

Planning Committee Agenda

Date: Wednesday 20 January 2021

Time: 6.30 pm

Venue: Virtual Meeting - Online

There is no scheduled site visit for Planning Committee Members.

The date and time for the briefing for Planning Committee Members will be communicated later.

Membership (Quorum 3)

Chair: Councillor Sachin Shah

Labour Councillors: Ghazanfar Ali (VC)
Simon Brown
Keith Ferry

Conservative Councillors: Marilyn Ashton
Christopher Baxter
Anjana Patel

Labour Reserve Members:

1. Christine Robson
2. Ajay Maru
3. Peymana Assad
4. Kiran Ramchandani

Conservative Reserve Members:

1. Bharat Thakker
2. Norman Stevenson
3. Ameet Jogia

Contact: Mwim Chellah, Senior Democratic & Electoral Services Officer
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Scan this code for the electronic agenda:



Useful Information

Meeting details

This meeting is open to the press and public and can be viewed on www.harrow.gov.uk/virtualmeeting

Filming / recording of meetings

Please note that proceedings at this meeting may be recorded or filmed. If you choose to attend, you will be deemed to have consented to being recorded and/or filmed.

The recording will be made available on the Council website following the meeting.

Agenda publication date: Tuesday, 12 January 2021.

Agenda - Part I

Guidance Note for Members of the Public attending the Planning Committee (Pages 5 - 8)

1. Attendance by Reserve Members

To note the attendance at this meeting of any duly appointed Reserve Members.

Reserve Members may attend meetings:-

- (i) to take the place of an ordinary Member for whom they are a reserve;
- (ii) where the ordinary Member will be absent for the whole of the meeting; and
- (iii) the meeting notes at the start of the meeting at the item 'Reserves' that the Reserve Member is or will be attending as a reserve;
- (iv) if a Reserve Member whose intention to attend has been noted arrives after the commencement of the meeting, then that Reserve Member can only act as a Member from the start of the next item of business on the agenda after his/her arrival.

2. Right of Members to Speak

To agree requests to speak from Councillors who are not Members of the Committee, in accordance with Committee Procedure 4.1.

3. Declarations of Interest

To receive declarations of disclosable pecuniary or non pecuniary interests, arising from business to be transacted at this meeting, from:

- (a) all Members of the Committee;
- (b) all other Members present.

4. Minutes (Pages 9 - 18)

That the minutes of the meeting held on 9 December 2020 be taken as read and signed as a correct record.

5. Public Questions

To receive any public questions received in accordance with Committee Procedure Rule 17 (Part 4B of the Constitution).

Questions will be asked in the order in which they were received. There will be a time limit of 15 minutes for the asking and answering of public questions.

[The deadline for receipt of public questions is 3.00 pm, 15 January 2021. Questions should be sent to publicquestions@harrow.gov.uk

No person may submit more than one question].

6. Petitions

To receive petitions (if any) submitted by members of the public/Councillors under the provisions of Committee Procedure Rule 15 (Part 4B of the Constitution).

7. **Deputations**
To receive deputations (if any) under the provisions of Committee Procedure Rule 16 (Part 4B) of the Constitution.
8. **References from Council and other Committees/Panels**
To receive references from Council and any other Committees or Panels (if any).
9. **Addendum (To Follow)**
10. **Representations on Planning Applications**
To confirm whether representations are to be received, under Committee Procedure Rule 29 (Part 4B of the Constitution), from objectors and applicants regarding planning applications on the agenda.

Planning Applications Received

11. Section 1 - Major Applications

(a)	1/01 Canons Park Station Car Park, Donnefield Avenue, P/0858/20	CANONS	GRANT - SUBJECT TO LEGAL AGREEMENT	(Pages 19 - 150)
(b)	1/02, Units 1, 1a and 2 Northolt Road Retail Park, P/2052/20	ROXBOURNE	GRANT - SUBJECT TO LEGAL AGREEMENT	(Pages 151 - 262)

12. Section 2 - Other Applications recommended for Grant

(a)	2/01, Land Adjacent to Anmer Lodge, (Car Park Rear of Buckingham Parade), P/3109/20	STANMORE PARK	GRANT	(Pages 263 - 306)
(b)	2/02, Bankfield Cottages, Ass House Lane, P/3983/20	HARROW WEALD	GRANT - SUBJECT TO LEGAL AGREEMENT	(Pages 307 - 336)
(c)	2/03, Carnegie House, 21 Peterborough Road, P/2799/20	GREENHILL	GRANT	(Pages 337 - 372)
(d)	2/04, 10 Christchurch Avenue, P/2631/20	KENTON WEST	GRANT	(Pages 373 - 392)

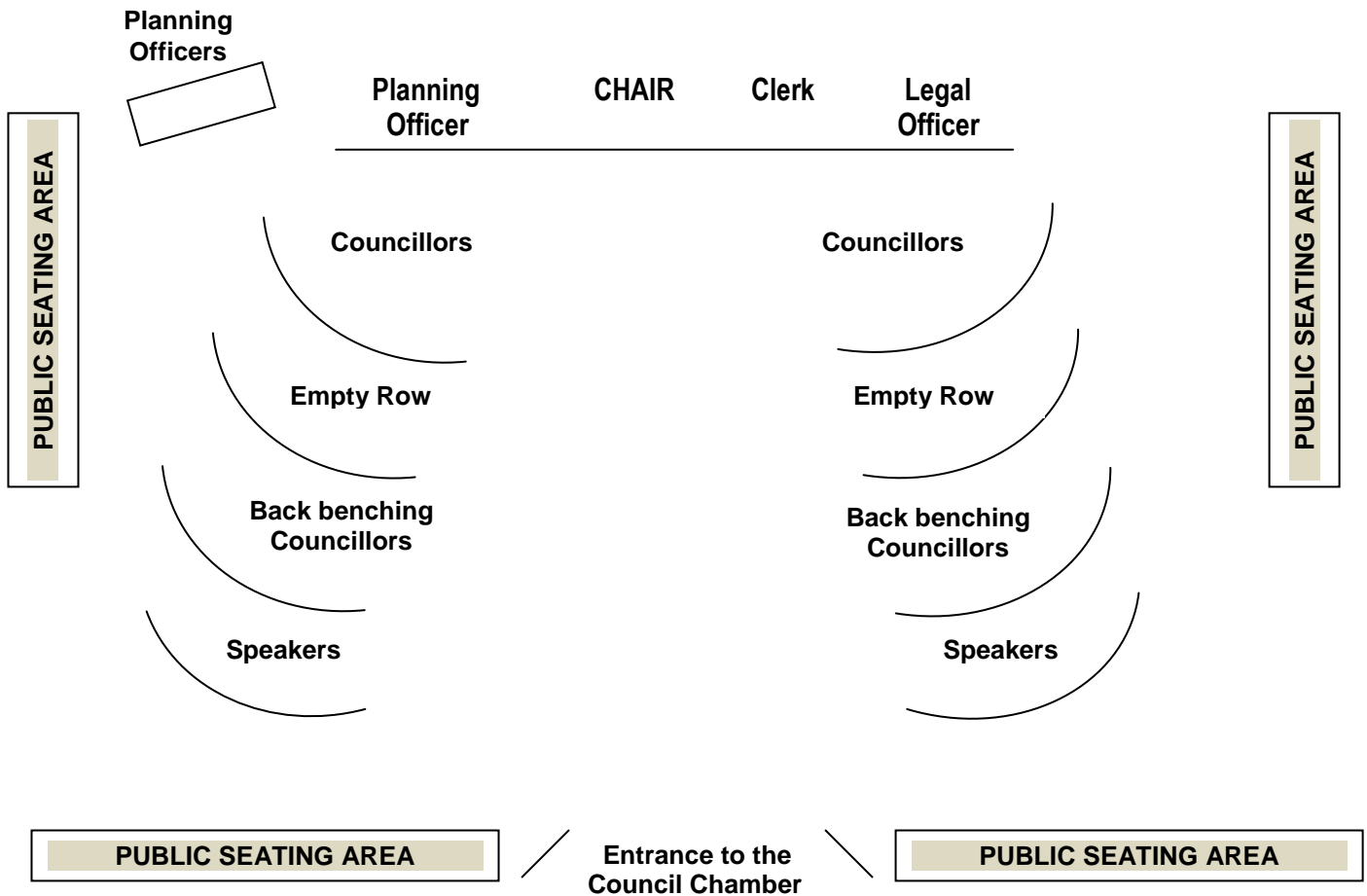
13. **Any Other Urgent Business**
Which cannot otherwise be dealt with.

Agenda - Part II - NIL

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GUIDANCE NOTE FOR MEMBERS OF THE PUBLIC ATTENDING THE PLANNING COMMITTEE

Typical Planning Committee Layout for the Council Chamber



Order of Committee Business

It is the usual practice for the Committee to bring forward to the early part of the meeting, those planning applications where notice has been given that objectors wish to speak, or where members of the public have come to hear the debate. However, often the agendas are quite long and the Committee may want to raise questions with officers and enter into detailed discussion over particular applications. This means that members of the public may have to wait some time before the application they are interested in is discussed. Additionally, the Committee may take a short break around 8.30 pm.

Rights of Objectors & Applicants to Speak at Planning Committees

[Please note that objectors may only speak if they requested to do so by 5.00 pm on the working day before the meeting]

In summary, where a planning application is recommended for grant by the Divisional Director of Planning, a representative of the objectors may address the Committee for up to 3 minutes. Where an objector speaks, the applicant has a right of reply. The Planning Service advises neighbouring residents and applicants of this procedure.

The Planning Committee is a formal quasi-judicial body of the Council with responsibility for determining applications, hence the need to apply rules governing the rights of public to speak. Full details of this procedure are set out in the Council's Constitution, which also provides useful information for Members of the public wishing to present petitions, deputations or ask public questions at Planning Committee, and the rules governing these. The relevant pages of the Constitution can be accessed via this link:

<http://www.harrow.gov.uk/www2/documents/s151078/029%20Part%204B%20Committee%20Procedure%20Rules.pdf>

Addendum

In addition to the agenda, an Addendum is produced on the day before the meeting, with any final updates included in a second Addendum on the day of the meeting. These documents update the Committee on any additional information received since the formal agenda was published and also identifies any applications which have been withdrawn by applicants or which officers are recommending for deferral.

A limited number of hard copy agendas and addendums are available for the public in the Council Chamber from approximately 6.00 pm onwards on the day of the meeting.

Decisions taken by the Planning Committee

The types of decisions commonly taken by the Planning Committee are set out below:

Refuse permission:

Where a proposal does not comply with the Council's (or national) policies or guidance and the proposal is considered unacceptable, the Committee may refuse planning permission. The applicant can appeal to the Secretary of State against such a decision. Where the Committee refuse permission contrary to the officer recommendation, clear reasons will be specified by the Committee at the meeting.

Grant permission as recommended:

Where a proposal complies with the Council's (or national) policies or guidance and the proposal is considered acceptable, the Committee may grant permission. Conditions are normally imposed.

Minded to grant permission contrary to officer's recommendation:

On occasions, the Committee may consider the proposal put before them is acceptable, notwithstanding an officer recommendation of refusal. In this event, the application will be deferred and brought back to a subsequent meeting. Renotification will be carried out to advise that the Committee is minded to grant the application.

Defer for a site visit:

If the Committee decides that it can better consider an application after visiting the site and seeing the likely impact of a proposal for themselves, then the application may be deferred until the next meeting, for an organised Member site visit to take place.

Defer for further information/to seek amendments:

If the Committee considers that it does not have sufficient information to make a decision, or if it wishes to seek amendments to a proposal, the application may be deferred to a subsequent meeting.

Grant permission subject to a legal agreement:

Sometimes requirements need to be attached to a planning permission which cannot be dealt with satisfactorily by conditions. The Committee therefore may grant permission subject to a legal agreement being entered into by the Council and the Applicant/Land owner to ensure these additional requirements are met.

(Important Note: *This is intended to be a general guide to help members of the public understand the Planning Committee procedures. It is not an authoritative statement of the law. Also, the Committee may, on occasion, vary procedures***).**

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<u>Councillor</u>	<u>Planning Application</u>
Ameet Jogia	1/01, Canons Park Station Car Park, (P/0858/20)
James Lee	1/01, Canons Park Station Car Park, (P/0858/20)
Amir Moshenson	1/01, Canons Park Station Car Park, (P/0858/20); and 3/01, Prince Edward Playing Fields (P/1564/20)
Richard Almond	2/03, 3 Lyncroft Avenue (P/2173/20)

461. Declarations of Interest

RESOLVED: To note that the Declarations of Interests published in advance of the meeting on the Council's website were taken as read.

462. Minutes

RESOLVED: That the minutes of the meeting held on 18 November 2020 be taken as read and signed as a correct record.

463. Public Questions

RESOLVED: To note that one public question (with a supplemental question) was received and responded to, and the recording had been placed on the website.

(The video recording of this meeting can be found at the following link: <https://www.harrow.gov.uk/virtualmeeting>)

464. Petitions

RESOLVED: To note that there were none.

465. Deputations

RESOLVED: To note that there were no deputations notified.

466. References from Council and other Committees/Panels

RESOLVED: To note that two petitions (published in the Supplemental Agenda on 2 December 2020) were received from the Council Meeting held on 26 November 2020. These pertained to:

- 1) Canons Park Station Car Park Development; and
- 2) Stanmore Station Car Park Development.

467. Addendum

RESOLVED: To accept the Addendum and Supplemental Addendum.

Resolved Items

468. Representations on Planning Applications

RESOLVED: That in accordance with the provisions of Committee Procedure Rule 29 (Part 4B of the Constitution), representations be received in respect of items 1/01, 2/01, 2/03, and 3/01 on the list of planning applications.

[Note: Planning applications 1/01 and 2/01 were subsequently deferred, and so the representations were not received].

469. 1/01 Canons Park Station Car Park (P/0858/20)

PROPOSAL: redevelopment of existing car park to provide new residential accommodation (Use Class C3) and Sui Generis unit at ground floor and public car park along with associated works.

Councillor Marilyn Ashton proposed that the item be deferred to allow for a site visit to see the views from the Grade II park and fully understand the impact of the development. The motion was seconded, put to the vote, and agreed.

DECISION: DEFER

The Committee wished it to be recorded that the decision to defer the application was by a majority of votes.

Councillors Ali, Ashton, Baxter, Brown, Maru and Patel voted for the application to be deferred.

Councillor Ferry voted against deferral.

470. 2/01 Land South of Anmer Lodge (P/3109/20)

PROPOSAL: redevelopment to provide a six storey building comprising of office floor space on the first floor (use class E) and 9 flats (2 x 3 bed, 5 x 2 bed and 2 x 1 bed) on second, third, fourth and fifth floors; parking; bin and cycle stores.

Councillor Marilyn Ashton proposed that the item be deferred to allow for a site visit to understand the proximity of the surrounding buildings and the access arrangement in respect of the development. The motion was seconded, put to the vote, and agreed.

DECISION: DEFER

The Committee wished it to be recorded that the decision to defer the application was unanimous.

471. 2/02 5 Wellington Avenue (P/2515/20)

PROPOSAL: redevelopment to provide one pair of two storey semi-detached dwellings with habitable roof spaces (2 x 5 bed); landscaping; parking; refuse and cycle storage.

Councillor Marilyn Ashton proposed refusal for the following reasons:

- 1) the development would be detrimental to the character of the area by reason of its siting and scale, contrary to CS1 Core Strategy (2012), 7.4 London Plan (2016), DM1 Harrow Management Policy, D1 Draft London Plan (2019) and to the Harrow Residential design Guide SPD in relation to Garden Development (2013).

The proposal was seconded by Councillor Anjana Patel, put to the vote and lost.

Councillors Ali, Brown, Ferry and Maru voted against the proposal.

Councillors Ashton, Baxter and Patel voted for the proposal.

The Committee resolved to accept officer recommendations.

RECOMMENDATION

The Planning Committee was asked to:

- 1) agree the reasons for approval as set out in the report; and
- 2) grant planning permission subject to subject to the Conditions listed in Appendix 1 of the report.

DECISION: GRANT

The Committee wished it to be recorded that the decision to grant the application was by a majority of votes.

Councillors Ali, Brown, Ferry and Maru voted for the application.

Councillors Ashton, Baxter and Patel against the application.

472. 2/03 3 Lyncroft Avenue (P/2173/20)

PROPOSAL: conversion of dwelling (use class C3) to House of Multiple Occupancy (HMO) for up to 8 people (Use class sui generis).

The Committee received representations from Robert Bruce (objector) and Sammy Chan (agent for the applicant). Both objector and agent outlined their reasons for seeking refusal, and approval, of the application, respectively.

The Committee also received representation from Councillor Richard Almond (Ward Councillor) who spoke against granting the application.

Councillor Marilyn Ashton proposed refusal for the following reasons:

- 1) the development, by reason of the excessive number of occupiers, represents an overly intensive use of the site to the detriment of future occupiers and residential amenity within the locality, contrary to CS1 Harrow Core Strategy (2012), DM1, DM30 Development Management Policy, London Plan Policy 3.5 (2016), Draft London Plan Policy D1 (2019).

The proposal was seconded, put to the vote and agreed. The decision to refuse the application was unanimous.

The Committee resolved to refuse officer recommendations.

RECOMMENDATION

Had this application been not appealed for non-determination, the Local Planning Authority would have recommended that this application be granted.

The Committee was also asked to:

- 1) agree the reasons for approval as set out in the report.

DECISION: REFUSE

The Committee wished it to be recorded that the decision to refuse the application was unanimous.

473. 2/04 25 Abercorn Road (P/2947/20)

PROPOSAL: re-development to provide two storey dwelling (demolition of existing dwelling).

The Committee resolved to accept officer recommendations.

RECOMMENDATION

The Planning Committee was asked to:

- 1) Agree the reasons for approval as set out in the report; and
- 2) Grant planning permission subject to the Conditions listed in Appendix 1 of the report.

DECISION: GRANT

The Committee wished it to be recorded that the decision to grant the application was by a majority of votes.

Councillors Ali, Brown, Ferry and Maru voted for the application.

Councillors Ashton, Baxter and Patel abstained from voting.

474. 2/05 15 Elms Road (P/3177/20)

PROPOSAL: conversion of dwelling house into four flats (1 x 1 bed, 2 x 2 bed and 1 X 3 bed); single storey front extension; single storey side extension; single and two storey rear extension; alterations to roof to raise ridge height; rear dormer; external alterations.

The Committee resolved to accept officer recommendations.

RECOMMENDATION

The Planning Committee was asked to:

- 1) agree the reasons for approval as set out in the report; and
- 2) grant planning permission subject to the conditions set out in Appendix 1 of the report.

DECISION: GRANT

The Committee wished it to be recorded that the decision to grant the application was unanimous.

475. 3/01 Prince Edward Playing Fields (P/1564/20)

PROPOSAL: outline application for access only - redevelopment to provide four storey building with basement comprising of sporting higher education facility, student accommodation, hotel, medical diagnostic centre; plant and associated works.

The Committee received representation from Sean McGrath (agent for the applicant) who urged the Committee to reject officer recommendations, and grant the application.

The Committee also received representation from Councillor Amir Moshenson, who urged the Committee to accept officer recommendations, and refuse the application.

Following questions and comments from a Member on the extent of open space that would be utilised by the community, it was advised that it was yet to be determined.

The Committee resolved to accept officer recommendations.

