Daylight and Sunlight Assessment. This document shall explain:

(a) the impact of the proposed development on daylight and sunlight to neighbouring properties;
(b) the impact of the proposed development on daylight and sunlight to properties within

the development itself;

Reason: To ensure that the development has an acceptable impact on neighbouring residents and future occupiers in terms of daylight and sunlight, in line with the recommendations set out in the submitted Daylight Sunlight report, in accordance with saved UDP policy D5.

15 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout and landscaping shall be accompanied by a detailed Surface Water Drainage Strategy. This document shall explain:

(a) the proposed use of Sustainable Urban Drainage Systems (SUDS) to manage surface water run-off, including the provision of soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands;
(b) surface water attenuation, storage and disposal works, including relevant calculations;
(c) works for the disposal of sewage associated with the development.

Reason: To ensure that the development has adequate drainage facilities, to reduce and mitigate the effects of flood risk, in accordance with the Environmental Impact Assessment, in line with the recommendations of Core Strategy (2012) policy CS1 and the NPPF.

16 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, access and landscaping shall be accompanied by a detailed Accessibility Strategy. This document shall explain:

(a) how the proposed public realm areas would be accessible to all, including details of finished site levels, surface gradients and lighting;
(b) how each non-residential building would be accessible to all, including details of level access and internal accommodation arrangements;
(c) that each of the residential dwellings would comply with Lifetime Homes standards, with 10% Wheelchair Homes compliance.

Reason: To ensure that the development is accessible and inclusive to all, in line with the recommendations of London Plan (2011) policies 3.8 and 7.2, Core Strategy (2012) policy CS1 and the Harrow and Wealdstone Area Action Plan (Preferred Option Consultation).

17 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, access, appearance and landscaping shall be accompanied by a detailed Lighting Strategy in line with the Code of Practice for the Reduction of Light Pollution issued by the Institute of Lighting Engineers. This document shall explain:

(a) the lighting proposed for public realm areas and streets, including relevant justification;
(b) the proposed external building lighting.

Reason: To ensure that the development is adequately lit in order to minimise the risk and fear of crime, whilst ensuring that the proposed lighting would not unduly impact on local character, amenity or biodiversity, in line with the recommendations of London Plan (2011) policies 7.3 and 7.19, Core Strategy (2012) policy CS1 and the Harrow and Wealdstone Area Action Plan (Preferred Option Consultation).

18 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, access and landscaping shall be accompanied by a detailed Refuse Strategy. This document shall explain:

(a) the storage and disposal arrangements for refuse and waste associated with private buildings, including vehicular access thereto;

(b) the storage and disposal arrangements for refuse and waste associated with proposed public realm areas, including vehicular access thereto;
(c) the hours of proposed waste collection; and
(d) the proposed Waste Management Plan for public realm areas.

Reason: To ensure that adequate refuse storage and disposal facilities are provided, in the interests of local character and amenity, in line with the recommendations of Core Strategy (2012) policy CS1 and the Harrow and Wealdstone Area Action Plan (Preferred Option Consultation).

19 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, scale and appearance (excluding phase 1B) shall be accompanied by a detailed Noise and Vibration Mitigation Strategy. This document shall explain noise attenuation measures for the proposed uses, including noise barriers, specified glazing and ventilation and orientation/layout of buildings and amenity areas.
Reason: To ensure that the new buildings in the development have adequate provision against noise and vibration from existing sources and new sources within the development, in accordance with the Environmental Impact Assessment, in line with the recommendations of the NPPF, London Plan (2011) policy 7.15, Core Strategy (2012) policy CS1 and saved UDP policy EP25.