RECOMMENDATION

The Planning Committee was asked to refuse the application for the following reasons:

- 1) the proposed uses comprising of a hotel, sporting higher education facility including student accommodation and medical diagnostics centre would give rise to inappropriate uses on the site which would be in direct conflict with the site's allocation for community outdoor sport development and by reason of the site's low accessibility, siting outside of a Town Centre or Opportunity Area and insufficient evidence to demonstrate the need for the uses proposed, would give rise to an unsustainable development in a strategically poor and inappropriate location, contrary to the National Planning Policy Framework (2019), policies 3.16, 3.19 and 4.5 of The London Plan (2016), policies S5, E10G, SD7, S1 and S3B of The Draft London Plan - Intend to Publish (2019), core policies CS1 Z, F and L of the Harrow Core Strategy (2012), policies DM 34, DM 46 and DM 48B of the Harrow Development Management Policies Local Plan (2013) and Site MOS5 of the Harrow Site Allocations (2013);
- 2) the proposed development would result in a direct loss of protected designated open space and would not provide a use which is ancillary or appropriate to the existing open space, contrary to the National Planning Policy Framework (2019), policy 7.18 of The London Plan (2016), policy G4 of The Draft London Plan - Intend to Publish (2019), core policy CS1 F of the Harrow Core Strategy (2012) and Policy DM18 of the Harrow Development Management Policies Local Plan (2013);
- 3) the proposed development, in the absence of a Transport Assessment and Travel Plan, fails to demonstrate the impacts of the development on the surrounding highway network, and to propose measures to promote sustainable travel modes and to reduce the effects of travel by car. Insufficient information has therefore been provided to demonstrate that the proposals would not result in unacceptable harm to the surrounding highway network through increased pressure on local parking amenity and on local transport infrastructure from excessive vehicle trips, contrary to the National Planning Policy Framework (2019), policies 6.3, 6.10 and 6.13 of The London Plan (2016), policies T1, T2, T4, and T6, T6.4 of the Draft London Plan – Intend to Publish (2019), policy 1 of the Mayor's Transport Strategy, policy CS1 R of the Harrow Core Strategy (2012) and policies DM 42 and DM 43 of the Harrow Development Management Policies Local Plan (2013);
- 4) the proposed development, in the absence of an acceptable Preliminary Ecological Assessment and the site's close proximity to the adjoining Borough Grade I Site of Importance for Nature Conservation and the Edgware Brook, fails to demonstrate that biodiversity value of the surrounding area would not be harmed, protected or enhanced, contrary to the National Planning Policy Framework (2019), policy 7.19 of The London Plan (2019), policy G6 of the Draft London Plan - Intend to Publish (2019), and policies DM 48 A b, DM 20 and DM 21 of the Harrow Development Management Polices Local Plan (2013);

- 5) the proposal, by reason of an unsatisfactory Flood Risk Assessment, fails to demonstrate that the proposed development would result in a net reduction in flood risk, be resistant and resilient to flooding, would not exacerbate the risk of flooding within the site or increase the risk and consequences of flooding elsewhere or provide a dry means of escape for the future users, to the detriment of the safety of the adjoining occupiers and the future users of the development, contrary to the National Planning Policy Framework (2019), policies 5.12 and 5.13 of The London Plan (2016), policies SI12 and SI 13 of the Draft London Plan (2019), Core Policy CS1 U of Harrow Core Strategy (2012) and policies DM 9 and DM 10 of the Harrow Development Management Policies Local Plan (2013);
- 6) the proposed development, by reason of the indicated heights and conflicting floor space figures proposed, would be likely to result in a harmful, bulky and unduly dominant addition to the site which would significantly detract from the open character of the site and the surroundings, and would fail to respect the existing development on the site or contribute positively to the site's setting and the quality of the open space, contrary to the National Planning Policy Framework (2019), policies 7.4 B and 7.6 B of The London Plan (2017), policies D1 and D3 of the Draft London Plan (2019), core policy CS 1 B and F of the Harrow Core Strategy (2012) and policy DM 18 C/D of the Harrow Development Management Policies Local Plan (2013);
- 7) the proposed development, by reason of the excessive amount of development proposed and the nature of the proposed uses and their relationship with residential properties coupled with an inadequate Lighting Impact Assessment, would give rise to unacceptable harmful outlook and visual impacts, light pollution as well as potential unreasonable noise and disturbance impacts from the increased intensity of use of the site, to the detriment of the residential and visual amenities of the adjacent neighbouring occupiers, contrary to the National Planning Policy Framework (2019), policies 7.4 B, 7.6B and 7.15 of The London Plan (2016), policies D3, D13 and D14 of the Draft London Plan - Intend to Publish (2019) and policy DM 1 of the Harrow Development Management Policies Local Plan (2013); and
- 8) the proposed development, in the absence of insufficient information relating to Air Quality Impacts, including insufficient information relating to the level of car travel or alternative sustainable travel proposals, fails to demonstrate that the proposed development would not contribute to a deterioration in air quality in the locality, to the detriment of the future users of the site and wider area and the overall environmental quality of the London Borough of Harrow, contrary to the National Planning Policy Framework (2019), policy 7.14 of The London Plan (2016), policy of the SI 1 of the Draft London Plan – Intend to Publish (2019) and policies DM 1 and DM 12 of the Harrow Development Management Policies Local Plan (2013).

DECISION: REFUSE

The Committee wished it to be recorded that the decision to refuse the application was by a majority of votes.

Councillors Ali and Ferry voted to grant the application.

Councillors Ashton, Baxter, Brown, Maru, and Patel voted to refuse the application.

476. 3/02 Ayman Lodge (P/3181/20)

PROPOSAL: installation of 1.9m high front entrance gates and brick piers (retrospective).

The Committee resolved to accept officer recommendations.

RECOMMENDATION

The Planning Committee was asked to:

- 1) agree the reasons for refusal as set out in the report.

DECISION: REFUSE

The Committee wished it to be recorded that the decision to refuse the application was unanimous.

477. Any Other Business

Vote of Thanks

Members and Officers expressed their profound appreciation to Councillor Keith Ferry for his services as Chair of the Planning Committee over the years. This would be his last meeting. They wished him well in his future endeavours.

The video recording of this meeting can be found at the following link:

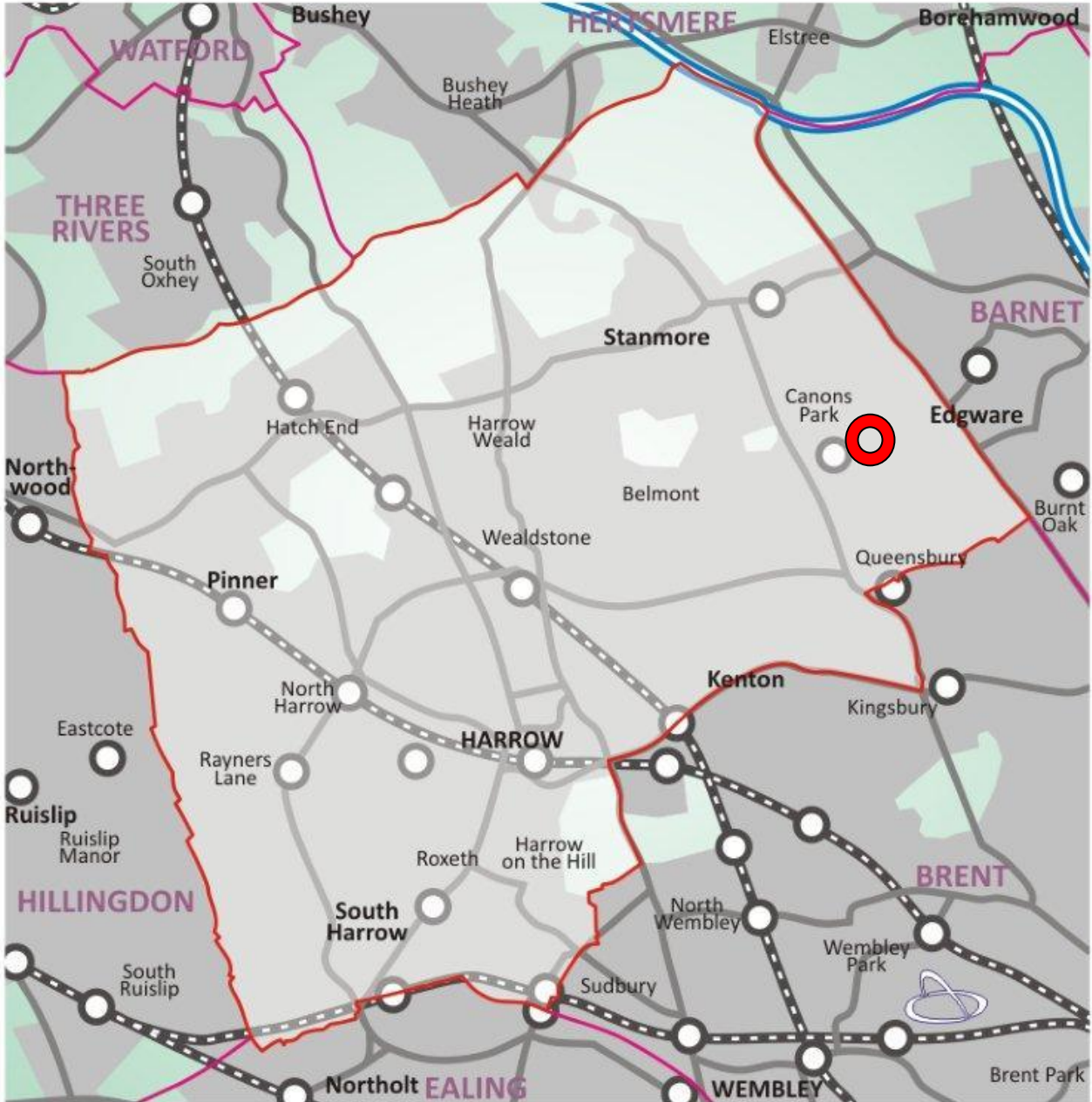
<https://www.harrow.gov.uk/virtualmeeting>.

(Note: The meeting, having commenced at 6.30 pm, closed at 8.30 pm).

(Signed) Councillor Keith Ferry
Chair

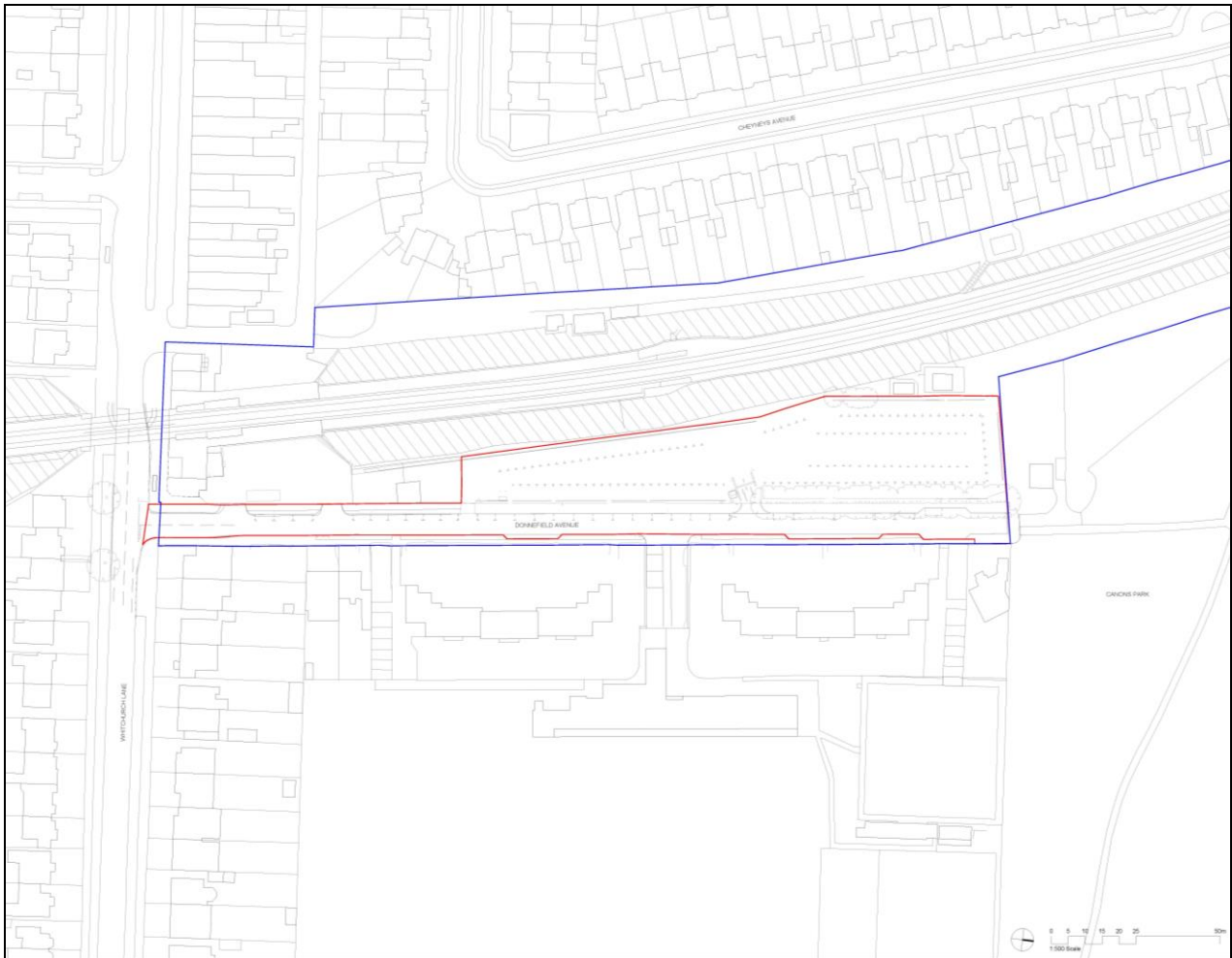
Agenda Item: 1/01

 = application site



Canons Park Station Car Park, Donnefield Avenue	P/0858/20
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CANONS PARK STATION CAR PARK, DONNEFIELD AVENUE



**LONDON BOROUGH OF HARROW
PLANNING COMMITTEE**

20th January 2021

APPLICATION NUMBER: P/0858/20
VALID DATE: 04/03/2020
LOCATION: CANONS PARK STATION CAR PARK,
DONNEFIELD AVENUE
WARD: CANONS
POSTCODE: HA8 6RL
APPLICANT: CATALYST HOUSING LIMITED AND TRANSPORT FOR
LONDON (TfL)
AGENT: CBRE LTD
CASE OFFICER: NABEEL KASMANI
EXTENDED EXPIRY DATE: 31st MARCH 2021

PROPOSAL

Redevelopment of existing car park to provide new residential accommodation (Use Class C3) and Sui Generis unit at ground floor and public car park along with associated works

RECOMMENDATION A

The Planning Committee is asked to:

- 1) agree the reasons for approval as set out in this report, and
- 2) Grant planning permission subject to authority being delegated to the Interim Chief Planning Officer in consultation with the Director of Legal and Governance Services for the completion of the Section 106 legal agreement and other enabling development and issue of the planning permission, subject to amendments to the conditions, including the insertion or deletion of condition as deemed fit and appropriate to the development or the amendments to the legal agreement as required. The Section 106 Agreement Heads of Terms would cover the following matters:

Affordable Housing and Wheelchair Homes

- The following affordable housing to be provided on site:

Affordable Rent

- 2 x 2 bed, 3 person units (provided as wheelchair adapted units)
- 9 x 2 bed, 4 person units
- 11 x 3 bed, 5 person units

Shared Ownership

- 48 x 1 bed, 2 person units
 - 44 x 2 bed, 4 person units
 - 4 x 3 bed, 5 person units
- Cascade mechanism to ensure each Shared Ownership Unit shall be marketed for first sale exclusively to Harrow residents for no less than 3 months and an income cap for eligible purchasers

Transport and Highways

- A contribution for further parking surveys to be carried out prior to occupation and post occupation of the 100th flat and a commitment to funding the study and implementation of CPZ measures should specific interventions be identified. The financial contribution shall be capped at £50,000.
- The development to be 'resident permit restricted' and the developer to ensure that: (i) all marketing/advertising material makes reference to the fact that; and (ii) all sales and lettings agreements contain a covenant to the effect that; future owners, occupiers and tenants (other than those that are registered disabled) will not be entitled to apply for a residents parking permit or a visitor parking permit.
- A commitment that the developer will investigate to the Council's satisfaction and if appropriate, make reasonable endeavours to implement a car club scheme at the site throughout the life of the development
- A Station Travel Plan to be submitted to the Council prior to commencement of development. The developer to ensure the effective implementation, monitoring and management of the travel plan for the site
- A revised Residential Travel Plan to be submitted to the Council prior to the first occupation of the building. A travel plan bond (to be agreed with the Council) will be required to secure the implementation of all measures specified in the revised Travel Plan. The developer to ensure the effective implementation, monitoring and management of the travel plan for the site
- A financial contribution of £25,000 for improvements to the Jubilee Cycle Network
- The developer to enter into a Section 278 agreement to facilitate alterations to Donnefield Avenue. A £5,000 contribution is required for order-making

Children and Young People's Play space

- A financial contribution (to be agreed with the Council) to fund off-site provision (including enhancements to existing provision where appropriate) of play space and equipment

Heritage

- A financial contribution of £10,000 for the repair of the 18th Century Grade II Listed Memorial Garden Walls within Canons Park

Biodiversity Enhancement and Management

- The developer shall submit a Biodiversity Enhancement and Management Plan (BEMP) and any monetary contributions for offsite works dependent on the impact, mitigation and net gains required as set out in the BEMP.

Carbon Offset

- A financial contribution prior to commencement of the development for the shortfall in on-site carbon reductions required to achieve net zero carbon in line with the GLA rates (to be determined based on a revised energy strategy that reflects a more detailed assessment). Verification of post-completion or final on-site emissions will inform any further offset contribution that may be required.

Design Review and Design Code

- An undertaking by the developer to retain the existing architect (or one of equivalent standard) until the development is completed; or, the submission of a Design Code for approval by the Council that details the quality of the external materials of the finished development and other design parameters

Employment and Training

- A financial contribution to be paid by the developer to fund local employment and training programmes and the submission of a Training and Recruitment Plan
- The developer to use all reasonable endeavours to secure the use of local suppliers and apprentices during the construction of the development.

Legal costs, administration and monitoring

- A financial contribution (to be agreed) to be paid by the developer to the Council to reimburse the Council's legal costs associated with the preparation of the planning obligation and a further to be paid to reimburse the Council's administrative costs associated with monitoring compliance with the obligation terms in accordance with the adopted fees and charges schedule.

RECOMMENDATION B

That if the Section 106 Agreement is not completed by 31 March 2021 or such extended period as may be agreed in writing by the Interim Chief Planning Officer, the section 106 Planning Obligation is not completed, then delegate the decision to the Divisional Director of Planning to REFUSE planning permission for the appropriate reason.

The proposed development, in the absence of a Legal Agreement to provide appropriate improvements, benefits and monitoring that directly relate to the development, would fail to adequately mitigate the impact of the development on the wider area and provide for necessary social, environmental and physical infrastructural improvements arising directly from the development, contrary to the National Planning Policy Framework (2019), Policies 3.6, 3.11, 5.2, 6.3, 6.13 and 8.2 of the London Plan (2016), Policies D4, H4, S4, SI2, T4, T6, T6.1 and DF1 of the Publication London Plan (2020), Policy CS1 of the Harrow Core Strategy (2012) and Policies DM12, DM28, DM42, DM43, DM50, of the Harrow Development Management Policies Local Plan (2013), harrow planning obligations SPD

REASON FOR THE RECOMMENDATIONS

The Canons Park Station Car Park is allocated for residential development with the retention of appropriate station car parking, under Site H17 in the Local Plan. The provision of housing on the site is consistent with the Development Plan's broader objective to meet development needs on previously developed land, and to do so in sustainable locations, without resorting to development on greenfield and garden land.

The proposal would deliver 118 units of housing, all of which would be affordable-tenure. The delivery of 22 family sized London Affordable Rent units would meet the priority need within the Borough, while the 96 Shared Ownership units would provide a genuinely affordable housing option for residents in Harrow. The proposal would therefore contribute to the achievement of local policies, the strategic level need for new (affordable) homes for London and the Government's policy objective of boosting significantly the supply of homes.

The proposal has been conceived through a design-led approach that has sought to optimise development on this accessible, brownfield site. Officers recognise the proposal would introduce a development of contrasting scale and height that would contribute to a change in townscape character. However, as set out in the report, various experts in the design field have considered the scheme and have not raised any fundamental objections to the massing or design. Officers are mindful of this expert advice and consider that the proposed buildings would respond to the challenging constraints of the site and optimise the capacity of the site for development. The proposed development would therefore achieve a high standard of design and layout and would deliver an inclusive, attractive, well-designed and accessible public realm that supports the objectives of lifetime neighbourhoods.

The northern tip of the application site lies within the Canons Park Estate Conservation Area. The application site is also within the setting of Canons Park, a Grade II listed Registered Park and Garden. Officers recognise that while many key features contributing

to the significance of Canons Park and the Conservation Area would remain, including verdant views from key viewpoints and individually listed heritage assets, the proposal would nonetheless have a 'less than substantial' harmful impact on the setting of the heritage assets. As set out in the report, officers consider that the public benefits of the scheme outweigh the harm to the designated heritage assets. The balance as set out in Paragraph 196 of the National Planning Policy Framework therefore weighs in favour of the proposals.

The traffic and transport impacts of the development have been appraised by the applicant and are set out in the submitted Transport Assessment. Council Officers have scrutinised the Assessment and concluded that a reduction in the station car parking, car free approach for the residential component and highway works can be accepted, provided suitable mitigation measures are introduced. A package of mitigation measures have been provided to contribute to the modal shift and sustainable travel alternatives, and would be secured through s106 obligations and planning conditions. While many residents have expressed concern at the loss of station car parking and the resulting impacts on traffic and parking in the locality, Officers are satisfied that the transport impacts of the development would be appropriately mitigated. The proposal would therefore align with the strategic and local transport policies as set out in the development plan.

A range of potential environmental effects have been appraised. The proposal would incorporate measures that would help adapt with and manage the impacts of climate change, the environment and biodiversity. Where parts of the proposal would require further mitigation and enhancements, including those needed to secure optimal living conditions for future occupiers and to safeguard the environment during construction and upon occupation, these would be secured through a range of recommended s106 obligations and conditions of planning permission.

The concerns of residents, amenity associations and neighbouring interests are all acknowledged. The report does identify impacts of the proposed development on the amenity of neighbouring occupiers and the on the setting of the designated heritage assets. However, as set out in the report, Officers consider that the material considerations and benefits in favour of the proposal would outweigh the harm.

To conclude, Officers consider that, subject to s106 obligations and planning conditions, the proposed development is acceptable and worthy of support. In accordance with the National Planning Policy Framework, including its presumption in favour of sustainable development, and subject to the completion of a satisfactory section 106 Planning Obligation, Officers recommended that the application is approved without delay.

INFORMATION

This application is reported to Planning Committee as it is a Major Development and therefore falls outside Schedule 1 of the Scheme of Delegation.

This application was deferred from the committee in December for a members' site visit.

Statutory Return Type:	Largescale Major Dwelling Development
Council Interest:	n/a
Net Additional Floorspace:	10,577m ²
GLA Community Infrastructure Levy (CIL):	£51,000
Local CIL requirement:	n/a

HUMAN RIGHTS ACT

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

EQUALITIES

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

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

S17 Crime & Disorder Act

Policies 7.3.B and 7.13.B of The London Plan and Policy DM1 of the Development Management Policies Local Plan require all new developments to have regard to safety and the measures to reduce crime in the design of development proposal. It is considered that the development does not adversely affect crime risk. However, a condition has been recommended for evidence of certification of Secure by Design Accreditation for the development to be submitted to and approved in writing by the Local Planning Authority before any part of the development is occupied or used.

1.0 SITE DESCRIPTION

- 1.1 The application site currently comprises a 162 space public car park (approximately 0.4ha) located on the western side of Donnefield Avenue. The car park is owned by Transport for London (TfL) and provides commuter car parking for the adjacent Canons Park Underground Station. Also included within the site boundary is the Donnefield Avenue carriageway and the pedestrian footway on the western part of the road.
- 1.2 The application site is adjoined to the south by British Emergency Ambulance Response Service (Bears) Centre and beyond this, Canons Park Underground Station. A steep railway embankment and the Jubilee railway line borders the application site to the west. The land to the south and west of the application site is also owned by TfL.
- 1.3 The eastern side of Donnefield Avenue features two detached buildings which are part 2 and part 3 storeys in height and consist of twenty flats respectively. 1-20 Canons Park Close is located opposite to the southern part of the application site and has extant planning permission for the creation of an additional floor (planning reference P/1277/20). 21-40 Canons Park Close is located opposite the northern part of the application site. Also, on the eastern side of Donnefield Avenue is the access to Arnold House School Playing Fields, Acorn Tennis Club and Lupton Bowls club, which is located between the two flatted blocks. To the north of 21-40 Canons Park is the End House, a residential family dwellinghouse.
- 1.4 The application site adjoins Canons Park to the north. Canons Park is a grade II listed Historic Park and Garden and is also designated as Metropolitan Open Land. The northern edge of the application site also falls within the boundary of the Canons Park Estate Conservation Area. Wyel Lodge, a former police office that has been converted back to a residential family dwellinghouse and is located within Canons Park, adjoins the application site immediately to the north.
- 1.5 The application site is located within Environment Agency Flood Zone 1, with a part of the north-western tip of the site falling within Surface Water Flood Zone 3a. Canons Park and the railway embankment which adjoins the west of the application site are designated as a Site of Importance for Nature Conservation (SINC).
- 1.6 The subject site has been allocated for housing (Site H17) in the Harrow Council Site Allocations Local Plan (2013).
- 1.7 The application site has a public transport accessibility level (PTAL) of 3, and is therefore considered to have a good level of access to public transport.

2.0 PROPOSAL

- 2.1 Full planning permission is sought for the redevelopment of the application site to provide 118 residential units (Use Class C3) across three, 7 storey buildings. The proposal would re-provide 60 commuter car parking spaces in addition to a new TfL Cycle Hub.
- 2.2 Building A would be located towards the southern end of the site. The proposed southern flank elevation would be sited approximately 1.5m away from that respective shared boundary. The building would have a maximum depth of 14.5m and a width of 43m. The TfL Cycle Hub would be provided within the southern part of the ground floor. The rest of the ground floor would comprise the entrance lobby, designated cycle and refuse storage for the proposed flats and rooms with servicing/utility provision functions. A total of 22 residential units would be provided within the upper floors. The proposed sixth floor would be recessed with the front elevation incorporating a 2m set-back, while the southern elevation would incorporate 5.8m set back.
- 2.3 Building B would be located centrally within the site and would have a maximum depth of 19.5m and a width of 42m. A separation distance of 13m would be afforded between the proposed southern elevation and building A. The ground floor would have a reduced depth of 8m and would provide an entrance lobby, refuse and cycle storage and two residential units. Beyond this to the rear of the ground floor would be the replacement station car park within a part undercroft. A total of 48 residential units would be provided within this building. The proposed front elevation of the sixth floor would be set-back by 2.5m.
- 2.4 Building C would be located at the northern part of the application site and is identical to building B in relation to its proportions, layout and provision of undercroft parking at ground floor level. There would be a separation distance of approximately 9m between the southern elevation and building B which serves as the access route into the car park, while the proposed northern flank elevation would be sited 10m away from the shared boundary with Wyel Lodge and Canons Park to the north. Building C would also provide a total of 48 residential
- 2.5 The proposed residential units would comprise of the following mix:
- 48 x 1 bed, 2 person units
 - 2 x 2 bed, 3 person units
 - 53 x 2 bed, 4 person units
 - 15 x 3 bed, 5 person units
- 2.6 With regards to the proposed housing tenure, all the proposed residential units would be affordable. A total of 22 units would be London Affordable Rent (equating to 29%) while 96 units would Shared Ownership Units (equating to 71%).
- 2.7 A total of 12 units would be wheelchair user dwellings, while the remaining units would all be 'accessible and adaptable dwellings'.

- 2.8 The proposal would re-provide 60 public commuter parking spaces for Canons Park Station, including 6 wheelchair accessible spaces. The TfL Cycle Hub would provide 71 cycle parking spaces for commuters and the general public to use.
- 2.9 The proposed residential development would be ‘car-free’ and would therefore provide four blue-badge parking bays on implementation and a further eight spaces passive spaces identified for future use should the demand arise. The proposal also provides 212 cycle parking spaces for the future occupiers.
- 2.10 In relation to landscaping and public realm, a community garden would be provided between Buildings A and B, and a pocket garden between Building C and the northern boundary of the application site. The public realm improvements within Donnefield Avenue are aligned to the TfL Healthy Streets guidance including street furniture and soft landscaping. Additional planting is also proposed to the west of the site adjacent to the railway embankment. Improvements to Donnefield Avenue include; highway and pavements re-surfacing, western pavement widening to provide a 2.3m wide pavement and two new highway widenings will be introduced to the eastern side to allow for vehicular passing points and to be used for deliveries and waste collection.
- 2.11 The following amendments have been made to the proposal during the course of the application:
- Removal of the protruding balcony and the Juliette balconies on the northern elevation of Building C facing Canons Park
 - Omission of the ‘play on the way’ proposed along Donnefield Avenue
 - Removal of the raised-table adjacent to the entrance of Canons Park

3.0 RELEVANT PLANNING HISTORY

Ref no.	Description	Status & date of decision
HAR/14793	Provision of car park	Grant 31/12/1958
LBH/24650	Extension to station car park	Grant 02/02/1984

4.0 CONSULTATION

- 4.1 A total of 2,297 consultation letters were sent to neighbouring properties regarding this application. The letters were sent on Tuesday 9th June 2020 and residents were provided with a minimum 6 week period of consultation in which to provide a response.

- 4.2 A total of 10 site notices were placed adjacent to the application site, the main entrances to Canons Park, the Underground Station and the Whitchurch Lane commercial parade on 11th June 2020. The application was also advertised in the local press on 11th June 2020. The application was advertised as a major development, Impact on Setting of a Conservation Area, Setting of a Listed Park and Garden and a Departure from the Development Plan.
- 4.3 A total of 622 neighbour representations have been received. Of these, 614 have raised an objection to the application and 8 have provided support for the proposal. A summary of the responses received are set out below. All material planning/relevant matters have been addressed within report. Other matters raised are not material planning considerations/not relevant to the proposed development.
- 4.4 Furthermore, a petition comprising 2,522 signatures has been submitted in objection to the proposal. The petition has been submitted on the basis that the: *'bulky over-intensive and overbearing proposal is totally out of character with the surrounding suburban area, goes against / contravenes Local, London and National planning policies and will have a devastating and detrimental effect on the views across the Grade 2 listed registered Canons Park. The loss of 100 commuter parking spaces will have a major effect on the locality especially on local and Wembley event days, problems that will be compounded by the application for development of Stanmore Station Car Park'*

Summary of Comments on original consultation

Character and Design

Out of character; scale and height unprecedented; overbearing; overdevelopment; blight on the landscape; out of keeping; high density; over-intensive use; out of character with suburban style homes; bulky; obtrusive; precedent for future height of development; dominating; invasive development; green belt area treated liked a London Zone 1; uninspiring building; unappealing design with zero character; people pay high prices and enjoy living here due to suburban feel of the area; undesirable use of land; incongruous to area; high rise buildings taking over place of housing; loosing character of neighbourhood; 4 fold increase in inhabitants within cul-de-sac and not acceptable on density grounds; nearest building of a similar height is at least 2 miles away; Stanmore and canons park being inundated with buildings of flats; building is only a few meters from the pavement producing the effect of a continuous brick cliff; will look like crowded inner city London; over-subscribed with apartment buildings; out of keeping with surrounding 1930s estate; will dwarf other properties; inner city building design in suburban area; intrude on the skyline; prison like; development should fit-in with the local area; design is bland; heaving mass of redbrick with a small set-back from the narrow pavement.

Heritage / Canons Park

Eyesore from Canons Park; Canons Park will be congested and not enjoyable for residents; increased footfall at Canons Park would negatively impact environment; loss of views to grade II listed park; few green spaces left; St

Lawrence's Church should not be overlooked; would be visible from most of the park and a more sensitive and respectful solution must be found; excess noise and pollution detrimental to Canons Park; westward view from park will be ruined; development will spoil views; will destroy landscape of Canons Park; too much noise and anti-social behaviour adjacent to historic park; canons park important for mental well-being and health; will completely change character of park and views; keep the park a sacred place for personal enjoyment and renewal; overcrowding; overlooking will detract from enjoyment of park; pedestrian access to park compromised by movement of gate for parking so close to the park; will be an act of vandalism perpetrated on a site of national heritage; loss of historic 18th century landscape; pandemic has taught us we need green spaces and unobstructed views; would be sacrilege if the funding and effort to resurrect the sites historical layout and views is ruined by these 7-storey modern buildings; loss of vistas to two 18th century grade 2 listed buildings as seen from canons park; increased parking on roads in the conservation area; canons park will have its value and beauty reduced by the insensitive development; devastating impact on the heritage of canons park; historic sight lines will be overpowered;

Residential Amenity

Neighbouring Occupiers

Loss of daylight and sunlight; noise and disturbances to existing residents; blight outlook; noise and disruption during construction; not enough amenity space; health and safety at risk with pollution and traffic; overlooking and height may impinge on privacy; loss of quality of life; loss of privacy; front facing units with recessed balconies would prejudice the future development potential or no.21-40 Canons Park Close;

Future Occupiers

Noise pollution for future occupiers; small flat sizes; poor view from flats facing platform; noise impact of 24 hour service on weekend; overlooked by users of the station; health risk due to beak dust from trains; size of individual units will lead to mental health problems; communal amenity noise pollution will require windows to always be closed; space is insufficient; limited and unrealistic amenity space with pocket gardens;

Highways and Transport

Station Car Park

Commuter parking spaces needed; car park used on match days for Wembley and the Hive; cheaper to park at station and use underground than commute from outside London Underground stations; car parking at station already at capacity; commuter car parking essential for commuters; safer to use car park than public transport at night; outer edge of London so commuters should be parking here and commuting into London; already station car park cannot meet demand; parking at station vital to allow juggling work, school and home duties; by reducing car parking at the start of the Jubilee line, commuters will not be able to commute; will force people to drive into London; once lost the parking spaces will never be replaced; station car parking is also in short supply like affordable housing; how will losing 60 parking spaces benefit the 1.68 million

users of Canons Park station every year; no station car park during construction; people bringing children in pushchairs/wheelchairs to Canons Park will not have a space for the car; loss of parking spaces will disproportionately affect vulnerable, disabled and frail; how can people use the station if they cannot park cars; Arnold house school's playing field is opposite and parents park in the car park and road while children come in coaches; acorn tennis club and Lupton bowling club opposite and not everyone lives locally so rely on local parking;

Public/Sustainable Transport

Will add to the capacity on trains; public transport is still inadequate so cannot compensate for lost car parking; roads not safe for cycling; commuters in business attire cannot cycle; difficult for anyone who doesn't have means except a car to access station; consider elderly and disabled who do not have an option for public transport to station; buses already overcrowded; women put at more risk during night time without nearby parking; dangerous overcrowding at tube station; public transport will become more crowded; more parking would encourage more use of the station; cycle tracks should be introduced and segregated from pedestrians; should include step-free access at the station; is an overflow car park to Wembley stadium on event days; cycling to station may prove unsuitable; jubilee line has more connections to other trainlines; people cannot afford to take car into London with increased congestion charge; increased cycling or walking does not take into account demographics of area; not safe to walk through the park at night to get to station; relying on people to walk or cycle is unreliable when the weather is inclement; essential that people can get into London quickly; pedestrians at risk by swarms of cyclists;

Traffic and Parking

Area will be overcrowded with vehicles; more congestion in area; more pressure for parking on side streets; will cause too much traffic; ambulance crew from BEARS already park within side roads as there is no other place to park; existing residents forced out due to congestion and parking constraints; area is over-run with cars and living here is a nightmare; battleground for parking; loss of parking permits for local residents; need more parking; Canons Park Estate side roads ruined by parking; reducing spaces will not reduce parking needs; intensive use of Donnefield Avenue which is a small and narrow road; increased volume of traffic; no traffic calming measures established or planned; majority of existing residents have two cars; access to driveways blocked due to existing parking issues; increased traffic will lead to road traffic accidents and delays; shortage of parking for the tennis club; Whitchurch lane already gridlocked; severe tail backs on Whitchurch lane; surrounding roads will see an increase of illegal parking; no provision for increased traffic on match days; nowhere else for commuters to park and would clog surrounding streets

Car Free Proposal

how will the car free use be controlled; residents would still use cars; cannot guarantee buyers wont have cars; no way to enforce car free; to think people will not have cars is naive; lack of parking spaces for visitors of the future occupiers; schemes to reduce car parking in the area have not worked;

Other

Would be better for a multi-storey car park on the site; no offer for step-fee access to station; safety of children accessing the park; access to schools and recreation grounds will become dangerous for pedestrians; speeding drivers; increased likelihood of accidents; vehicle and delivery van location not provided; road is narrow leaving little space for traffic congestion; visibility when turning and access for emergency vehicles already challenging; underground parking could be provided; pressure on road space for deliveries will be intolerable; more on street parking a hazard for emergency vehicles; junction is an accident hotspot; no one can be sure about the long term consequences for the use of private transport as a result of Covid-19; many large delivery vans parked in the local area at night so would be better for these to be allowed to park in the station car park at night;

Local Infrastructure and Services

health, shopping facilities, transport, schooling are strained; amenities and shops not designed to support an influx of families; ability for social infrastructure to support such a large development should be considered; pressure on local services around; lack of local infrastructure and services; no consideration on impact of local services (schools, doctors and amenities); local services will not be able to accommodate increase in population; overwhelmed; increase pressure on public services; water and drainage capacity is inappropriate for the development; further pressure on Council to provide street cleaning and landscape maintenance; schools oversubscribed; disadvantage long-established businesses at canons park station due to higher operating costs

Housing

Need to build more houses with gardens; Harrow could release other brownfield sites or green belt; already enough flats and houses; affordable housing should also include houses and not just flats; flats will be bought and let out and be over-occupied; already have Stanmore Place so don't need another large development in the area; no new housing is needed; housing not the only important factor; more sympathetic proposals for affordable housing previously turned down; told flats would be used by hospital workers but public transport connections to hospital are not good; bigger plots are available to build rather than a cramped and dense development; should focus on abandoned buildings and unused land; affordable housing to who?; new houses should be built outside borough; building A is affordable rent and building B/C is shared ownership which suggests 'poor doors'; why build more flats when there are empty buildings and offices in harrow; properties built are not affordable housing; most units are shared ownership the contracts of which are notoriously burdensome; why so few 3 bedroom units as it is difficult for large families for find affordable housing accommodation; just pushing for highest number of housing units; only 33% of units are for social rent; most houses in the area are multi-occupancy

Environment, Sustainability and Ecology

Increased pollution; water supplies are stretched; pollution will impact health; BEARS ambulance centre will be affected and should be consulted; destruction and depletion of green areas and activities such as bird watching which takes place will be sorely affected; destroying environment by building too much; loss of wildlife; impact on drainage; removal of trees; increased risk of flooding; loss of trees and natural habitats will endanger the sensitivity of the site;

Other

Will increase crime and antisocial behaviour; Harrow is being overpopulated; will not benefit people of Harrow; negative impact on property value; put Harrow residents first before greedy profit; majority of people in locality against the development; money grabbing venture; access for construction traffic will be difficult; building could cause damage to adjacent buildings and railway line; impact on subsidence to surrounding properties; risk of fire; will aggravate rather than enhance social cohesion; TfL losing asset that generates regular revenue for one-off benefit; increase in population will require more employment in locality and jobs for all the new residents; development serves commercial and not community interests; gentrify other places outside London; public land should not be sold off; hooligans loitering around station on Wembley event days; application by London Labour Mayor is vendetta against Harrow East residents who have consistently voted conservative; financial benefits of proposal should be scrutinised to ensure motive is not profit. TfL and Harrow Council should not profit from building on this site; Stanmore Place development already caused a major negative impact; forcing people to seriously consider moving out of the area; many developments in the area granted are much larger than planned; strained relationships might occur between new and existing residents; quick profiteering and long-term misery for the majority of residents;

Comments in Support

Should build taller so we can have integrated shopping and residential complex with access to platforms; should use space above railway more; affordable accommodation in short supply, cycle hub is a good idea, improving streetscene to park entrance, will help local businesses; urgent need of more housing; TfL in need of funding; need more affordable housing;

4.5 Statutory and Non-Statutory Consultation

4.6 The following consultations have been undertaken and a summary of the consultation responses received are set out below.