20 Applications for approval of Reserved Matters submitted pursuant to this permission shall be accompanied by a detailed Arboricultural Report. This document shall explain how the trees outlined in purple on the Application Plan HV(00)AP003 (20.03.2012) are to be retained, together with measures for their protection during the course of the development. If any trees outlined in purple on the Application Plan HV(00)AP003 (20.03.2012) are to be removed, lopped or topped, a full justification must be provided within the Arboricultural Report. This document shall also explain the total numbers of trees to be removed, together with details of proposed replacement tree planting, to ensure an overall increase in the number of trees across the site.
Reason: To safeguard the character and appearance of the area and to enhance the appearance of the development, in line with the requirements of London Plan (2011) policy 7.21, Core Strategy (2012) policy CS1 and saved UDP policy D10.

21 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout and landscaping shall explain the approach to the landscaping of the specific part of the site in relation to the landscape principles set out in the Design and Access Statement and Design Guidelines, including planting plans, a schedule of plants, including plant sizes and proposed numbers, as well as details of hard landscape materials, boundary treatments and street furniture.
Reason: To safeguard the character and appearance of the area and to enhance the appearance of the development, in accordance with the Design and Access Statement and Design Guidelines, in line with the requirements of Core Strategy (2012) policy CS1, saved UDP policy D9 and the Harrow and Wealdstone Area Action Plan (Preferred Option Consultation).

22 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout and access shall be accompanied by a detailed Transport Strategy. This document shall explain:
(a) a detailed Parking Management Strategy for that part of the development (including car club provision);
(b) details of cycle parking provision for each of the proposed uses;
(c) details electric car charging points;

(d) details of pickup and drop off facilities for the primary school (in applications relating to the primary school only);
(e) details of motorcycle and scooter parking;
(f) details of pedestrian and cycle routes throughout that part of the scheme and how this relates to the overall site-wide approach as set out in the Design Guidelines;
(g) details of pedestrian and vehicle signage and wayfinding within the development;
(h) details of enforcement procedures for parking offences on unadopted roads;
(i) a full multi-storey car park management plan;
(j) a summary of how the approach relates to the original Transport Assessment; and
(k) a summary of how the proposed Strategy relates to the Travel Plan to be submitted under the S.106 agreement.

Reason: To ensure that adequate levels of parking are proposed, that sustainable means of transport are encouraged and to ensure that no unacceptable increase in traffic movements result, in line with the recommendations of the Transport Assessment and Environmental Impact Assessment, in accordance with the NPPF, London Plan (2011) policies 6.3 and 6.13, Core Strategy (2012) policy CS1 and saved UDP policy T6.

23 Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, scale, appearance and landscaping shall be accompanied by a detailed Heritage Impact Assessment. This document shall explain how the proposed development addresses the setting and special interest of the heritage assets on and off the site.

Reason: To ensure that the development preserves or enhances the setting and special interest of heritage assets on the site and elsewhere, in accordance with the Environmental Impact Assessment, in accordance with the NPPF, London Plan (2011) policy 7.8, Core Strategy (2012) policy CS1 and saved UDP policy D11 and D14.

24 Applications for approval of Reserved Matters submitted pursuant to this permission shall be accompanied by a detailed Levels Plan. This document shall explain details of the levels of the buildings, roads and footpaths in relation to the adjoining land and highway(s), and any other changes proposed in the levels of the site.

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 land contamination, in accordance with the Environmental Impact Assessment, in accordance with the NPPF, London Plan (2011) policy 5.21, Core Strategy (2012) policy CS1 and saved UDP policy EP12.

OPEN SPACE

25 Prior to the commencement of phase 1B of the development hereby permitted, a detailed Open Space Strategy for the provision of open space on completion of phase 1 of the development shall be submitted and approved by the local planning authority. The proposed open space should be at least 52,310sqm in area and, where the open space does not form part of the permanent areas of public realm (dealt with under the requirements of condition 20) the Strategy shall be accompanied by full details of the proposed approach to the landscaping of the temporary open space, including planting plans, a schedule of plants, including plant sizes and proposed numbers, as well as details of hard landscape materials, boundary treatments and street furniture. The development shall be carried out in accordance with the Open Space Strategy prior to first occupation of any part of phase 1 of the development and thereafter retained until completion of the open space in phase 3 of the development.