Consultee and Summary of Comments

LBH Planning Policy

Principle of Development

The Land at Canons Park Station is allocated within the Site Allocations Local Plan (2013). Specifically, the allocation of this site notes that it is appropriate for partial redevelopment of the site for residential purposes. Furthermore, it notes

that any redevelopment of the site must retain an adequate car parking provision, to continue to meet demand generated by commuters and in connection with major events in Wembley stadium. The site allocation sets out an indicative figure of 17 homes, which is set out against half of the site being redeveloped for housing. The current application for Canons Park Station proposes 118 units for the site, which is significantly higher than that envisioned under the site allocation. However, it is firstly noted that the figure of 17 units is specifically identified in the Site Allocations Local Plan as being 'indicative', and therefore any increase in numbers of units above this could still be considered acceptable. The primary balance against the quantum of housing in terms of the site allocation lies with ensuring an appropriate quantum of car parking being re-provided. Accordingly, and notwithstanding the substantial increase in housing units over and above that identified within the site allocation, residential development is acceptable. The acceptability of the quantum will be considered against all other material planning considerations.

Alongside the proposed residential development of the site, it is also proposed to provide on the ground floor of proposed building A, a Cycle Hub (Use Class Sui Generis). This is proposed to be 99sqm in size, and provide 71 cycle spaces for commuters and the general public. The use of part of this building to provide for a cycle hub is considered to be an appropriate use. A cycle hub would provide for facilitates that would assist in commuters arriving at the underground station by way of a sustainable mode of transport, rather than reliance on the private motor vehicle. This would assist in achieving the Mayor of London's aspiration for a modal shift to more sustainable transport typologies.

The principle of development at the site is therefore acceptable.

Affordable Housing Provision

Policy H5 of the draft New London Plan (2019)(Intend to Public Version) sets out the thresholds for major residential applications where a contribution of affordable housing is required. The application proposed 118 units and is located on public sector land, and therefore is required to make a contribution, and also at a minimum threshold of 50% (by reason of being public land). It is noted that the development proposes to offer 100% of the residential units as an affordable tenure product. By reason of offering more than the 50% (in this instance), there is the opportunity to follow the fast track route, which allows applications to not be subject to an appraisal in relation to the Financial Viability of scheme. In measuring the percentage of affordable housing on a scheme, this shall be measured by habitable rooms. This ensures that a range of homes are able to be delivered, including larger, family-sized homes.

Policy H5D states that 'Developments which provide 75 per cent or more affordable housing may follow the Fast Track Route where the tenure mix is acceptable to the borough or the Mayor where relevant'. The application proposes 100% affordable units. Given that the proposed development would provide 100% affordable housing, it could be argued that a Financial Viability Assessment is unlikely to be beneficial in this instance. Indeed if one were to be submitted and a surplus was found to be present in the scheme, it would be

unreasonable to expect the applicant to provide more than 100% affordable housing. However, Policy H5D is clear that an offer of more than 75% affordable housing must have an agreed tenure mix with the borough (in this instance).

Policy H6 (Affordable Housing Tenure) of the draft new London Plan (Intend to Publish Version) (2019), sets out how affordable housing should be split when a residential application is required to provide it. Under Policy H6A:

- 1) a minimum of 30 per cent low cost rented homes, as either London Affordable Rent (LAR) or Social Rent, allocated according to need and for Londoners on low incomes
- 2) a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership
- 3) the remaining 40 per cent to be determined by the borough as low cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.

Following on from above, paragraph 4.6.2 of the draft London Plan (2019)(Intend to Publish Version) recognises that most need is located within the social rent & London Affordable Rent given the need. The Local evidence base for housing type is detailed most recently within the West London and Harrow Strategic Housing Market Assessments (2018).

The London Borough of Harrow Core Strategy (2012) sets out that for housing proposals that trigger the requirement to provide affordable housing, these should provide the maximum reasonable, with a borough wide target of 40%. This goes onto state that the provision should also be split 60% in favour of London Affordable rent, and 40% as an intermediate product (i.e. shared ownership). The higher percentage of London Affordable Rent is a reflection of the evidenced need to provide a typology that directly assists in alleviating homelessness, whereas intermediate products do not provide this to such an extent. With regard to the Core Strategy policy requirement for 40% affordable housing, the proposed development would provide this, and within that, a policy compliant split of 60% London Affordable Rent and 40% of Shared Ownership.

As noted above, the proposed development proposes a 100% affordable housing scheme, with a total of 22 units as London Affordable Rent (to reflect the minimum Core Strategy requirement), and the remaining 96 offered as Shared Ownership (of which only circa 15 units are required to meet the Core Strategy policy requirement). By habitable room, this equates to 29% LAR and 71% S/O across this scheme.

It is therefore disappointing that the applicant in providing their affordable housing offer, has acknowledged the situation that Harrow is in with regard to its housing stock, and the pressures faced in terms of delivering affordable homes to alleviate homelessness / people in temporary accommodation, and then proposed an overwhelming quantum of an affordable tenure that is not the evidenced need and does little to address the housing pressures they have

specifically identified.

Genuinely Affordable Product

It is also important that these tenures are 'genuinely affordable'. The draft New London Plan (2019) (Intend to Publish Version) across each of its Affordable Housing Policies, state that the Mayor will seek genuinely affordable housing to be delivered. In terms of the London Affordable Rent, the applicant has stated that this would be let in accordance with the GLA's definition / rent levels. All service charges will be in addition to the rent. This approach is considered to be appropriate.

The Shared Ownership offer, which makes up the majority of the housing quantum, is proposed to be brought forward in line with GLA guidance. Specifically, this is stated as being affordable to households with an income of up to £90,000. The applicant does go on to state that there will be a cascade mechanism within the S.106 agreement (in the event that the scheme is approved), that will ensure for the 3 months that units would be offered exclusively to Harrow residents at locally agreed income threshold caps. This approach is encouraged. Specifically, the LPA has sought detail from the applicant to demonstrate that the Shared Ownership products being offered are genuinely affordable to Harrow residents (based on an average Harrow household income at Borough and Ward Level).

In the event that planning permission is recommended for approval, it is recommended that a hierarchy obligation be secured to ensure that housing is offered to Harrow residents first, and also are offered at capped household income levels dependent on the size of the units but for at least the 1 and 2 bed Shared Ownership units, at income levels below the Mayor's London-wide cap of £90,000 per year (as set out in the GLA Annual Monitoring Report). Following this, it should be released to West London (WLA boroughs), and then to wider London. Once released to West London and London wide, this will be at the GLA cap.

Conclusion

The proposed development would provide a comprehensive re-development of the site, which is acceptable in principle and welcomed. Furthermore, the proposal would offer 118 units, all of which would be offered as affordable housing, which again, in principle would be acceptable.

Response to additional information provided during the applications:

- Within 3-bed SO, rent set at 1.8% (below the Mayor's cap of 2.75%) to make these units affordable at an income cap of £74,500. This is positive and its good they've committed to it in material forming part of the application. However, it only relates to a small number of units within the policy compliant offer as the voluntary SO is 1 and 2 bed
- Cascade mechanism broadly reflects other schemes. Eligibility criteria should include those working in Harrow.
- If weight given, then voluntary SO would need to be secured in S106 and any change from this should be presented back to Planning Committee.

- Their example of SO at Burnt Oak suggests local demand (40% of sales) and that upper incomes were £64k. Purchasers had a range of ages but mostly 25-50 yrs.
- An average Harrow household should be able to afford a one bed flat. Two incomes or a high-earning single income would be required for two and three beds.

Energy and Sustainability

The applicant has submitted an energy statement prepared by Couch Perry Wilkes, dated 24 February 2020. The energy strategy broadly follows the energy hierarchy as required in the current and 'Intend to Publish' versions of the London Plan.

The overarching target for development in the Intend to Publish version of the London Plan is 'zero carbon', with this preferably achieved on site (where this cannot be achieved, an offset contribution may be made to the Council to undertake carbon emissions reductions elsewhere in the borough). The strategy indicates that the development will achieve overall on-site carbon reductions of 48%, which is in excess of the minimum 35% required under the London Plan. The remaining 65 tonnes of carbon will be offset at the current GLA rate of £1,800 per tonne (£60 per tonne / year x 30 years), equating to a contribution of circa £117,000 (note: once the Intend to Publish version of the London Plan is finally published, a higher rate will apply). These measures / outcomes are supported.

In terms of a communal heat network, in this particular instance (having regard to the specific development, site and location) we can accept omission of a district energy network plant room given that there is relatively low likelihood of a wider district heat network coming forward in the foreseeable future in the absence of other major development opportunities within the immediate area and the potential impact that such plant room provision would have on the footprint and bulk of the development (with potential for further impact on biodiversity and built conservation etc).

The details should be addressed through an updated energy strategy. A pre-commencement condition will need to be applied to any permission requiring the submission of a revised energy strategy that takes into account the more detailed assessment / design of the proposed ASHP system. A pre-commencement condition is considered necessary as the detailed design of the ASHP will influence the detailed design of the rest of the scheme, including potentially at foundations / lower level stages.

Any S106 agreement should include payment of the offset contribution prior to commencement of the development (based on a revised energy strategy that reflects the more detailed assessment / design of the proposed ASHP) and the verification of final carbon emissions / further offset contribution secured post-completion if actual / final on-site emissions exceed that assumed in the original offset contribution calculation. The agreement should also reflect the Mayor's 'Be Seen' requirements.

LBH Conservation Officer

Significance

The proposal is in the setting of the Canons Park Conservation Area and the grade II listed registered park and garden. This is a link to the list description: <https://historicengland.org.uk/listing/the-list/list-entry/1001394>. The Canons Park Conservation Area Appraisal and Management Strategy (CAAMS) states: 'The Canons Park Estate CA is an outstanding area given its special landscaping, openness, and good architecture. This is because it comprises a large part of the original Canons Park estate including the grade II listed mansion dating back to 1747 and surrounding landscaping'.

The NPPF defines the 'Setting of a heritage asset' as: 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.

There is a sense of isolation within much of the park from built up surroundings as there are reasonably open surroundings with surrounding development where present being low rise.

Appraisal

NPPF paragraph 200 states: 'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably

The proposed new buildings would be visible in open views from the parkland. It is the feeling of seclusion and openness in the park that provides the conservation area and registered park and garden with a large part of its special character and appearance as noted in the CAAMS. The proposal would greatly undermine this character given the height proposed and its proximity to these designated heritage assets as well as the large amount of glazing and balconies (Juliet and full balconies) facing the park. It would also be lit up at night.

A map showing the zone of visibility would be helpful to show clearly the impact that this would have on the park. It is noted by the supporting documents that this would not be visible as far north as the walled garden which is good but it seems it would be evident further south.

In addition, viewpoint 6 in Canons Park shows the impact on the two storey house, The Lodge in Canons Park, at the entrance of the park, just beyond the end of Donnefield Avenue. The lodge is 17 metres away from the seven storey Building C. The Lodge was designed as small scale property, ensuring that the overwhelming openness and greenery of the conservation area remains part of the special interest of the registered park and garden and character and

appearance of the conservation area. In recognition of the importance of this multiple article 4 directions have been added to this property to ensure that additions require planning permission so they can be managed to ensure that they do not overwhelm it and undermine these key characteristics of the heritage designations.

The scale of the effect of the proposed new build in its setting is noted as 'large' in the Townscape Appraisal. The cross section in the Design and Access statement shows the proximity of The Lodge. Building C is too close to be screened and there is no space for 'buffer' planting. It would not be possible to provide meaningful soft landscape to screen or soften the view of the building.

The cross section (extract from the visual appraisal) shows the height and nearness of the building Building C in relation to The Lodge, and insufficient separation or space to provide a soft landscape 'buffer' or break up the view.

View 5 – the proposed development will be clearly visible from the listed Canons Park and The Lodge and will have a 'large' impact on the overall sense and atmosphere of 'openness and greenery' within the park. There is insufficient space within the development to provide softening or screening of this view.

View - 3 shows a similar impact on openness, greenery and the present relative sense of isolation from built up surroundings, from this viewpoint in the conservation area and registered park and garden.

In line with the NPPF paragraph 193, 194 and 196 any harm would need clear and convincing justification including consideration of public benefits and great weight needs to be given to an asset's conservation.

It is only a reduction in height that could alleviate/ remove the harm significantly, particularly to the building nearest the park. This is recommended. However, otherwise amending the design to omit the balconies/reducing glazing facing the park would help, as would reducing the amount of glazing facing it.

It is noted that there are public benefits to be weighed up against the harm but this should only enter the weighing up process if the design cannot be amended to avoid the harm but allow for the same benefits.

LBH Highways

Station Car Park

Canons Park Station is positioned off the B461, Whitchurch Avenue. This location is easily accessible for people travelling by car from the local area and areas north of London. The station is close to the end of the Jubilee line.

The proposal seeks to reduce the capacity of the existing car park by 63% from 162 spaces to 60. This would result in a daily am and pm peak hour reduction of 200 two-way car trips. The car park is very well used, the submitted details show full occupancy on weekdays for the majority of the traditional working day.

The Transport Assessment includes a study of where people are travelling from which shows that 33% of drivers using the car park live within 2km of the station and a further 45% live within 5km. 41% of those surveyed indicated that they would consider cycling if facilities were improved at the station.

This does suggest that there is a significant number of people currently driving to the station that could potentially travel using a more active mode. To enable modal shift, it would be necessary to provide more than cycle storage; route planning, cycle training and cycle hire may increase the likelihood of people actually making a change.

The public transport accessibility level (PTAL) is rated as 4 at the station however it varies between 2 and 3 in the immediate vicinity. It would be fair to consider that public transport options are moderate at this location – three regular bus routes and the Jubilee line underground service. There are existing on-carriageway marked advisory cycle lanes along Whitchurch Lane.

A reduction in car park capacity may lead to overspill parking on-street however, there are existing parking restrictions in the roads around Canons Park station which seem to be working effectively as has been demonstrated by the parking surveys presented in the Transport Assessment. It is possible that outside of the hours of restriction, roads may begin to experience more parking demand, therefore it would be appropriate to monitor the situation with a view to increasing on-street parking controls as necessary. Funding for the monitoring and management of the Station Travel Plan will be secured via S106 Agreement, and will be for a period up to 12 months after the scheme is complete. A financial contribution of £25,000 is required for improvements to the Jubilee Cycle Network and £5,000 for work-orders related to the S278.

A reduction in public car parking can be accepted provided suitable mitigation measures are introduced.

Residential Development

Accessibility

The site is within a short walk of a local parade of shops, open space and bus stops. Edgware town centre can be reached by a short bus ride or is within walking and cycling distance for those who wish to travel more actively. Edgware is a busy metropolitan centre with access to Northern line Underground services and a bus station.

Whitchurch Lane has sufficient footway widths often with grass verges and street trees. There are on-carriageway cycle lanes and nearby is a connection to the Jubilee cycle route which follows the route of the Jubilee line through quieter streets.

The proposal includes alterations to the highway in Donnefield Avenue to improve the pedestrian experience leading to Canon's Park.

These measures look aesthetically pleasing however are not completely

practical for this location. The reduction in car parking will mean that fewer cars will be parked on-site however, the road is a cul-de-sac meaning that every vehicle makes two trips and has to turn around. We do not know what the current daily traffic flows are in this location but the choice of materials and layout need to be safe and able to withstand turning manoeuvres by all types of vehicle; resin and building paving are not suitable. Raised tables are not considered necessary for this route as these are usually used at junctions and in places where speeds need to be reduced.

The intention to make this route more attractive is understood however, play equipment on a footway is not something that would normally form part of the adopted highway for safety and maintenance reasons. If the applicant wishes to dedicate any land as highway this will need to meet the requirements of the Highway Adoption Policy and would be subject to legal agreement.

A Road Safety Audit is included in the Transport Assessment. Four problems were identified in relation to the design of Donnefield Avenue; the layout and size of spaces in the public car park, access to the cycle hub, carriageway width and large vehicles overrunning on-street parking spaces. The design responses are accepted.

The recommendations in the ATZ route assessment have been noted; should the application be granted, these will be put forward to ward members for further consideration with a view to implementing those measures considered most appropriate.

Car Parking

The proposal is presented as a car free development and as such will only provide disabled parking spaces in accordance with Intend to Publish London Plan standards.

During the pre-application process Highways raised concerns about the suitability of the site for a car free proposal and the Transport Assessment includes a study in response. The location is rated as PTAL 3 - moderate.

Large scale, car-free developments are usually best suited to high PTAL locations where public transport facilities are excellent and there are multiple conveniences within the immediate or near surroundings.

Whilst this location has access to buses and the tube network, the nearest town is a 15-20 minute walk away.

The supplied study gives statistical details on the likelihood of people to own cars and travel by car when living in car free developments and looks at the potential for sustainable trips in PTAL 3 locations however, this does not mean that people will not own and drive cars regardless. It is clear that there is likely to be a reduction in car ownership in comparison to a development where maximum levels of parking are provided but not without some residents still keeping cars.

The parking surveys supplied indicate that there is on-street capacity in the local area which may actually counteract the car-free intentions as many of the existing parking restrictions do not operate overnight or at the weekend meaning that residents of this development would be able to work around the hours of operation.

It would be more appropriate to provide a car-lite scheme where some parking is provided for the new residents and monitor the on-street situation with a view to altering the existing hours of operation if demand for parking increases following occupation of the development. This would mean that car free living could still be expected from most residents but for those that would benefit from affordable housing but still need to rely on a private car (eg. a community midwife, health visitor or night-shift worker) there would still be some provision.

The aspiration to provide car-free developments in Harrow is supported in suitable locations but it is considered that this large scale proposal combined with a reduction in public car parking may result in overspill on-street parking which would be detrimental to the surrounding highway network without appropriate mitigation. For this reason it would be necessary to monitor on-street parking in the area surrounding the development before and after occupation to determine whether alterations to the CPZ hours are required. A contribution to fund the assessment and possible alterations will be required.

Cycle Parking

Cycle parking is to be provided in line with Intend to Publish London Plan requirements. The location for short stay cycle parking needs to be clarified as the Transport Assessment doesn't specify a location instead seeking for this to be subject to condition yet the Landscaping Strategy states that it will be on-street. Spaces should be provided within the curtilage of the development, off the public highway. A suitable condition should be added seeking details of the stores, their locations and securing cycle parking in perpetuity.

The cycle hub is welcomed but should be supported by further measures to persuade commuters to cycle.

Trip Generation

The trip generation methodology was previously agreed however the redistributed modal splits are heavily weighted towards underground trips but following the events of the COVID 19 pandemic this year, it is possible that more people will continue to work from home at a higher rate than previously seen which may result in a reduction in daily tube travel. As the development is intended to be car free it can still be assumed that the majority of trips will be made by other sustainable modes in any case.

The number of daily peak hour trips generated by the public car park would reduce by 200 if the car park capacity is reduced as proposed. This would have the benefit of improving the local environment and encouraging more sustainable travel to and from the station.

Being car free, the residential element would generate very few car journeys. Public transport use would increase, however the TA includes an assessment of public transport impact that shows that there is sufficient capacity on buses and tube trains at this location

Delivery and Servicing

It is understood that deliveries and servicing would take place on the highway as there is insufficient room within the development site to accommodate this activity. The anticipated 13 deliveries per day is an increase on what currently takes place in Donnefield Avenue. Whilst this isn't a significant number of journeys, as the road is a cul-de-sac it does mean that these vehicles have to enter, turn around and exit. These manoeuvres will be in addition to the trips generated by the existing properties along the road and as online commerce increases, the number of delivery trips may also increase too. There is some concern about how this would impact on the pedestrian and cycle environment for Donnefield Avenue.