Reason: To ensure adequate re-provision of open space within the development, to

safeguard the character and appearance of the area and to enhance the appearance of the development, in accordance with the Design and Access Statement and Design Guidelines, in line with the requirements of Core Strategy (2012) policy CS1, saved UDP policy D9 and the Harrow and Wealdstone Area Action Plan (Preferred Option Consultation).

26 Prior to first occupation of any phase of the development hereby permitted, a Public Realm Management Plan shall be submitted and approved by the local planning authority for that phase of development. This document shall include:
(a) details of the contractual arrangement between the developer and the management company;
(b) details of a scheme for waste management in the public realm;
(c) details of proposals for landscape management in the public realm, including long term objectives, responsibilities and maintenance schedules for all public realm areas; and
(d) a maintenance and management plan for the non-adopted drains and SUDS systems.
The Public Realm Management Plan shall be implemented as approved.
Reason: To ensure that the public realm within the development is maintained to an adequate standard, to safeguard the character and appearance of the area and to enhance the appearance of the development, in accordance with the Design and Access Statement and Design Guidelines, in line with the requirements of Core Strategy (2012) policy CS1, saved UDP policy D9 and the Harrow and Wealdstone Area Action Plan (Preferred Option Consultation).

RETAIL

27 The maximum amount of sales floorspace in the proposed food store hereby permitted shall not exceed 2,800sqm net.
Reason: In the interests of the vitality and viability of nearby shopping centres and neighbourhood parades, in line with the requirements of the NPPF and London Plan policy 4.7.

28 The maximum amount of comparison sales floorspace permitted in the proposed food store hereby permitted shall not exceed 560sqm net.
Reason: In the interests of the vitality and viability of nearby shopping centres and neighbourhood parades, in line with the requirements of the NPPF and London Plan policy 4.7.

29 The food store hereby permitted shall not include the following concessions or franchises: a post officer counter, hairdressers/barbers, dry cleaners, bank or optician.
Reason: In the interests of the vitality and viability of nearby shopping centres and neighbourhood parades, in line with the requirements of the NPPF and London Plan policy 4.7.

AMENITY AND NOISE

30 Before each B2 use within development hereby permitted commences operation a scheme shall be agreed with the local planning authority which specifies the provisions to be made for the control of noise and vibration emanating from that B2 use.

The scheme shall ensure that the total rating level of the noise emitted from the combined B2 uses within the site shall not exceed the existing background noise levels

determined to be LA90 48.7dB during weekday daytimes (07.00 hours to 23.00 hours Monday to Friday inclusive) and LA90 46.8dB at any other time. The noise levels shall be determined at the nearest noise-sensitive premises within zone J of the proposed development. The measurements and assessment shall be made according to BS 4142:1997.
Reason: To ensure that occupiers of the new buildings in the development would not experience undue noise and disturbance from the proposed B2 uses, in accordance with the Environmental Impact Assessment, in line with the recommendations of the NPPF, London Plan (2011) policy 7.15, Core Strategy (2012) policy CS1 and saved UDP policy EP25.

31 Deliveries to and from the food store hereby permitted shall only take place between 07.00 hours and 22.00 hours on any day.
Reason: To ensure that occupiers of the new residential dwellings in the development would not experience undue noise and disturbance from deliveries to the food store, in line with the recommendations of the NPPF, London Plan (2011) policy 7.15, Core Strategy (2012) policy CS1 and saved UDP policy EP25.

TRANSPORT

32 No vehicle access shall be provided to any development approved on the Harrow View West site from Fairfield Drive, Edward Road or Sidney Road at any time. Prior to commencement of phase 1B of the development hereby approved, a scheme to prevent vehicle access from these roads (e.g. bollards or barriers) shall be submitted and approved in writing by the local planning authority. The scheme shall be implemented as approved prior to occupation of any property in phase 1B and thereafter retained.
Reason: To accord with the Transport Assessment, Development Specification and Parameter Plans and to ensure that neighbouring occupiers do not experience an unforeseen increase in traffic movements, in line with the recommendations of the NPPF, London Plan (2011) policy 6.3, Core Strategy (2012) policy CS1 and saved UDP policy T6.

HERITAGE AND ARCHAEOLOGY

33 A) No development shall take place in each development phase until the applicant has secured the implementation of a programme of archaeological mitigation in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority.
B) No development or demolition shall take place in each development phase other that in accordance with the Written Scheme of Investigation approved under Part (A).
C) Each phase of development shall not be occupied until the site investigation and post investigation assessment for that phase has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Part (A), and the provision made for analysis, publication and dissemination of the results and archive deposition has been secured.
Reason: Heritage assets of archaeological interest survive on the site. The planning authority wishes to secure the provision of archaeological investigation and the subsequent recording of the remains prior to development, in accordance with the Environmental Impact Assessment and recommendations given by the borough, the NPPF, London Plan policy 7.8 and Core Strategy policy CS1.

34 A) No development shall take place in each development phase until the applicant has secured the implementation of a programme of archaeological recording of the standing

historic buildings in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority.
B) No development or demolition shall take place in each development phase other than in accordance with the Written Scheme of Investigation approved under Part (A).
C) Each phase of development shall not be occupied until the site investigation and post investigation assessment for that phase has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Part (A), and the provision made for analysis, publication and dissemination of the results and archive deposition has been secured.
Reason: Heritage assets of archaeological interest survive on the site. The planning authority wishes to secure the provision of archaeological investigation and the subsequent recording of the remains prior to development, in accordance with the Environmental Impact Assessment and recommendations given by the borough, the NPPF, London Plan policy 7.8 and Core Strategy policy CS1.

LAND CONTAMINATION AND REMEDIATION

35 Prior to the commencement of each phase of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the local planning authority), the following components of a scheme to deal with the risks associated with contamination of that part of the site shall each be submitted to and approved, in writing, by the local planning authority:
1) A site investigation scheme, based on the Preliminary Risk Assessment, to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
2) The results of the site investigation and detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
3) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.
Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.
Reason: To protect groundwater and future end users of the site, in accordance with the Environmental Impact Assessment and in line with the requirements of the NPPF and London Plan policy 5.21. Information submitted so far has identified contaminants on site and further work has been proposed which needs to be completed.

36 Prior to occupation of buildings in each phase of development, a verification report demonstrating completion of the works set out in the approved remediation strategy for that phase and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a 'long-term monitoring and maintenance plan') for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the local planning authority. The long-term monitoring and maintenance plan shall be implemented as approved.
Reason: To protect groundwater and future end users of the site, in accordance with the Environmental Impact Assessment and in line with the requirements of the NPPF and London Plan policy 5.21. This condition ensures that any verification works identified in the plan are successfully carried out.

37 Piling of any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.
Reason: To protect groundwater and future end users of the site, in accordance with the Environmental Impact Assessment and in line with the requirements of the NPPF and London Plan policy 5.21. Piling, to facilitate building foundations, has the potential to create a pathway between contaminated shallow soils and deeper geological formations and aquifers.

38 In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be, and where remediation is necessary a remediation scheme must be prepared, which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority.
Reason: To protect groundwater and future end users of the site, in accordance with the Environmental Impact Assessment and in line with the requirements of the NPPF and London Plan policy 5.21.

FLOOD RISK AND DRAINAGE

39 The development permitted by this planning permission shall only be carried out in accordance with the approved FRA, dated December 2011 reference C-RPT-HVD003 Version 5 by Halcrow Group Limited, and the following mitigation measures detailed within the FRA:
1) Limit surface water run-off to greenfield run-off rates for all storm events up to and including the 1 in 100 year storm event, with an appropriate allowance for climate change.
2) Provide of on site surface water storage to accommodate all events up to and including the critical duration 1 in 100 year storm event, with an allowance for climate change.
3) Achieve surface water storage using sustainable drainage techniques including green roofs, ponds, swales and permeable paving.
Reason: To ensure surface water flood storage is achieved using appropriate sustainable drainage techniques. To also prevent flooding on site and elsewhere by ensuring the satisfactory storage of/disposal of surface water from the site, in accordance with the Environmental Impact Assessment and in line with the NPPF and Core Strategy policy CS1.