DSP Monitoring – the delivery monitoring survey schedule along with details of the person responsible for monitoring should be included alongside the Travel Plan requirements that will be secured via s106 agreement. A detailed Delivery and Servicing plan should be secured by condition.

Construction Logistics Plan

The outline plan provided is acceptable and a detailed plan should be secured by pre-commencement condition. The plan must follow TfL guidance and should only be submitted when the contractor has been appointed and all required details are known. It is advised that early engagement with the Council is recommended in relation to traffic management at this location and discussions should be held prior to submission of the detailed CLP should permission be granted.

Parking Design and Management Plan

The proposed management method for the residential disabled parking would see the removal of up to 12 further spaces from the public car park should demand for the residential spaces exceed the initial provision. As the public car park is already being reduced significantly, a further reduction would leave only 42 standard parking spaces. This could result in overspill parking when the existing waiting restrictions are not operating in the evenings and at the weekends.

The residential disabled bays also need to meet electric vehicle charging requirements, therefore one space must have active provision and the remaining, passive. In relation to cycle parking security it does seem odd to not provide CCTV coverage of the residential store if it is being installed elsewhere. This would help to reassure residents which in turn encourages cycling.

Conclusion

The proposal to redevelop Canons Park Station car park to a residential

development of 118 dwellings and a 60 space public car park has been considered as set out above. In terms of highways impact, the proposed development is expected to result in a reduction in car trips and an increase in trips by other modes. The principle of a residential development is feasible for this site however a large scale, car free scheme combined with a reduction in public car parking is considered unsuitable for the location as it is likely to result in harm for the surrounding highway network due to insufficient mitigation measures.

Response to Transport Assessment Addendum

I am generally satisfied; they have provided the information that we asked for and additional mitigation measures include the Station Travel Plan and contribution for survey and implementation of works for the CPZ.

LBH Travel Planner

There are good measures included in the Travel Plan. We would like to see the following measures/ additions included:

- Make all printed material to be made available electronically
- Commitment to providing adult cycle training (this is listed but under 'promoting cyclist and pedestrian training) Please include separately as it will be clear you aim to provide/support cycle training for all residents
- A link to Harrow Council's website, which will have details of local events such as the Harrow marathon.
- Commit to investigating incentives through operators such as discount for residents and workers in the commercial unit. The Welcome pack should be made available electronically

In relation to the action plan a copy of the Residential Travel Pack should be submitted to Harrow Council for approval prior to occupation. The Travel Plan Coordinator timescales need to be updated as noted above.

For monitoring and review, surveys should be conducted on the anniversary of the baseline. Interim reports to be submitted to Harrow Council in years 2 and 4, which will demonstrate what progress has been made in the previous 12 months

Travel Plan monitoring fees to be secured by agreement. Amount to be detailed by agreement. In the event the Travel Plan is unable to meet targets, a remedial sum will be used to cover the cost of additional measures to support the achievement of targets. Remedial sum to be secured by agreement. A Review is to be submitted within 2 months of completion of baseline survey.

LBH Drainage Engineer

The submitted Flood Risk Assessment with the Drainage Strategy is acceptable. No objections subject to conditions for foul and surface water disposal, surface water attenuation and permeable paving in accordance with the standard submission requirements.

LBH Housing Enabling

Provides 100% affordable housing in the following mix:

Tenure	1b2p	2b4p	3b5p	4b6p	Total units	Total Habitable Rooms
London Affordable Rent	0	11	11	0	22	99
Shared Ownership	48	44 (3p)	4	0	96	248
Total	48	55	15	0	118	347

In terms of the policy compliant 40% element of the scheme, the 99 London Affordable Rent habitable rooms represent 71% of the policy compliant offer (47% by unit), which is acceptable on a habitable room basis. However, overall this scheme proposes 71% shared ownership by habitable room (81% by unit) and comments on this are given below. Regarding, the bed size mix of the policy compliant element, the provision of 2b4p and 3b5p London Affordable Rent units for family housing is welcomed.

The London Affordable Rent accessible unit provision to be 10% of the total LAR units proposed, so that is acceptable. The Proposed units are stated to be in compliance with National and London Plan space standards. The schemes are described as being tenure blind, and as providing policy compliant wheelchair user parking and private amenity space for all units, which is welcomed. The rented units will be let at London Affordable Rent levels, excluding service charges, which is in accordance with GLA policy

However, whilst the scheme provides 100% affordable housing, the applicant acknowledges that Harrow has a small housing stock and very high demand for housing from homeless households, home seekers and tenants waiting for alternative accommodation (i.e those in need of London Affordable Rented housing). It is therefore regrettable that additional London Affordable Rent homes are not proposed, over and above those within the 40% policy compliant element.

LBH Environmental Health

Sound reduction of 24dB(A) recommended but no detail has been provided as to how it meets this. Conditions suggested in relation to noise and contamination.

LBH Design Officer

Context and Vision

The proposed buildings have a complimentary relationship with the neighbouring low-rise mansion buildings to the east of Donnefield Avenue. Accessibility is highly considered, as is legibility throughout the site and internal spaces. The scheme has potential to frame the southern entrance to Canons Park in a welcoming and materially rich way. New planting and residential

frontages to Donnefield Avenue are welcomed and increase passive surveillance, creating a more pleasant pedestrian environment. Existing mature trees to the north of Donnefield Avenue should be retained wherever possible. The relationship of the site to Canons Park should be celebrated and taken as an opportunity to increase site greening and biodiversity, acting as an extension to the park itself. The inclusion of a community garden is welcomed and should include growing space. A pocket park at the site's northern boundary balances this provision. There is potential for growing space to be incorporated at the front of the site.

Accessibility is thoroughly considered in relation to circulation within homes, general arrangements and communal spaces. Active frontages to Donnefield Avenue are highly welcome and will increase the feeling of safety and usability for pedestrians. The majority of units have either a primarily eastern or western aspect, with corresponding amenity spaces. This approach is welcomed and it is noted that no units are north-aspect only. High quality entrance lobbies with rich tiling and terrazzo elements are provided, which enliven shared spaces. The materiality of buildings sits well beside the open space of Canons Park, providing a rich architectural boundary to the copse elements of the park. Material treatment is generally well considered and the inclusion of curved elements to balustrades and entrances is welcomed and should be increased.

Front elevations are partially successful, with limited rhythm and alignment of façade elements. The specified material palette must be sufficiently different from both Rayners Lane and Stanmore sites, the current palette is presently very similar.

LBH Landscape Officer

The proposed development scheme has been the subject of several pre-application meetings, including design workshops with redesign of various parts of the masterplan and various iterations of the scheme with some improvements. The proposed change of access for the crane and relocation of the commuter car park entrance towards the centre of the site, between buildings B and C were positive moves reducing the traffic driving to the end of the road adjacent to Canons Park. A space for a pocket park was created. The site is boarded by a Site of Importance for Nature Conservation – (SINC area to the west, designated as Grade II site of Borough Importance for Nature Conservation) and to the north, the approach is in the setting of Canons Park Conservation Area and the grade II listed registered park and garden. The development proposals have evolved over time and the Design Review Panel were consulted and have made substantial contributions to the design process.

The proposed development site is highly constricted, narrow, linear and tapering in shape, with a large space to the west/ northwest of the site in the car park, needing to remain open and accessible to a TfL crane vehicle, requiring a significant amount of open space to turn. This car park space area cannot be soft landscaped and therefore visual softening and a landscape setting for the back of the flats Buildings B and C would be difficult. There are very limited opportunities for creating attractive, accessible, sustainable and generous

communal amenity spaces, for the benefit of residents.

The Proposed rain gardens would be welcomed as long as there is sufficient space and the location appropriate. The concept of creating interest and incidental play along the street and a social street for residents with an enhanced approach to Canons Park could be an interesting proposal, subject to space availability for the various elements, activities and safety. However, the narrow strips of planting along Donnefield Avenue are likely to be unrealistic and trampled as a result of the play and pedestrian access.

Reservations remain as to how robust the planting will be in the small spaces and the vulnerability to trampling, dogs and people, however the planting beds could remain in the proposals. As a suggestion, there could perhaps be an agreement that if the planting was insufficiently robust to withstand the intensity of use in the area and failed over time, planted beds could be removed and paved over. It is acknowledged the trees will require maintenance over time and the size will be controlled. The appropriate species selection can be agreed through detailed design.

The limited available communal amenity space and to the rear of the development, the openness of the car park area without any proposed tree cover due to the requirement for crane access, is of concern. The larger communal garden space may be overshadowed by the building Buildings A and B. The Pocket park, may be overshadowed by Building C. The car park area hardstanding and parked cars would be an unattractive outlook and poor setting for the buildings. The proposed street has more of an urban appearance, harsh and out of keeping in the existing sub urban area with plentiful existing greenery. There is limited space available to the front of the buildings for soft landscape.

Tree planting – Proposed trees in hard areas should be installed in underground cellular systems to provide adequate volumes of topsoil to support establishment through to maturity, for example systems such as GreenBlue Urban. This would be essential in such tight urban hard surfaced spaces to be sure that the trees have sufficient growing medium to be successful to survive and thrive.

The Community garden and the Pocket garden are both proposed to be multifunctional. The space allocated within the garden will need to work very hard. The various proposed uses for the garden are ambitious in the small space, in particular in the pocket garden. The proposals for use of the small space need to be realistic.

High quality hard materials, street furniture, planting, boundary treatments and other elements including biodiversity elements have been proposed. How will this be translated into the actual build? These proposed elements are attractive images and ideas on the drawings, however, these proposals need to be practical, robust and realistic and assurance would be required that the proposals will be carried out and implemented, rather than any subsequent

value engineering and removal of high quality elements at the detailed design stage.

The information on the proposed hard and soft landscape and palettes is indicative and further details will be required to understand how realistic the landscape proposals are. A robust landscape management plan and maintenance plan, including a calendar of operations and tasks must be in place to ensure the ongoing success of the landscape proposals. The planting choices would require detailed review, more robust planting might possibly survive the intensity of use of the various small green spaces that are proposed, although doubtful in the long term

Reassurance has been provided committing to some of the issues to be addressed by detail design through planning conditions. Catalyst with its' dedicated environmental services team will look after, fully managing and maintaining the site including all the landscape. Planning conditions for the landscape will be required, as previous suggested

LBH Biodiversity Officer

The western and northern margins of the site are adjacent to a section of the Borough Grade II Canon's Park and Stanmore Railway Embankments SINC which incorporates Canons Park and provides part of a strategically important Green Corridor connecting part of the chain of important sites at the northern end of the borough with more residential and more heavily urbanised sections. Although the railside embankment is supported by well-treed parkland and grassed sports areas elsewhere, the strip of SINC to the west of the development site is a relatively weak link. Any residual impacts on this following mitigation will need to be addressed.

The wider SINC area has some lateral green links to the Borough Grade II SINC's of Stanmore Marsh and Canons Lake and the Basin but the area of the borough south of the site is highly deficient in provision of access to nature and the benefits which this offers. Consideration should be given to this when accessing the impacts of the proposed development and its ongoing use.

The application is supported by a range of information including an Ecological Impact Assessment (ECIA) following on from a Preliminary Ecological Assessment (PEA) and draft EcIA. Provided necessary measures are agreed to and undertaken in accordance with conditions that will need to be set, there are no reasons why the scheme should not be accepted on grounds of biodiversity.

Harrow's policies in relation to SINC designated land is that there should be neither net loss of SINC area nor value. The applicant has accepted that there will be some impact on the SINC. Regardless of whether or not the Biodiversity Ecological Management Plan, once agreed and implemented, will provide adequate net gain for biodiversity within the development red line, there will be a need to address the impacts on the SINC and the role it plays within the local nature network. I consider that with the proposed scheme there will be a need to address or compensate for the impacts either within the adjoining land or

elsewhere in the vicinity, where this would make ecological sense. This should form part of the CEMP/BEMP discussion and approval.

LBH Arboricultural Officer

There are no TPO restrictions within influencing distance of the site. The northern part of the site falls within the Canons Park Conservation Area. The embankment The tree survey identifies 2 'C' retention category Ash (T5, T6) and a 'C' retention category Cypress leylandii group (G7) to be removed due to their location within footprint of proposed buildings. G7 was most likely originally planted for screening purposes but which now has relatively little retention value or long term potential

The development site is narrow and linear, tapering at the southern end. The proposed new building at the southern tip of the site is in close proximity to G1 mixed species group within the SINC embankment, creating a significant pinch point where the tree canopies encroach onto the building. Facilitation pruning will be required for construction working space; the cumulative / long term impact also needs to be considered, given the future management requirements at this end of the site, where trees directly encroach or face potential future pressure for pruning / removal.

The space available for new trees on the Donnefield Avenue frontage is limited – 4m maximum between the new houses and road / parking bays. Trees will need to integrate with what is already a 'busy' area with lots of street furniture and infrastructure - in addition to parking bays, cycle racks, benches / picnic tables are also proposed beneath or nearby – when picturing the development in 10 or 15 years time, will some of these trees have already outgrown their location?

If the layout cannot be revised to accommodate larger species trees then compact / narrower form trees (eg Acer campestre 'Elsrijk' & Acer lobelii) may be more suited to constricted / urban sites

The proposed sizes given for new trees – 25-30cm girth – these will provide instant impact but will require huge amounts of aftercare / maintenance to ensure survival. If this is the proposal then sufficient funds must be set aside for aftercare / watering (min 5 yrs)

SUDS / trees within hardsurfacing: Cellular underground systems should be used to ensure adequate soil / growing conditions to new urban plantings (for example Silva Cell / DeepRoot, StrataCell / GreenBlue Urban)

LBH Waste Officer

Waste strategy is acceptable. No objection

LBH Economic Development

The Economic Development Team has no specific comments to make on the application. As a major application, we will be seeking the following to be included in any s106 agreement:

- Construction Training – a requirement to produce a training and employment plan and provide a financial contribution
- Local Supplier targets

LBH Vehicles Crossings Officer

No objections as the access to the car park is existing.

LBH Lighting Officer

A comprehensive Lighting Design Report has been submitted, including Lighting Masterplan, Technical & Environmental Requirements, Character Areas & Typologies and Luminaire Schedules. The developer has confirmed the use of numerous luminaires for both functional and aesthetic purposes within designated areas, as indicated on the proposed Luminaire Schedule

No lighting design calculations have been provided at this stage, including the average maintained horizontal illuminance levels or Isolux contours for any overspill horizontal illuminance to indicate anticipated levels to the properties bordering the development on both sides, but indicated a range of average maintained horizontal illuminance levels for the primary traffic route, pedestrian zone and car park area at 10 Lux Eav/3 Lux Emin, 5 Lux Eav/1 Lux Emin and 20 Lux Eav respectively.

The developer has indicated a Classification P2 for the primary traffic route, which is higher than usual for residential roads within the borough and will need to be moderated for any public maintained/adoptable areas. The Developer has confirmed that the design has been undertaken in conjunction with the Institution of Lighting Professionals, Guidance Notes for the Reduction of Light Pollution and indicated that the installation has been designed to meet the requirements of “BREEAM, New Construction and Communities 2018 (Section Ene 03 – External Lighting Criteria) and (Section SE16 – Light Pollution), which include the recommendation that efficiency is maintained and light pollution must be minimised.

Furthermore, the Developer has also confirmed alternative design guidelines BS EN 12464-2 General Circulation Area at Outdoor Workspaces, CIBSE Outdoor Lighting Guides and SLL Lighting Guide, which are acceptable. It should also be acknowledged that any new introduction of lighting in what is currently an unlit, partially lit area will have an initial impact on the location, as it is a change within the environment.

For sustainability, the developer has indicated that all external lighting (except safety and security lighting) is automatically switched off between 11.00pm – 07.00 am nominal hours of operation, I assume that the installations are controlled by Photocell – (Dusk to Dawn) or Time clock, as for standard public/street lighting operating hours. Safety and security lighting complies with lower levels of ILP Table 2 Guidance between 11.00pm – 07.00 am nominal hours

The wall mounted bulkhead luminaires on the private apartment balconies are manually controlled from each individual property. Any further opportunity for the reduction of overspill lighting/visual impact by the use of luminaire baffles/louvres and/or additional screening by trees during landscaping would lessen the impact.

Transport for London Spatial Planning Team

The Canons Park Station Car Park proposed development site located on the existing NCP public car park and is bounded to the north by Canons Park, to the east by Donnefield Avenue, to the south by commercial units and to the west by the Jubilee line railway. The 79, 340 and 186 bus services call directly outside Canons Park station. The Public Transport Access Level (PTAL) for this site is 3, on a scale of 0-6b, where 6b is the highest.

The development is car free, which is strongly supported. A commuter Cycle Hub for 71 bikes is provided, which will encourage active travel.

The application is supported by Healthy Streets Transport Assessment and includes an Active Travel Zone assessment, where appropriate the Council should secure measures to support active travel and manage car demand.

Commuter Car Park

TfL strongly supports the reduction in commuter car parking, and would encourage further reduction where possible. This will contribute to the objectives of the Mayor's Transport Strategy, and Intend to Publish London Plan, to support mode shift away from car use and promote active travel. Of the circa 5,000 daily station users, less than 4% use the station car park. Of those who park at the station, a third live within 2km of the station, and 45% within 5km, making walking, cycling and the bus attractive alternatives.

Infrastructure Protection

The protection of the safe operation of the railway infrastructure is subject to a legal agreement between the scheme promoters, London Underground and Transport for London. Subject to fulfilling these obligations, the development does not represent an undue risk to the safe operation of the railway. This should take account of the potential scheme to provide step-free and new lift tower to the southbound platform and associated construction worksite.

Noise and Agent of Change

In line with Intend to Publish London Plan Policy D13 Agent of Change, the accompanying noise assessment includes measures to reduce the impact of noise on future residents. These measures should be implemented and secured as part of the planning permission.

Delivery and Servicing and Construction Logistics Plan

A final Delivery and Servicing Plan (DSP) should be secured by condition. A Detailed Construction Logistics Plan (CLP) will also need to be secured by condition in accord with Mayor's Vision Zero, including promotion of safety through the application of Direct Vision standards and Freight Operators

Recognition Scheme, and other measures.

Travel Plan

A full Travel Plan should be secured through the Section 106 agreement.

TfL can confirm the proposed development accords with strategic transport policy in Intend to Publish London Plan and Mayor's Transport Strategy, subject to appropriate planning conditions, TfL would not object to the Council approving this application.

London Underground Limited

The applicant is in communication with London Underground Engineers with regard to the development. Subject to the applicant fulfilling their obligations to London Underground and Transport for London under the legal requirements between ourselves and the promoter of the development, we have no objection to make on this application.

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

Historic England

On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers.

The Gardens Trust

Currently the approach to the Grade II registered Canons Park (RPG) via Donnefield Avenue has no housing on the western side and the buildings are set back round greens to the east, giving a spacious feel to the approach to the RPG, and thus its setting and significance. The application site affects the setting of the RPG and the northern part of the proposed development lies within the Canons Park Estate Conservation Area (CA).

The height, a 7 storey building, and bulk of the flats will tower over any mature trees, let alone juvenile replacements if necessary, and cause harm to the views and setting of the Registered Park, contrary to the NPPF. This is also likely to adversely affect the setting of the Grade I St Lawrence Church which was rebuilt by Chandos as a private family chapel.

IN our opinion there is too little screening of the flats, most of the trees being along the railway edge, little along Donnefield Road where the flats are sited too close to the road, and non at all where the bulkier northern side of the development abuts the RPG. Such screening as there is relies on those trees on the eastern side of the road being retained.

There is a discrepancy and confusion as to the exact reduction in numbers of parking places. The travel plan shows 160 spaces down to 60 but elsewhere the

stated reduction is 102 car parking spaces, down from 156 to 54. Whichever is correct, it will lead to far more on road parking, especially as this assumes that all commuters will come either on foot, cycle or bus, which seems unrealistic. Until there is an extensive cycle network for commuters to cycle to the station, this will exacerbate an already poor situation.

In summary the GT objects to the application. We consider the proposed flats represent an overdevelopment of the site which is out of scale both with the character of the surrounding area with low rise housing, and harms the setting and views of the RPG. It will alter the skyline and bring extra noise, lighting and road traffic, contrary to the guidance in Historic England's GPA Note 3.2 'setting of heritage assets'. We consider the site is more suited to the development agreed in the local plan or could be suitable for some flats of perhaps 3 storeys in height, of a more sophisticated design with more screening and with more consideration being given to their siting as regards to their effect upon the RPG and the CA. Should your officers decide to approve this application we would hope to see conditions imposed which would benefit the management and upkeep of the RPG.

The London Parks and Garden Trust

Canons Park is included as grade II in the HE Register, added in 1998, and contains a number of significant listed structures. The park is principally of significance as the surviving fragment of the great C18th landscape garden laid out for the Duke and Duchess of Chandos. The estate is so-called after the Augustinian canons of St Bartholomew in Smithfield, who owned the Manor of Stanmore in 1086. The estate had various subsequent owners, notably Sir Thomas Plummer, who is thought to have sought the advice of Humphry Repton on the landscape. The last private owner was Sir Arthur du Cros, for whom formal Arts & Crafts style gardens were laid out by Charles Mallows. The estate was eventually broken up in the early C20th, with part of the land acquired by Harrow Council as a public park and 85 acres sold for The Canons Park Estate which has retained features of the earlier landscape.

According to the test dictated by NPPF2019, p196 – any development causing less than substantial harm to a designated heritage asset must still have that harm weighed against the public benefits of the proposal. The site is presently undeveloped but given the fact there are low-rise maisonnettes already opposite the site and a single house and small lodge adjacent, we can appreciate the precedent for residential development.

However, the proposed buildings are significantly higher than anything in existence and will loom over the top of the tree canopy making them highly visible across the historic landscape. Even more so at night the light from high floors will dominate the park landscape and potentially impact on wildlife, especially when added to the large increase in vehicle movements during the day. Overall, the impact of the development on the quiet, historic character of the site will be significant and to some extent harmful.

This harm could be mitigated greatly by reducing the height and footprint of the

buildings and reducing the number of households and their cumulative needs. In addition, the design of the buildings, their constituent materials, outline and construction are also completely out of keeping with the existing character and again this harm could be ameliorated by more sensitive architecture more responsive and accommodating of the existing surroundings.

The LPGT objects to this planning application on the following grounds:
The height, bulk and outline of the proposed buildings will have a harmful impact on the historic character of the park and be visible from many key locations within the park. The loss of the parking spaces serving the station will throw greater parking pressure on the surrounding area and potentially impact on the use of the park

Although we are not averse to a contemporary approach, the design of the proposed buildings is unsympathetic to the surrounding existing architecture and harmful to the present character.

Conservation Area Advisory Committee (CAAC)

The north end of the site adjoins Canons Park CA. This is a major overdevelopment of the site. Views out of Canons Park which is both historically important and an important open space at the heart of the CA will be dominated in a southerly direction by the seven storey buildings. Easterly views from the most southerly area of the park and the adjacent sports ground (also part of the CA and historical landscape) will be similarly dominated. This will detract from both the character and amenity value of the CA. The loss of over 100 public parking spaces and the provision of only four disabled residential parking spaces, will result in massive overspill parking in the locality which may not directly impact on the CA but will undoubtedly detract from its immediate environment. The application should be refused.

Metropolitan Police Designing Out Crime Officer

The submitted plans would not achieve a secured by design accreditation due to the lack of gating between building B and Building C. Building's B and C both have deep under crofts designed in at ground level, both are over 10 meters deep. These under crofts have absolutely no natural surveillance at all. No building with an open unrestricted access, under croft area can achieve any type secured by design accreditation.

The applicant has confirmed that a gate would be installed between blocks b and c to address the concern. There are a number of different options which will work, with security tested and certified pedestrian and vehicle gates. I believe it should ease any issues around the required secured by design accreditation. This can easily be avoided by matching the car park management plan, to existing tested and certified security products, prior to approval and building work commencement

Environment Agency

No Comment

Thames Water

With regard to foul water sewerage and surface water networks, we would not have any objection to the above planning application, based on the information provided. The proposed development is located within 15 meters of our underground wastewater assets and as such we would like an informative attached to any approval granted.

Natural England

No Comment

Canons Park Estate Association

No Comment

Canons Park Residents Association (CAPRA)Representation 1

We wish to register on behalf of the members of CAPRA our strong objection to the proposed redevelopment of Canons Park Station car park to provide three 7 storey buildings giving 118 flats.

This proposed redevelopment would be a gross over-development of a small site in a narrow cul-de-sac in contravention of the planning policies in the current Harrow Core Strategy Development Management policies and Site Allocation plans. It would have a devastating effect on the open street scene and views of the historic Grade 2 listed Canons Park 18C landscape. It would be totally out of character and context with the open, low density, low level suburban 'metroland' character of the area which consists of mainly detached and semidetached properties and an over-intensive use of the site.

The three bulky seven storey buildings of flats, with little amenity space, will have a detrimental and devastating effect on the residential amenity with overlooking, loss of light and privacy of the surrounding properties. Loss of parking spaces in the station car park will inconvenience commuters, reduce access to Canons Park and local sports facilities and put pressure on local roads especially on Wembley Event days. There will also be a knock-on effect for emergency services and delivery vehicles, with increased delivery services and lack of parking and passing space in the narrow road which has a locally accepted dangerous junction with Whitchurch Lane.

A number of much smaller local planning applications have been restricted / refused due to the heritage aspects / impacts on the area, so how can this proposal even be considered?

Finally there is a chronic lack of infrastructure in the area and along with the development at Stanmore Place this proposal will only make matters worse:- the area cannot cope.

Representation 2

I wish to register CAPRA's total opposition and objection to this incongruous project which defies all planning norms and which constitutes a grotesque over-

development, totally out of character and scale to the area and especially disastrous to the residents of Donnefield Road and to the whole of Canons Park environs. While recognising the general need for really affordable housing for London, this is the wrong site, as it provides vital car-parking that serves a wide area and is necessary to the functioning of the transport system of TfL and for preserving the quality of life in a fast deteriorating environment of Canons Park.

The main reasons for our objection, with reference to both Harrow Core Strategy (2012) and The National Planning Policy Framework (2019):

1) GENERAL: HCS (2012) versus NPPF (2019)

While the Harrow Core Strategy (2012) is very clear and reasonable over what should be built on this site, the planners and Council may feel emboldened to apply NPPF (2019) which implies that the greater benefit for need for housing should override any other planning consideration. But they cannot apply a wider benefit to a whole Borough that will override the detrimental impact that the development will have to the existing immediate residents and the local area relating to the proposed site.

The Draft London Plan NPPF 2019 has not been widely disseminated, and is so full of bureaucratic jargon that lays an emphasis mainly on housing target numbers and cramming the maximum number of units on small sites without highlighting good design or context or the impact or relation of the type of development on the surrounding environment. This type of ‘target planning’ has been disastrous in the past and has created problems of overcrowding and unacceptable impact on adjoining residential streets. HCS (2012) seems more sensible in proposing that this site is suitable for 17 homes along the existing street “and retention of adequate car parking to serve the station.”

While recognising Harrow’s affordable housing need, it has been exacerbated by the approval of huge major developments that were targeting the high end housing market (cf. the damaging luxury Elysian development in Stanmore with no affordable housing) and were allowed to provide a smattering of ‘affordable units’ over decades. While this current proposal has the still-to-be-adjudicated so-called ‘affordable’ rental and sale units, one cannot cram such a huge number of units on every site without taking the local context and character into consideration. The quality of life and good design are very important, including the impact on the existing population around the area. This proposal fails to achieve the necessary high standards required.

1. Consultation:

The architects say the design was developed with extensive consultation with the local community, yet has shown no substantial change to the design despite strong protests from residents and institutions in Donnefield Road and in the wider area. The scheme was progressed and developed in relative secrecy with no intention, as the architects confirm, to alter the basic essentials of the design, obviously dictated by the politicians and planners. It is a disgrace that the “extensive consultation with the planning officers” has produced such a grotesque and disastrous scheme that will be detrimental to the whole

atmosphere and environment that relates to the park.

2. Car Parking

The absurd practice of providing no car spaces for residents, pushes the traffic problem onto surrounding streets that are already traffic ridden with widespread restricted parking. Reducing car parking provision for the public again creates overcrowding on surrounding neighbourhoods. No solution has been proposed to the removal of this major repository of car-parking for the nearby Hive, for Wembley Events, and for commuters needing to refrain from taking their cars into central London. Alternative possible schemes retaining the existing car park with housing on top, or by burying the car park in a basement, with housing over it, should have been explored.

As required by allocation H17 in HCS (2012), the proposal must also provide adequate parking to serve the station. The submitted Transport Assessment demonstrates that 80% of the existing parking spaces are occupied by 9am (equating to 130 spaces). As such, there is a clear need for the continued provision of over 100 parking spaces on the site. The only justification given to reduce the number of spaces by over 100 (from 162 to 60), is that some commuters surveyed could travel by other means or routes. As such, the report provides an assessment of capacity for car parks within a 15 minute walk of the site which might be available to accommodate overflow capacity. Its highly unlikely that any commuter or visitor would walk 15 minutes on top of their existing journey time, and we consider this to be an overall under-provision of parking for the site which contradicts allocation H17. But there are relatively few available spaces for car parking, even within 15 minutes of the Station.

3) Transport Impact

It is surprising that no provision, as a priority, has been made in such a drastic scheme, for lifts up to the platforms of Canons Park Station, except in the distant future when the ambulance servicing station is possibly relocated, to be replaced by yet another horrendous seven story building! Elderly and disabled people are not properly catered for under the Disability Discrimination Act.

No suitable justification is provided for the significant loss of car parking spaces associated with the station. Despite amendments to the proposals, the resulting scheme will still encourage a significant increase in vehicles along Donnefield Avenue with the car park entrance located halfway down. Furthermore, as stated in the Transport Assessment this will significantly increase on event days at Wembley. Its highlighted solution to the increase in vehicles will be the 'spare' capacity of on-street car parking on Donnefield Avenue and the surrounding roads. This directly conflicts with Policy DM 42 which resists development which would create significant on-street parking problems. Accordingly the loss of the existing car park has not been fully considered in relation to the impact on the surrounding area.

The proposed use of Donnefield Avenue for all servicing and deliveries is also entirely inappropriate for a scheme of this scale. Being the sole access to the Canons Park Activity Centre as well as a number of residential dwellings (and

the main access to Canons Park), the use of this road (which will only be 4.1m wide once amended for the proposal) by a 3.7m wide refuse vehicle will building all traffic movements and access causing huge disruption whilst the vehicle collects waste associated with 118 dwellings (in three separate bin collection areas). We also query how the refuse vehicle will turn around on Donnefield Avenue in the absence of any turning circle on the road.

The assessment has also failed to consider the impact of the proposal on the adjacent ambulance centre in terms of emergency vehicle movements.

3) Overdevelopment.

It is patently obvious that this sliver of a site is crammed with a much-too-high urban type of development that is entirely unsuitable in this location.

Whilst it is acknowledged that the site is allocated for partial residential development in accordance with Allocation H17, the proposed quantum of development is seven times greater than envisaged by the allocation. We consider this constitutes an overdevelopment of the site. which is required (as per H17) to provide adequate car parking to serve the station and a sensitive response to nearby heritage assets, neighbouring properties and nature conservation areas.

In addition to the above, we consider the proposal to constitute overdevelopment of the plot, as it fails to provide sufficient amenity and child's play space for the quantum of development proposed. By only providing 274 sq. m of amenity space on site (combined for children and adults) the proposal falls short of even the child's play space requirement for this area (based on mix proposed) of 471. 3 sq. m. There is limited opportunity for landscaping within the development and this gives the overall impression of the development being constrained on its plot.

The buildings are also placed within very close proximity to one another with Buildings B and C having a separation distance of just 12m, this causes concerns in respect of overlooking between the buildings as well as the quality of accommodation proposed in terms of outlook, internal daylight and sunlight. The Daylight and Sunlight Report by GIA confirms that 14% of rooms within the development will not achieve BRE Average Daylight requirements. This, again, indicates an overdevelopment of the plot as the proposed accommodation is not able to achieve a reasonable level of daylighting despite having very few surrounding constraints.

4) Design Aspects

Generally the architectural design of the scheme is rather pedestrian and severe, and does not relate to the 1930s feel of the station or the housing opposite. The dual aspect of the two larger buildings makes the flats on the western side face the embankment of the station and would be subject to continual noise and pollution. The elevation of the buildings on this side are bleak, with huge walls of brickwork reminiscent of tenement slum buildings.

The buildings do not have a 'horizontal emphasis' because they are crammed all along the narrow site, on very narrow already congested road. They are depressingly vertical and crush anyone who walks down the narrow pavement with the cliff barely a metre away from the pavement line. Using brick in such a mass is oppressive and creates more of the look of prison buildings than the suburban two and three storey housing that fits the scale and character of the area.

The entrance halls, with tiling and metal balustrades for the staircases would be very noisy and look rather clinical. The internal corridors would be dreary, dark and claustrophobic.

The development will produce a far from a "Healthy Street' with huge traffic, cycle and pedestrian congestion, with no decent manoeuvring space for refuse, emergency, delivery vehicles. To have one refuse chamber for each building will make it difficult for residents to organise their rubbish for bringing down seven storeys, and could cause smells and overflowing at street level.

Furthermore, so many units will put a huge strain on already overloaded statutory services, and it will make it difficult to find more GP surgeries and schools to cater for such a huge influx of families.

5) Amenity Space

The community space and pocket park are derisory, located between the gable ends of two six/seven storey buildings and certainly do not cater for community space for such a massive development, even if the flats have private balconies.

By only providing 274 sq. m of amenity space on site (combined for children and adults) the proposal falls short of even the child's play space requirement for this area (based on mix proposed) of 471. 3 sq. m. There is limited opportunity for landscaping within the development and this gives the overall impression of the development being constrained on its plot.

The narrow play-on-the-way spaces with such a large population from the flats and the huge number of bicycles will actually obstruct and be dangerous for pedestrians using the road and on the way to the park, and will affect the amenity of privacy and outlook of existing residents of Donnefield Road. They will certainly not reap the benefits of such a huge influx of flat dwellers.

6) Character & Scale Of The Local Area

The proposed development is entirely out of context with the prevailing patterns of development in the locality and fails to respond to the sensitive character of the area. The proposed seven storey buildings appear at odds with the existing 2-3 storey properties along Donnefield Avenue and entirely incongruous in the context of the Listed Canons Park. Accordingly, we consider that the proposed height and massing of the development contravenes Policy DM1 of the Development Management Plan which requires due regard for the site context as well as the provision of appropriate space around buildings and consideration of the visual impact of the development from within buildings and outdoor

spaces.

Sadly the design of the buildings in 7 storey mansion buildings is totally out of character with the suburban nature of the area and the large number of units will be unsustainable in such a small space. It will wreck the whole sense of what Canons Park is about. There is so much building coverage of the site that leaves little space for generous landscaping or tree planting, even with removing the bulk of existing trees on the northern part of the site. Compare the generous space in front of the two and three storey flats opposite, with the only 1 metre set-back in front of the oppressive cliff of brick housing that will dominate and overlook the existing flats and ruin the pastoral views and 18th Century landscape of Canons Park of almost prime importance in historic parks in the UK.

7) Heritage Aspects

The impact on nearby heritage assets is best considered in the context of the submitted Heritage Report and Townscape and Visual Assessment. The Canons Park Conservation Area view particularly is noted as having a medium to high townscape value, as well as being essential to the setting of the Grade II Listed Mansion and Walled Gardens. Arguably Viewpoint 4 gives the best image of this context and has been omitted from the assessment which is unfortunate. Notwithstanding, Viewpoint 5 provides a helpful context and the assessment concludes that this view would feature a medium to high level of impact on a view which is noted as protected and sensitive. On this basis, the proposal cannot be considered to represent a sensitive response to the area, as required by allocation H17.

The heritage report on archaeology of the site is produced by MOLA via the commercial development consultancy CBRE which is done with the intention to “help our clients to achieve planning consent and discharge planning conditions” so cannot be seen as objective assessors of the heritage aspects. Their assessments are subjective and do not come to fair conclusions.

It is risible to claim that the design “embraces and complements the heritage setting of the site enlivening Donnefield Avenue and activating the entrance to Canons Park’ when such an overbearing and massive cliff towering over the narrow road, actually destroys the whole aspect of the site and the relationship with Canons Park.

The design simply is not “sympathetic or complementary to the historic context of the adjacent Canons Park” and MOLA leaves out important viewpoints, such as the view looking towards the site when entering from Whitchurch Lane, where in contrast to all the buildings of Arnold House and the playing pavilions, which respect the horizontal landscape of Canons Park, the proposed housing scheme of urban scaled mansion buildings will tower over the landscape, ruining the harmony and atmosphere of the park.

Both the Design Review Panel and Historic England in their assessments have recommended a reduction in the height of the scheme that would affect the

historic nature of the Park.

'The proposed new buildings would be visible in open views from the parkland. It is the feeling of seclusion and openness in the park that provides the conservation area with a large part of its special character and appearance as noted in the CAAMS. There is some concern that this proposal would then undermine this character given the height proposed and its proximity to these designed heritage assets....A further view north among the listed park structures might also be affected. In line with the NPPF any harm would need clear and convincing justification and great weight needs to be given to an asset's conservation.'

'The design should be amended to ensure the building better reflects the character of the surroundings.'

8) Environmental Aspects

Important parts of the site and also sections contiguous with the site in the northern section of the car park and the western section of the embankment are designated a Site of Importance for Natural Conservation (SINC) Grade II. These contain important species of wildlife including bats and other flora and fauna, which the study presented warns that the whole construction process can produce serious harm to the SINC.

The SINC nature of the site will be destroyed with the loss of a major belt of trees and the uprooting of almost all of the existing vegetation and the loss of individual trees that provided some shielding of the railway noise. Now residents of the proposed building will be jammed against the raised bank and exposed to the constant noise of trains passing.

9) Conclusion

From the evidence given above, it is clear that this scheme should be refused, and that another more modest scheme of no more than three storey's high as appropriate to the site and its historic and environmental importance should be explored, while retaining most of the existing car park spaces. This should be done with close consultation with the local residents and their approval before it goes back to the planning committee.

Friends of Canons Park

I am writing in my capacity as Chairman of the Friends of Canons Park and wish to register our objection to the proposed development of the Canons Park Station Car Park.

Canons Park is noted as having a medium to high townscape value as well as being essential to the setting of the Grade II Listed Mansion and Walled Garden. The proposed high rise development would bring an unacceptable impact on these heritage assets. The proposed development is entirely out of context with the prevailing patterns of development in the locality and does not fit with the sensitive character of the area. The new development consists of three 7 story buildings set against the existing 2 & 3 story properties along Donnefield Avenue and would be entirely out of place in the context of the listed park.

To comply with the National Policy Planning Framework any harm to the significance of a designated heritage asset should require clear & convincing justification. For a Grade II listed Parks or Gardens this justification should be exceptional.

The Harrow Sites Allocation Plan allocates the site for 17 new homes and the retention of adequate car parking to serve the station. The new proposal represents a nearly seven fold increase in the number of homes which is contrary to the Council's own planning policy document and represents a gross over development of the area.

The proposal also reduces the number of parking spaces from 162 to 60. This is also clearly contrary to the published policy of providing adequate car parking for the station. Given that there is a much larger development at Stanmore Station car park happening simultaneously, this will inevitably result in a huge rise in nuisance on-street parking in the surrounding area from commuters trying to access the underground system. The station car park also provides valuable parking for people attending events at Wembley, The Hive Football Ground and any events which are run in the park (including the regular 'Park Run' held every Saturday which has regularly attracted in excess of 150 runners).

Donnefield Avenue is a cul-de-sac and is the main access point into the Park for park maintenance vehicles and emergency vehicles should they be required. It is also the only access for the Canons Park Activity Centre (which uses coaches to transport children) as well as a number of residential properties. Should this proposal go ahead it will also be the only route to service the 118 new units with refuse collection, deliveries and services. The use of this road by wide vehicles such as refuse lorries or grocery delivery vans would building all traffic movements including any emergency vehicle trying to access the park.