ECOLOGY AND BIODIVERSITY

40 Prior to the commencement of development in phase 1B a scheme for the provision and safeguarding of a five metre buffer zone alongside the Yeading Brook Headstone Park Branch shall be submitted to and agreed in writing by the local planning authority. Thereafter the development shall be carried out in accordance with the approved scheme and any subsequent amendments shall be agreed in writing with the local planning authority. The scheme shall include:
- Plans showing the extent and layout of the buffer zone adjacent to the length of the Yeading Brook Headstone Park Branch.

- Details of the native species planting scheme.
- Details demonstrating how the buffer zone will be protected during development and managed/maintained over the longer term.
- Details of any footpaths, fencing, lighting etc.

Reason: To protect and enhance the ecological value of the watercourse and its corridor. An undeveloped buffer zone adjacent to a watercourse corridor is supported by Harrow's Strategic Flood Risk Assessment (SFRA) (section 9.3 and table 10). River restoration is supported within the SFRA and London Plan policy 7.28.

41 No demolition of buildings or removal of trees or shrubs shall take place between the months of February to September inclusive, unless otherwise agreed in writing by the local planning authority.
Reason: To safeguard the ecology and biodiversity of the area, in accordance with the Environmental Impact Assessment and in line with the requirements of the NPPF, London Plan policy 7.19 and Core Strategy policy CS1.

42 No demolition of buildings or removal of trees or shrubs shall take place in any phase of development hereby permitted until up to date bat and breeding bird surveys are submitted and approved by the local planning authority for that phase of development. If evidence of bat or breeding birds are found prior to demolition, specific mitigation measures should be included in any submission for the written approval of the local planning authority. Development shall proceed in accordance with any approved mitigation measures.
Reason: To safeguard the ecology and biodiversity of the area, in accordance with the Environmental Impact Assessment and in line with the requirements of the NPPF, London Plan policy 7.19 and Core Strategy policy CS1.

TELECOMMUNICATIONS

43 Prior to the commencement of each phase of the development hereby permitted, a strategy for the provision of equipment for wireless telecommunications (including 3G and 4G) to serve the residential and working population of the site shall be submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved strategy.
Reason: To ensure that appropriate telecommunications equipment is embedded into the development without adversely affecting the character and appearance of the development, in line with the requirements of the NPPF and Core Strategy policy CS1.

INFORMATIVES

1 REASON FOR GRANT OF PLANNING PERMISSION

The local planning authority considers that the principle of a comprehensive mixed use development on this site to provide a net additional amount of employment within the borough, enabled by a mix of new uses, including residential uses, is acceptable, notwithstanding the identified SIL and open space allocations for the site within the development plan.

The application material, including the Environmental Information contained within the Environmental Statement, Traffic Assessment and Retail Statement demonstrate that the quantum, type, scale, density and mix of uses can be achieved, subject to suitable controls (including off site infrastructure provide through the S.106 agreement) without significantly harming environmental, amenity and economic conditions in the borough.

Subject to appropriate conditions and contributions to mitigate the impacts identified on

Wealdstone and upon nearby stores, the retail supermarket, in this out of centre location, is considered to be acceptable as a means to enable the wider economic and regeneration outcomes that the emerging Area Action Plan envisages for the site, as part of the Area for Intensification within the development plan.