For all the above reasons we consider this development to be inappropriate and should not be permitted to proceed

The Stanmore Society

Would detract from character and setting of CPCA. Views out of CP which is historically important and an important open space at the heart of the CA will be dominated in a southerly direction by proposed buildings. Easterly views will be similarly dominated which will detract from character and amenity of CA. station car park acts as a park and ride travelling into London or events at Wembley - will result in overspill parking. green spaces and openness are much appreciated by residents and visitors. Social infrastructure will be taken beyond breaking point

Harrow Friend's of the Earth

Harrow friends of the earth recognise the urgent need for genuinely affordable and carbon-neutral new family housing. We therefore support, in principle, well-designed schemes that satisfy this need on suitable brownfield sites with access to all sustainable modes of transport and close to local facilities. we therefore

support in principle the proposed housing development at Canons Park Station car-parl.

we consider the reduction in car parking and increase in cycle parking to be an added advantage of this scheme. reduction in car use has a vital role in addressing the climate emergency and in making the streets safer and healthier for cyclists and walkers. while the need of disabled people must always be a major consideration, in general people travelling to their local facilities, including stations, should be encouraged and enabled to make the journey by walking, cycling or using a local (zero-emissions) bus. Wherever such alternatives are available, car use should be actively discouraged.

we hope however, that consideration will be given to improving the development in the following ways:

- increasing the proportion of housing available at london affordable rents
- decreasing the amount of commuter parking to no more than the level specified at the exhibition
- providing a means of access to the station platforms from the car park and the new housing that can be used by people with mobility disabilities

However, considering the likely long-term implications of COvid-19 we believe that, among others, the following principles should be followed in any new significant housing development:

- there should be fewer new flats (especially high rise) and more family houses with gardens
- safe, convenient and preferably, car free -active travel- routes to local green space should be provided. Flats should preferably have direct access from outside. where this is not possible, communal entrances should allow for contactless use and staircases, lifts and corridors should be regularly cleaned and designed to allow for social distancing

Canons Ward councillors (Cllr Thakker, Cllr Jogia and Cllr Moshenson)

As Ward Councillors we would like to record our strong objection to the planning application. We urge the committee to reject the planning application for being over populated, lacking sufficient parking and damaging to the views of award winning park.

Loss of Light and overshadowing

The proposed buildings are overbearing on properties on Donnefield Avenue which is made of two and three storey properties. The proposed 7 storey properties are on the east side of the road casting long shadows over the neighbouring properties. The proposed buildings are far taller than the platforms of Canons Park station and are in proximity to the houses on the west side of the road.

Overlooking and Loss of Privacy

the site for the Canons Park station is tightly situated between properties in Donnefield Avenue, the station's platforms and bordering on the other side of the platforms, residential area of Cheyneys Ave. The proposed development

would overlook gardens and houses and its height would present a loss of privacy to nearby residents.

Parking and Traffic

The scheme itself proposes to be with zero space for cars, however the developers admit that there is nothing that would restrict residents from owning cars and parking them in nearby streets. Already congested for parking on most days and with multiple traffic and parking controls that were introduced to surrounding areas in the last decade, proposing that residents should park, if they so wish, in nearby streets would create undue burden on the traffic and parking conditions in surrounding streets, would require the Council to introduce further parking controls and increase the cost of enforcement in the area. This argument is founded in fact from existing schemes where the development of Hitchin Lane restricts the number of cars in the development and has led to drivers congesting nearby streets parking sometimes irresponsibly and unsociably.

Effect on Conservation Area / Visual Amenity

The proposed development looms over Canons Park an award winning park with historic importance that is currently dominated by the tower of St Lawrence's Church, a listed church with 900 years of history. The proposed towers would be clearly visible from the Spinney in the park, will dominate the skyline to the west of it and will obstruct the views of the church from the Canons Park station platform. Canons Park, which lends its name both to the station and the ward would be dwarfed in the shadow of these buildings.

Loss of Station Car Park

Canons Park station is a busy station that is serving predominantly commuters and spectators both to Barnet Football Club at the Hive and on Wembley event days. The loss of parking at the station would lead to greater congestion in nearby streets and would cause a significant issue for event days. The Council very much relies on the capacity of this car park to limit the number of people driving into London and Wembley and to spread the pressure on traffic. With the loss of the car park, drivers would be forced to either find a street parking on the already congested streets or venture into less served areas of the borough creating traffic, road safety and anti-social parking as they attempt to get to work or to Wembley.

While the developer's ambition to create additional affordable housing should be applauded, we believe that the current design of the scheme creates issues which should be resolved with due attention to the character, traffic and history of the area and that the applicant should offer a new plan that retains parking and has less visual impact on the surrounding area.

Canons Park Estate Residents Association

The blocks are too high and will look bulky and out of character certainly not convivial in a Grade 2 Conservation Area. No provision has been made to accommodate a lift nor an escalator for those who find it difficult to walk up nor those disabled and in a wheelchair.

Please accept this note on behalf of the Canons Park Estate as a refusal to the application for this development

Aylward Estate Residents Association

There should be no development of Canons Park Station car park – or indeed any station car park at all. The car park is full every day (in normal times) so there is evidently no lack of demand. The whole point of station car parks is to encourage people to journey into London by public transport, and to merely state that ‘people should use other forms of transport to get to the station’ is disingenuous. The whole scheme should be cancelled.

Navin Shah AM

I refer to the above application and confirm my objection on the following material planning grounds.

I welcome the application for the much-needed affordable housing in the borough and in principle site is a suitable location. However, there are aspects of the application which are fundamentally flawed, as explained below, and for those reasons I’m not able to support this application.

My major concern is the over-development due to the unacceptably high level of density resulting in unacceptable harm to the Grade II listed Historic Park and Garden which is also a designated Metropolitan Open Land located in the close proximity of the development site.

Neither I’m opposed to high densities or tall buildings, but they need to be ‘appropriate’ which in this case they are not. The section on ‘Housing Supply and Density’ of the committee report refers to Policy 3.4 and table 3.2 (density matrix) of the London Plan (2016). Applying the density matrix, as the committee report concedes, the proposal equates to 544 habitable rooms per hectare as against the range of 150 to 250 defined in the London Plan density matrix. So, the proposed density exceeds by double/triple the provision required/recommended in the matrix of the London Plan (2016).

Further density consideration is the ‘intend to publish version’ (2019) of the draft London Plan with its enshrined ‘design-led approach’ (Policy D3) which removes the density matrix and promotes higher density development in well connected locations. Given that the site has PTAL rating of-3 it is in a ‘moderate’ location. The report claims the proposal to have ‘robust justification for the development’. This is not so for the following reasons.

The LBH Design Officer comments in the committee report state ‘Front elevations are partially successful with limited rhythm and alignment of façade elements’. LBH Conservation officer in appraising the application states ‘The proposal would greatly undermine the character given the height proposed and its proximity to these designated heritage assets...’. S/he further states ‘it is only a reduction in height that could alleviate/remove the harm significantly particularly to the building nearest the park, This is recommended’. I accept that

the balconies on the north elevation have been removed but that's really a superficial change and does not address the issue of massing, the bulk and the harm.

None of the above in terms of level of the density and quality of design suggest that the scheme delivers anywhere near acceptable level of 'design led approach' to comply with the draft London Plan (2019) requirements. Weighing up the public benefits from the affordable housing against the demonstrable harm of the poorly designed application scheme and based on the evidence submitted above I urge the planning committee to refuse the application (on the grounds of excessive density resulting in overdevelopment, bulk and severe detriment to the Grade II listed Historic Park).

5.0 POLICIES

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

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

5.2 The Government has issued the National Planning Policy Framework [NPPF 2019] sets out the Government's planning policies for England and how these should be applied, and is a material consideration in the determination of this application.

5.3 In this instance, the Development Plan comprises The London Plan 2016 [LP] and the Local Development Framework [LDF]. The LDF comprises The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan 2013 [AAP], the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan [SALP] 2013 and Harrow Local Area Map 2013 [LAP].

5.4 While this application has been considered against the adopted London Plan (2016) policies, significant regard has also been given to policies in the Publication London Plan (2020), as this will replace the current London Plan (2016) when published and form part of the development plan for the Borough.

5.5 The Publication London Plan was originally published in draft form in December 2017 and subject to Examination in Public (EiP) with the Panel's report received in October 2019. The Secretary of State issued two sets of directions on policies in the subsequent London Plan (Intend to Publish Version) (2019). The Mayor of London has accepted the Secretary of State directions and has now sent the Publication London Plan (2020) to the Secretary of State for final approval to publish. As such, the entire Plan can be given significant weight. The Secretary of State has until the 1st February 2021 to either agree the Plan or issue further directives. Should the Publication London Plan (2020) be agreed by the Secretary of State, the Mayor of London will be in a position to publish it, thereby

superseding the London Plan (2016) and giving it full weight as part of the Council's development plan.

5.6 The Publication London Plan (2020) is a material planning consideration that holds significant weight in determining planning applications, with relevant policies referenced within the report below and a summary within Informative 1.

6.0 ASSESSMENT

6.1 The main issues are;

- Principle of the Development
- Housing Output
- Townscape, Character, and Design Quality
- Heritage Assets
- Residential Amenity and Accessibility
- Transport and Parking
- Landscape and Ecology
- Climate Change and the Environment
- Planning Obligations and Infrastructure

6.2 Principle of Development

6.2.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2016): 2.8
- The Publication London Plan (2020): GG2, H1
- Harrow Core Strategy (2012): CS1A, CS1H, CS1I, CS8I
- Site Allocations Development Plan Document (2013): Site H17

6.2.2 The London Plan sets out to meet London's growth with the boundaries of Greater London. To address a gap between projected housing requirements, including a backlog of need and identified capacity, the London Plan expresses housing targets as minima. Harrow's minimum housing target is 593 homes per annum over the period 2011-2021. Policy H1 of the Publication London Plan (2020) increases the minimum housing target to 802 homes per annum over the period 2020-2030.

6.2.3 Harrow's Core Strategy establishes a clear vision for the management of growth in the Borough over the Local Plan period (to 2026) and a framework for development in each district of the Borough. Policy CS1(A) directs growth to the Harrow and Wealdstone Opportunity Area and throughout the rest of the borough, within town centres and strategic, previously-developed sites. The policy provides for that growth to be managed in accordance with the relevant sub area policies. Policy CS8(I), for the Edgware and Burn Oak sub-area, encourages the redevelopment of identified, previously developed sites to collectively contribute at least 1,229 homes towards the Borough's housing allocation. This is to be brought forward in accordance with Core Policy CS1(H),

which details that the Area Action Plan for the Harrow & Wealdstone Opportunity Area, and the Site Allocations Development Plan Document for the rest of the Borough, will allocate sufficient previously developed land to deliver the required housing targets.

- 6.2.4 Within the context of planned growth across London, the proposal therefore accords with Harrow's vision for the development of the Borough as a whole and for the Edgware and Burnt Oak sub area. Specifically, the proposal for the provision of housing on the site is consistent with the Strategy's broader objective to meet development needs on previously developed land, and to do so in sustainable locations, without resorting to development on greenfield and garden land.

Delivery of Site Allocation H17

- 6.2.5 Turning to the detail of the site's allocation, it is included as Site H17 of the Harrow Site Allocations Development Plan Document (2013). The allocation is for a partial redevelopment of the site for residential purposes, while retaining adequate car parking provision, to continue to meet the demand generated by commuters and in connection with major events at Wembley stadium.
- 6.2.6 The site allocation includes an indicative figure of 17 homes for the residential use. The commentary to the site allocation details the housing capacity is indicative, based on half of the site being redeveloped for housing. The methodology for calculating the potential residential capacity of sites is explained at Appendix B of the Site Allocations Local Plan document; the appendix notes that housing capacity figure attributed to each site is indicative not prescriptive and that the actual number of dwellings that may be achieved on each site may be determined by many considerations, including design & layout, the size & type of homes to be provided and scheme viability.
- 6.2.7 In terms of output, the subject application proposes 118 units for the site, which is significantly higher than that envisioned under the site allocation. Within the strategic policy context and taking into account the indicative status of the housing capacity figure included in the site allocation, it is considered that the increase in the housing output of the site could still be considered acceptable.
- 6.2.8 The primary balance against the quantum of housing in terms of the site allocation lies with ensuring an appropriate quantum of car parking being re-provided. The commentary to the site allocation notes that any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere. The station car park currently provides 162 spaces. The subject application would retain 60 car parking spaces and would also provide a TfL Cycle Hub. While it is acknowledged that the provision of the Cycle Hub provides a (sui generis) is not identified in the allocation, officers acknowledge that this would be integral to support the modal shift to more sustainable methods of transport in arriving to Canons Park Underground Station, thereby supporting the requirement to retain sufficient

commuter parking. The transport and parking impacts of the proposal have been considered in detail within section 6.7 of the report. The Council's Highway Authority have concluded that a reduction in the public station car parking can be accepted, provided suitable mitigation measures are introduced, which are to be secured through appropriate planning obligations and conditions.

- 6.2.9 The proposal would acceptably deliver the residential component of the site allocation and re-provide an appropriate quantum of commuter car parking capacity on the site. The principle of the site's allocation in the Harrow Local Plan was in recognition of the site's potential to deliver residential development, helping to meet the Borough's projected needs in a way that is consistent with the Borough's spatial strategy. This includes the delivery of housing on brownfield land and directing growth to areas with good public transport accessibility. On this basis, Officers consider that the principle of development would be acceptable, and the proposal would comply with the relevant policies in this regard.

6.3 Housing Output

- 6.3.1 The relevant policies are:
- National Planning Policy Framework (2019)
 - The London Plan (2016): 3.3, 3.4, 3.8, 3.10, 3.11, 3.13,
 - The Publication London Plan (2020): GG4, H1, H4, H5, H6, H10
 - Harrow Core Strategy (2012): CS1I, CS1J, CS8I
 - Harrow Development Management Policies (2013): DM24
 - Mayor of London Affordable Housing and Viability Supplementary Planning Guidance (2017)
 - Mayor of London Housing Supplementary Planning Guidance (2016)

Affordable Housing, Mix and Tenure

- 6.3.2 Affordable Housing is detailed in the National Planning Policy Framework (2019) as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the definitions within the following: affordable housing for rent, starter homes, discounted market sales housing or other affordable routes to home ownership (including shared ownership).
- 6.3.3 The proposed development triggers an affordable housing requirement as it constitutes a major residential development. Policy H4 of the Publication London Plan (2020) sets out a strategic target for 50% of all new homes delivered across London to be genuinely affordable. The policy also specifically requires that 50% of the quantum of housing is delivered as an affordable product on public sector land.
- 6.3.4 Having regard to Harrow's local circumstances, Policy CS1(J) of the Core Strategy sets a Borough-wide target for 40% of all homes delivered over the plan period (to 2026) to be affordable, and calls for the maximum reasonable amount

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

6.3.5 In terms of tenure split, the strategic part of Policy 3.11 of the London Plan (2016) calls for 60% of affordable housing provision to be for social and affordable rent and for 40% to be for intermediate sale or rent. The Publication London Plan (2020), recognises that for some boroughs, a more broader mix of affordable housing tenures will be appropriate and therefore provides a degree of flexibility based in the overall tenure mix. Policy H6 of the Publication London Plan requires a minimum of 30% homes to be affordable rent or social rent, 30% to be intermediate products which meet the definition of genuinely affordable housing, and the remaining 40% to be determined by the borough as low cost rented homes or intermediate products.

6.3.6 The application proposes to deliver all the proposed residential units as affordable housing. By reason of offering more than 50% affordable housing, the application has followed the ‘fast track route’ (as set out in Policy H5 of the Publication London Plan), which allows applications to not be subject to an appraisal in relation to the Financial Viability of the scheme. The proposal would have the following tenure and unit mix:

Table 1: Tenure Mix

	Total Units	% of Total	Total Habitable Rooms	% of Total
London Affordable Rent	22	19%	99	29%
Shared Ownership	96	81%	248	71%
Total	118		347	

Table 2: Housing Mix

	1 Bed	2 Bed	3 Bed	Total (units)
London Affordable Rent	0	11	11	22
Shared Ownership	48	44	4	96
Total	48	55	15	118
Percentage Mix	41%	46%	13%	100%

- 6.3.7 In order to comply with the Core Strategy Policy requirement for 40% affordable housing on all the units proposed, this would equate to an approximate requirement of 47 units out of the 118 to be affordable. The Mayor's Affordable Housing SPG details that the percentage of affordable housing in a scheme should be measured by habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes. Having regard to this, the 40% requirement would be the equivalent to 139 rooms to be provided as affordable rent. When taking the policy compliant split (60/40) into account by habitable rooms, this would require approximately 83 rooms to be provided as London Affordable Rent and approximately 56 rooms to be provided as an intermediate tenure. The proposed 22 London Affordable Rent units would consist of two and three bed family units and would equate to the provision of 99 rooms (or 71% by habitable room) as London Affordable Rent. This exceeds the minimum policy compliant split as required by the Core Strategy Policy. Given the smaller unit sizes proposed for the Shared Ownership units, the required 56 rooms to complete the minimum 40% Core Strategy requirement could (for example) be made up by 19 x two bed Shared Ownership units.
- 6.3.8 In relation to the local requirement for 40% of the overall units to be affordable housing, and the appropriate tenure split within that, the proposed development would be compliant in this regard. In relation to the London Affordable Rent units, the provision family-sized units (2 bed and 3 bed units) would meet the priority need of the Borough and two of the London Affordable Rent units would also be wheelchair accessible, which is welcomed. Officers are therefore satisfied that the proposal would also comply in this respect. The remaining 208 habitable rooms (i.e corresponding number of units depending on the configuration of the policy compliant requirement intermediate housing provision above) would be offered as Shared Ownership.
- 6.3.9 The Harrow Strategic Housing Market Assessment was completed in 2018, which formed part of the West London Strategic Housing Market Assessment. In terms of affordable housing tenure, the report concludes that the need of 9,600 additional affordable dwellings over the 25 year period 2016-41 (an average of 384 per year). Of this, the demonstrable need is for 70% at social rent and then 30% as intermediate products. It is therefore regrettable that additional London Affordable Rent homes are not proposed, over and above those within the 40%

policy compliant element, as this tenure is in high demand in Harrow to meet priority housing need.

- 6.3.10 Notwithstanding the priority need for London Affordable Rent housing, Shared Ownership is nonetheless defined as an affordable housing product and it is therefore necessary to recognise that the scheme would nevertheless be delivering a 100% affordable scheme. The proposed Shared Ownership units would have a satisfactory mix which is skewed towards one and two bed units as set out in the Council's Planning Obligations SPD. However, as set out in the Publication London Plan (2020), these tenures would need to be genuinely affordable.
- 6.3.11 In order to demonstrate that the proposed Shared Ownership units would be genuinely affordable, the applicant has submitted an Affordable Housing Supplementary Note. This details the minimum income requirements for each of the unit types. It is acknowledged that the minimum income would comply with GLA requirements and the 1 bed units (comprising 50% of the shared ownership units) and the 2 bed units (comprising 46% of the shared ownership units) would be accessible and affordable to Harrow residents. The proposed 3 bed units would also have a lower rent of 1.8% (which is below the Mayor's cap of 2.75%). Furthermore, the applicant has agreed to a cascade mechanism which would offer the Shared Ownership units exclusively (for a period of no less than 3 months) to eligible purchasers whose primary place of residence at the date of purchasing the relevant Shared Ownership unit falls within the London Borough of Harrow. The cascade mechanism would also include an income cap to ensure the proposed tenure represents a genuinely affordable offer for Harrow residents.
- 6.3.12 The Affordable Housing Supplementary Note also provides a comparable example for the demand for Shared Ownership at a recently completed development on Burnt Oak Broadway by Catalyst for 46 units. The development on Burnt Oak Broadway suggested local demand for Shared Ownership (40% of purchasers within local postcodes). The predominant purchaser group was between the late 20s and early 30s, however, there was demand across all age demographics.
- 6.3.13 Officers consider that subject to securing the cascade mechanism and the income caps set out above, the proposed Shared Ownership tenure represents a genuinely affordable offer for Harrow residents. On this basis, the additional shared ownership units delivered above the policy requirements and the overall provision of 100% affordable housing, which includes a policy compliant level of family sized London Affordable Rent units, should be afforded moderate weight when considering the public benefits of the proposal.