The changes to the open space, to enable its reformatting and re-provision to create a green link through the site (with appropriate reservoirs to ensure that at no time is there a net loss of opens space) is considered to meet the requirements of the development plan to maintain the boroughs stock of open space. The loss of sports pitches is compensated for by financial contributions intended to deliver qualitative enhancements and increased carrying capacity at strategic sports pitches located within a convenient travel distance from the site and notwithstanding Sport England's objection to the proposals, is considered to be appropriate to ensure that the needs of sport in the borough are not undermined. Complementary health and education uses are also proposed to mitigate the demands placed on existing health, community and education infrastructure that would be affected by the development.

Having regard to the significant, economic and regeneration benefits derived through the development, the potential environmental and physical effects of the development (and their scope for mitigation) and the provisions of the NPPF and the adopted and emerging development plan documents, the proposals are considered to represent a viable, and on balance acceptable form of development, having regard to all material considerations – including the representations received through the consultation process.

The following policies in the NPPF, London Plan, Core Strategy and Harrow Unitary Development Plan are relevant to this decision:

National Planning Policy and Guidance:
National Planning Policy Framework (2012) (NPPF)
Planning for Town Centres: Practice Guidance on Need, Impact and the Sequential Approach (2009)

The London Plan (2011):
2.13 – Opportunity Areas and Intensification Areas
2.15 – Town Centres
2.17 – Strategic Industrial Locations
2.18 – Green Infrastructure: The Network of Open and Green Spaces
3.1 – Ensuring Equal Life Chances for All
3.2 – Improving Health and Addressing Health Inequalities
3.3 – Increasing Housing Supply
3.4 – Optimising Housing Potential
3.5 – Quality and Design of Housing Developments
3.6 – Children and Young People's Play and Informal Recreation Facilities
3.7 – Large Residential Developments
3.8 – Housing Choice
3.9 – Mixed and Balanced Communities
3.11 – Affordable Housing Targets
3.12 – Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes
3.13 – Affordable Housing Thresholds
3.16 – Protection and Enhancement of Social Infrastructure
3.17 – Health and Social Care Facilities
3.18 – Education Facilities

3.19 – Sports Facilities
4.5 – London's Visitor Infrastructure
4.6 – Support for and Enhancement of Arts, Culture, Sport and Entertainment Provision
4.7 – Retail and Town Centre Development
4.8 – Supporting a Successful and Diverse Retail Sector
4.9 – Small Shops
4.10 – New and Emerging Economic Sectors
4.12 – Improving Opportunities for All
5.2 – Minimising Carbon Dioxide Emissions
5.3 – Sustainable Design and Construction
5.6 – Decentralised Energy in Development Proposals
5.7 – Renewable Energy
5.9 – Overheating and Cooling
5.10 – Urban Greening
5.11 – Green Roofs and Development Site Environs
5.12 – Flood Risk Management
5.13 – Sustainable Drainage
5.15 – Water Use and Supplies
5.21 – Contaminated Land
6.3 – Assessing Effects of Development on Transport Capacity
6.9 – Cycling
6.10 – Walking
6.12 – Road Network Capacity
6.13 – Parking
7.1 – Building London's Neighbourhoods and Communities
7.2 – An Inclusive Environment
7.3 – Designing Out Crime
7.4 – Local Character
7.5 – Public Realm
7.6 – Architecture
7.8 – Heritage Assets and Archaeology
7.13 – Safety, Security and Resilience to Emergency
7.14 – Improving Air Quality
7.15 – Reducing Noise and Enhancing Soundscapes
7.17 – Metropolitan Open Land
7.18 – Protecting Local Open Space and Addressing Local Deficiency
7.19 – Biodiversity and Access to Nature
7.21 – Trees and Woodlands
Supplementary Planning Guidance: Industrial Capacity (2008)
Draft Supplementary Planning Guidance: Land for Industry and Transport (February 2012)

Local Development Framework Core Strategy and Area Action Plan
Local Development Framework: Harrow Core Strategy (2012)
Harrow and Wealdstone Area Action Plan: Pre-Submission Consultation Document (2012)
Evidence Base Documents
Retail Study Review (2009)
Employment Land Review (2010)
Strategic Flood Risk Assessment (2009)
Draft Harrow Views Assessment (2012)
Open Space PPG17 Study (2011)
Draft Outdoor Sports Strategy (2012)

London Borough of Harrow Unitary Development Plan (2004):
EP12 – Control of Surface Water Run-Off
EP15 – Water Conservation
EP22 – Contaminated Land
EP25 – Noise
EP26 – Habitat Creation and Enhancement
EP27 – Species Protection
EP43 – Green Belt and Metropolitan Open Land Fringes
EP47 – Open Space
D4 – The Standard of Design and Layout
D5 – New Residential Development – Amenity Space and Privacy
D9 – Streetside Greenness and Forecourt Greenery
D10 – Trees and New Development
D11 – Statutorily Listed Buildings
D19 – Ancient Monuments
D20/D21/D22 – Sites of Archaeological Importance
D31 – Views and Landmarks
T6 – The Transport Impact of Development Proposals
T12 – Reallocating Available Roadspace and Managing Traffic
T13 – Parking Standards
T15 – Servicing of New Developments
H7 – Dwelling Mix
H14 – Residential Institutions
EM6 – Limiting Goods Sold at Out or Edge of Centre Developments
EM9 – Variety of Unit Sizes
EM12 – Small Industrial Units and Workshops
EM14 – Land and Buildings in Business, Industrial and Warehousing Use – Designated Areas
EM22 – Environmental Impact of New Business Development
EM25 – Food, Drink and Late Night Uses
R4 – Outdoor Sports Facilities
R7 – Footpaths, Cyclepaths and Bridleways
R8 – Play Areas
R11 – Protecting Arts, Culture, Entertainment and Leisure Facilities
R13 – Leisure Facilities
C2 – Provision of Social and Community Facilities
C7 – New Education Facilities
C8 – Health Care and Social Services
C10 – Community Buildings and Places of Worship
C16 – Access to Buildings and Public Spaces
C17 – Access to Leisure, Recreation, Community and Retail Facilities
Supplementary Planning Document: Sustainable Building Design (2009)
Supplementary Planning Document: Accessible Homes (2010)
Supplementary Planning Document: Access For All (2006)
Supplementary Planning Document: Residential Design Guide (2010)

2 COMMUNITY INFRASTRUCTURE LEVY

Please be advised that approval of this application (either by Harrow Council, or subsequently by PINS if allowed on Appeal following a Refusal by Harrow Council) will attract a liability payment of £1,585,955 of Community Infrastructure Levy. This charge has been levied under Greater London Authority CIL charging schedule and S211 of the Planning

Act 2008.

Harrow Council as CIL collecting authority on commencement of development will be collecting the Mayoral Community Infrastructure Levy (CIL).
Your proposal is subject to a CIL Liability Notice indicating a levy of £1,585,955 for the application, based on the levy rate for Harrow of £35/sqm and the stated increase in floorspace of sqm
You are advised to visit the planningportal website where you can download the appropriate document templates.
http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil

3 COMPLIANCE WITH PLANNING CONDITIONS
IMPORTANT: 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.

Plan Nos: HV(00)AP101 (14.05.2012), HV(00)AP102 (14.05.2012), HV(00)AP103 (14.05.2012), HV(00)AP104 (14.05.2012), HV(00)AP105 (14.05.2012), HV(00)AP106 (14.05.2012), HV(00)AP106A, HV(00)AP001, HV(00)AP002, HV(00)AP003 (20.03.2012), HV(00)AP004, Design Guidelines (May 2012), Development Specification (March 2012).

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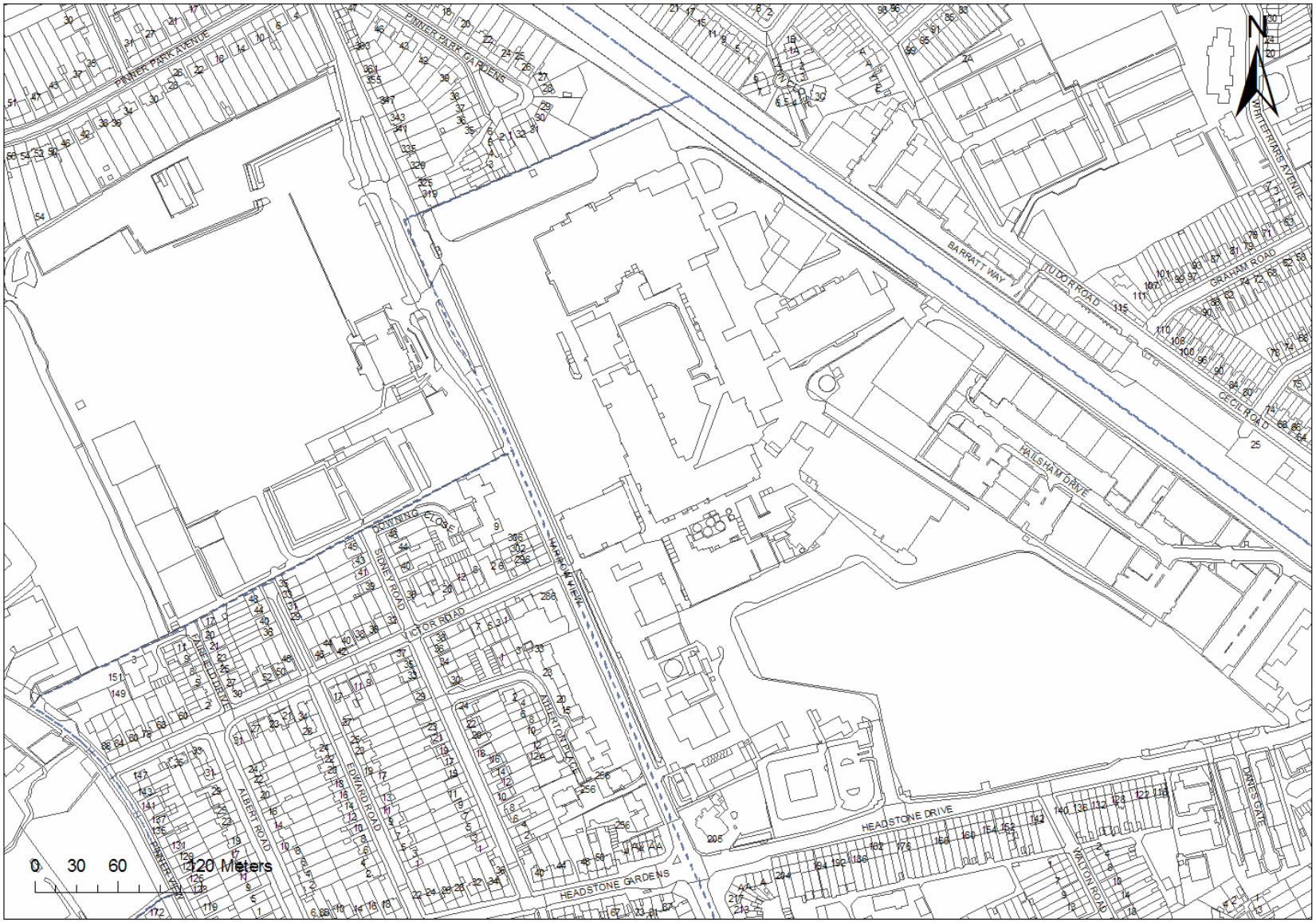

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Harrow COUNCIL LONDON

SECTION 2 - OTHER APPLICATIONS RECOMMENDED FOR GRANT

None.

SECTION 3 - OTHER APPLICATIONS RECOMMENDED FOR REFUSAL

None.

SECTION 4 - CONSULTATIONS FROM NEIGHBOURING AUTHORITIES

None.

SECTION 5 - PRIOR APPROVAL APPLICATIONS

None.