Housing Supply and Density

- 6.3.14 London Plan and Local Plan policies on housing development must be viewed in the context of the forecast growth across London and Harrow's spatial strategy for managing growth locally over the plan period to 2026. These are set out in the Principle of Development section of this report (above). The proposal's

contribution to housing supply ensures that this previously developed and allocated site makes an appropriate contribution to the borough's housing need over the plan period to 2026 and towards fulfilling the Core Strategy's target for the Edgware and Burnt Oak sub area.

- 6.3.15 Furthermore, the regional policy context (policy H1 of the Publication London Plan) requires boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites with particular focus on sites with existing access levels (PTALs) 3-6 that are located within 800m distance of a station, and redevelopment of car parks and low-density retail parks and supermarkets as a source of capacity.
- 6.3.16 Policy 3.4 of the London Plan (2016) seeks to optimise housing output from development by applying the sustainable residential quality density matrix at Table 3.2 of the Plan. Within the definitions of the London Plan density matrix, the site is considered to have a suburban setting and has a PTAL of 3, indicating a good level of public transport accessibility. When applying the density matrix within the London Plan (table 3.2), the proposal would equate to a density of 185 units per hectare and 544 habitable rooms per hectare. This would evidently exceed the matrix range for suburban setting sites with PTALs of 2-3.
- 6.3.17 However, Paragraph 3.28 of the reasoned justification to Policy 3.4 makes it clear that the density matrix is only the start of planning for housing development and that it should not be applied mechanistically. Further guidance on how the matrix should be applied to proposals is set out in the Mayor's Housing SPG and this indicates that whilst the maximum of the ranges set out in the density matrix should not be taken as a given, reasons for exceeding them should be clearly demonstrated. In this instance the positive attributes of the scheme are considered to provide clear and robust justification for the development to the density proposed. These attributes include; the allocation of the brownfield site in the Local Plan, its sustainable location and current function as a car park, which is specifically identified as a source to increase housing growth capacity, the public benefit attributed to the provision of affordable housing, and the delivery of a high quality scheme.
- 6.3.18 Furthermore, the Publication London Plan (2020) removes the density matrix that was previously included in order to promote a design lead approach rather than the application of a prescriptive matrix. Policy GG2 of the Publication London Plan (2020) notes that higher density development should be promoted, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. The policy goes on to note that the appropriate density of a site should be arrived at through a design-led approach, which is set out in detail under Policy D3 of the draft Plan.
- 6.3.19 The design considerations of the development have been considered in detail within the subsequent sections of the report. As noted in the submitted Design and Access Statement, the application proposal has been the subject of extensive pre-application discussions with the Council and has evolved in response to design scrutiny following Design Review Panels and discussion with

Council Officers. It is considered that the proposed design of the site effectively optimises development on an accessible, brownfield site, whilst responding to the local context. The Publication London Plan (2020) and the approach embedded within the policies to optimise the capacity of sites, are a material planning consideration that hold significant weight.

- 6.3.20 It is acknowledged that some respondents to the application consultation have expressed concern about overdevelopment of the site. For the reasons set out above, and as the density proposed has been achieved using a design-led approach, officers consider that the density of the proposal would be acceptable. Furthermore, any significant reduction in the density of the development could constitute an under-utilisation of the site (in the context of growth), with implications for viability of the development and subsequent delivery of affordable housing.

Summary

- 6.3.21 The proposed development would bring forward 118 units of housing, all of which would be affordable, and would therefore make a valuable contribution towards the Government's objectives of significantly boosting the supply of housing and meeting the housing needs of all. The absolute number of units and habitable rooms proposed as affordable housing in the application is greatly in excess of the levels across Harrow and London as a whole, with some 17% of units secured across London in the past three years and approximately 21% of units secured within the Harrow.
- 6.3.22 As to the split of tenures, the application would deliver 22 family sized London Affordable Rent units, which is the most affordable of all the tenures and the priority need within the Borough. In terms of the policy requirement provision and tenure split, the London Affordable Rented provision would represent 71% of the required policy compliant offer on a habitable room basis, with the remaining 29% coming forward as Shared Ownership (intermediate housing tenure). The remaining 60% of units would be offered as Shared Ownership units, with affordability aligned to local household incomes and local needs. The proposed affordable housing offer therefore goes beyond the policy requirements of the borough and the Mayor's requirements.
- 6.3.23 The delivery of 118 new affordable-tenure homes (including the additional units above policy requirements) is considered to constitute a public benefit which contributes to the achievement of local policies, the strategic level need for new (affordable) homes for London and the Government's policy objective of boosting significantly the supply of homes.

6.4 Townscape, Character, and Design Quality

6.4.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2016): 7.1, 7.3, 7.4, 7.5, 7.6
- The Publication London Plan (2020): D1, D3, D4, D8
- Harrow Core Strategy (2012): CS1B, CS1E
- Harrow Development Management Policies (2013): DM1, DM2,
- Residential Design Guide Supplementary Planning Document (2010)

Context and Layout

6.4.2 As set out in the site allocation H17, any proposal for the site would need to retain adequate car parking provision to continue to meet the demand generated by commuters and in connection with major events at Wembley Stadium. Further key constraints of the site include the railway embankment which is sited immediately to the west of the application site, the need for a TfL maintenance strip along that boundary, the layout of the development to allow for emergency TfL Crane access to the railway embankment and the adjoining heritage designations to the north of the site. Consideration would also need to be given to any future development of adjacent TfL land to the south of the site (currently occupied by the BEARS Ambulance centre).

6.4.3 The proposed development has been laid out to provide three, seven storey residential buildings that front Donnefield Avenue. The replacement car park spaces would be provided at surface level, partly within an undercroft (of buildings B and C) and towards the north-western part of the site. Furthermore, the proposed site layout would provide active frontages of the ground floor onto Donnefield Avenue that would provide a degree of natural surveillance over the public realm. The layout, in conjunction with the proposed public realm enhancements would frame the approach to Canons Park.

6.4.4 There would be a moderate gap of 9m and 13m between the buildings, while the northern elevation of building C would be set away 9m from the adjoining boundary with Canons Park. This would provide for a communal amenity space between buildings A and B, and to the north of building C. Furthermore, an outline study for the future development of the TfL land to the south of the application site has been included in the Design and Access statement. This satisfactorily demonstrates that the siting of building A would not prejudice any future development on that adjoining site and the delivery of step-free access to the platform could be delivered in the future.

6.4.5 Given the long, linear and tapering site, and the unique edge conditions to the west with the railway embankment, the proposed layout is considered to be appropriate for the site. The final layout, including the vehicular access point into the site, has been carefully considered in relation to the functional requirements of the proposed residential use and car park re-provision, and has been based on recommendations by design experts during the course of the development

process. Officers are therefore satisfied that the proposal would achieve a high standard of development in relation to the layout considerations.

Scale, Massing and Design

- 6.4.6 The proposed buildings would have a rectangular form and would be seven storeys in height. In the context of the two and three storey buildings within the proximity of the application site, the proposed development would introduce a development of contrasting scale and height, that would be a notable transition from the existing and prevailing building heights within the locality. As detailed in the townscape assessment below, this would contribute to a perceived change in townscape character from some viewpoints within the locality.
- 6.4.7 However, it is important not to conflate visibility with harm. The proposed residential buildings, although unquestionably larger than the surrounding built form, would nonetheless benefit from a high degree of articulation. Visual relief would be afforded through the gaps between the buildings and the set-back of the front elevation of the seventh floor would help break the mass and reduce the prominence of the scale and bulk of the proposed buildings.
- 6.4.8 Paragraph 129 of the NPPF (2019) details that Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements. In assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels. Policy D4 of the Publication London Plan (2020) supports the use of the design review process to ensure design scrutiny.
- 6.4.9 Three Design Review Panels (DRP's) were convened prior to the submission of the planning application. The purpose of these DRP's was to enable a panel of experts to consider the scheme and to provide officers with their opinion on the design quality of the proposed development. The design of the proposed development has evolved from that conceived during the early stages of the planning process, taking on board recommendations by the DRP and Council Officers. The proposed design has addressed the key considerations raised in the design review comments by;
- Relocating the entrance of the station car park further south, so that it is no longer adjacent to the entrance with Canons Park. This would reduce the dominating effect of vehicles adjacent to the park entrance
 - The provision of deck access to building A
 - Improving articulation of the façade and a more responsive and sympathetic elevation fronting Canons Park
 - Providing of oblique views through the curved, semi-projecting balconies
 - Increasing space between the buildings
 - Activating the ground floor uses
 - Providing a greater threshold from building line to pavement

- Outlining how the land to the south of the site would be integrated in the future phase of development

- 6.4.10 While the proposal would result in a notable transition from the existing two and three storey heights established within the immediate locality, the DRP experts have expressed their comfort with the height and massing distribution of the proposed buildings.
- 6.4.11 In terms of the immediate development context, it is appreciated that 1-20 Canons Park Close has extent planning permission for an additional floor to that building (LPA reference P/1277/20). This would give the central component a four-storey height and the winged projections a 3 storey height. The hipped roof form to the extensions would also increase the massing further. Additionally, 21-40 Canons Park Close has had planning permission previously granted (LPA reference P/2545/05/CFU/3510). While that permission was never implemented, there is no reason to consider that a similar proposal may not also be capable of support. These buildings could also potentially be eligible for a two-storey upward extensions under Part 20, Class A of the (General Permitted Development) (England) Order 2015 which may result in a five-storey central component and four-storey winged component. While the height and massing proposed on the subject site has been assessed on its own merits, it is nonetheless important to recognise that the prevailing 2 and 3 storey buildings heights within Donnefield Avenue could also be subject to change, and should therefore not be determinative or serve as the benchmark for what would be deemed acceptable massing on the application site.
- 6.4.12 It is acknowledged that some recommendations by the Panel could not be fulfilled, such as; the provision of a non-residential use (e.g a café) adjacent to Canons Park, a shared surface treatment for Donnefield Avenue, increased 'doorstep' play, and relocation the cycle hub to the TfL land to the south of the site. However, officers acknowledge that a number of these recommendations were outside the control of the applicant and would also contrast with other material considerations (e.g highway impacts). Notwithstanding this, the DPR Chair Review response acknowledges the efforts to address key issues for the site, which has great potential to work as a true residential cul-de-sac.
- 6.4.13 The proposed scale, massing and design of the development has been informed and conceived through a design-led approach which was subject to design scrutiny as advocated by Policies GG2, D3 and D4 of the Publication London Plan (2020). A key objective of the Local Plan is to ensure that all developments are of a high standard of design and layout. Various experts in the design field have considered the scheme and have not raised any fundamental objections to the massing or design. Officers are mindful of this expert advice and consider that the proposed buildings would respond to the challenging constraints of the site and optimise the site capacity through the design-led approach.

Architectural Quality and Appearance

- 6.4.14 The proposed buildings, by virtue of their height and siting, would be visible from a number of viewpoints within the locality. The applicant has given considerable thought to the proposed elevational character and architectural detailing with the aspiration to create reposed elevations while using materials which relate to the surrounding residential buildings. Particular attention was also given to the design of the northern elevation of building C, which would address Canons Park. The DRP experts and Council officers felt that the architectural character of this elevation should respond appropriately to the Park and as a result, the park-facing gable was therefore developed to offer a civic elevation. Through its simplicity in form and careful material palette, the elevation would respond sympathetically to its historic setting.
- 6.4.15 A bold, articulated, high-quality masonry palette with complementary brick tones and textures would be accented with limited precast detailing around entrances, sills, lintels and copings. The predominant use of brick would ensure longevity and allow the proposal to sit comfortably in the context.
- 6.4.16 The use of floor-to-ceiling high windows in most elevations and glazed stair wells would help to animate the buildings and give vertical emphasis. The street facing balconies are semi-projecting and separated by a masonry pier. This sets up a regular vertical rhythm to help break the overall massing and provides articulation, whilst offering oblique views towards Canons Park. Window reveals (setting back the window from the outer face of the exterior elevation) is a valuable design feature which further articulates elevations with depth, light and shade, and are proposed as part of the detailed treatment of the buildings. The proposed front elevations are successful with limited rhythm and alignment of façade elements. The proposal would also provide generously spaced and high-quality entrance lobbies for the residential buildings, with rich tiling and terrazzo elements that would enliven the shared spaces.
- 6.4.17 Every indication is that the design and finish of the development would, if approved, be carried out to a high standard. The final choice of materials and the details described are critical to achieving the high-quality finish that has been promised, ensuring that the development exploits this opportunity to reinforce and enhance the positive attributes of the local built environment and is sympathetic to the setting of Canons Park. It is therefore considered that the materials and other detailed aspects of the design, as set out in the Applicant's Design & Access Statement, should be controlled by conditions of planning permission to ensure the development maintains its attractiveness over the lifetime of the development. As a safeguard, it is proposed to include in the section 106 Planning Obligation, to ensure that the quality of the architecture and finish are preserved through all phases of development including delivery on site. This will be achieved through an agreement on the level of architectural expertise retained throughout the construction phase or a design code.

Townscape and Views

- 6.4.18 Townscape refers to the landscape within the built up area, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces. A Townscape and Visual Appraisal (TVIA) produced by Landscape Visual has been submitted with the application. This uses qualitative and quantitative methods to consider the principal effects of the development on townscape and views found within a 0.3km radius of the application site.
- 6.4.19 In setting out the evolution of the surrounding townscape, the submitted TVIA notes that the townscape of the surrounding area developed in the 1930s around Canons Park underground station, with the suburban residential properties to the south and west of the Site being present on the 1935 OS Map. The two residential blocks opposite the application site were constructed in the early 1960s, while the layout of the car park was extended northwards to the boundary of Canons Park in 1999. The visibility of the Site from the surrounding area is generally limited to the immediate context due to the topography, surrounding buildings and vegetation. The railway embankment screens views from the west and dense tree planting around the north and north-eastern boundaries of the site, screens views to the car park from Canons Park itself.
- 6.4.20 In terms of character areas, Table 4.1 of the TVIA considers their respective quality and value (using the methodology detailed in the report). Canons Park and the Conservation Area are considered to have a medium to high value, while the adjoining TfL land to the south and the retail/commercial parade on Whitchurch Lane are deemed to have a low value. The Metroland housing character areas, such as Howberry Road and Whitchurch lane are considered to have medium to low value.
- 6.4.21 The TVIA considers eight different viewpoints, utilising accurate wirelines and block-rendered visuals to inform the townscape and visual appraisal. The Appraisal notes that at viewpoints 1 and 6 (within the immediate setting looking north and south along Donnefield Avenue) the proposed buildings would be prominent additions to the street. The scheme would therefore contribute to a perceived change in townscape character, reducing the influence of utilitarian townscape elements (the fenced station parking) and increasing the influence of residential apartment buildings of taller scale than existing buildings. Furthermore, the addition of high quality and carefully conceived apartment buildings to the local townscape would be positive and the proposed landscaping measures would improve the public realm.
- 6.4.22 In relation to Canons Park, the TVIA notes that in views from the east of the site (viewpoints 2 and 3), there would be a contrast in scale between the existing and proposed buildings. However, the gaps between the buildings slightly reduce the impact on the skyline views and the views from the east of the site are sufficiently distant from the site for the proposed scale of change to be appropriate within the exiting features in view. From the area to the north of the site, the Park contains denser vegetation and would be noticeable new elements in views to the fringes of the park. In relation to views from the adjacent residential streets (viewpoint 1 and 7), the scale of the proposed buildings would be experienced in the most

channelled views (such as on Watersfield Way facing east), rising between houses or where partial views are visible over the roofs of houses. While this would have a moderate visual effect, the TVA considers that the addition of high quality and carefully conceived buildings to local views would be positive. Overall, the TVIA concludes that the proposal would make a beneficial contribution to the local townscape character and would have a largely positive but sometimes neutral effect on views.

- 6.4.23 The proposed development would not be within a landmark viewing corridor or the wider setting consultation area (as detailed in the Harrow Policies Map). Consequently, the proposed development would not have a harmful impact on the protected views and their landmark elements as set out in the relevant policies. In view of the above evidence and the conclusions reached in respect of a range of related matters elsewhere in this report, it is considered that the proposal would not be detrimental to townscape character.

Public Realm

- 6.4.24 The proposal incorporates a comprehensive landscape and public realm strategy, as detailed further in the report. The proposed enhancements would be inclusive, attractive, well-designed and accessible. Furthermore, the aspect of the proposed buildings and provision of residential units on the ground floor of buildings B and C would activate and define the public realm, providing appropriate levels of natural surveillance. The proposed works would provide street trees and soft landscape planting, which would also serve to support sustainable drainage measures and increase biodiversity. Appropriate street furniture is also proposed to improve pedestrian amenity and experience. For these reasons, officers are satisfied that the proposed public realm improvements would meet the objectives of the relevant policies.

Lifetime Neighbourhoods and Secure by Design

- 6.4.25 Occupiers of the proposed flats would benefit from close proximity to the shops and services available within the shopping parade on Whitchurch Lane, and those elsewhere, via public transport routes serving Canons Park Station. Furthermore, the proposal would significantly enhance the public realm, thereby improving the pedestrian and cyclist experience as an access route into Canons Park.
- 6.4.26 The Metropolitan Police Secure by Design Officer was consulted during the application and raised concerns with the deep undercrofts that are proposed, which could attract crime and anti-social behaviour if the development is appropriately secured. During the course of the application, the applicant has confirmed that a gate would be provided. This was reviewed by the Secure by Design Officer who has accepted the details could be confirmed through a pre-commencement planning condition. A pre-occupation condition is also attached to ensure the proposal achieved Secure by Design Accreditation.

Summary

- 6.4.27 The National Planning Policy Framework reiterates the Government's commitment to good design. However, the NPPF is also clear that local planning authorities should not attempt to impose architectural styles or particular tastes, and emphasises that good design goes beyond the consideration of visual appearance and architecture.
- 6.4.28 Officers acknowledge that several residents have raised an objection to the scale of the development, noting that it would be out of keeping with the suburban character of the locality. Furthermore, responses to the public consultation have also taken issue with the design, architectural treatment, siting and proximity of the building lines to the pedestrian footpath. Officers acknowledge that the proposal would create a change in impacts to the townscape. However, as set out above, it is considered that the proposal would introduce high quality architecture, materials and public realm to the site. The proposal has undergone robust design scrutiny and various experts in the design field, have concluded that the scale and height would not cause detriment to the urban context of the area.
- 6.4.29 As with any planning proposal, the consequential impacts in relation to character and appearance must be weighed in balance against all other relevant material planning considerations, as set out within the report. Overall, officers consider that the proposal has been well considered and would result in a high-quality development that would comply with the relevant policies. Any actual or perceived local adverse impacts on townscape would not outweigh the overall benefits of the proposal.

6.5 Heritage Assets

- 6.5.1 The relevant policies are:
- National Planning Policy Framework (2019)
 - The London Plan (2016): 7.8
 - The Publication London Plan (2020): HC1
 - Harrow Core Strategy (2012): CS1D
 - Harrow Development Management Policies (2013): DM7
 - Stanmore and Edgware Conservation Area Supplementary Planning Document (2013)

6.5.2 The application site is within the setting of Canons Park, which is a Grade II listed Registered Park and Garden. There are a number of designated assets within the park and the closest designated asset is the Grade I listed Church of St Lawrence, approximately 360m east/south-east of the site boundary. The detailed description for Canons Park is provided within the Historic England Database Listing (list number 1001394). Some of the key descriptions are reproduced below:

Location, Area, Boundaries, Landform, Setting

'The registered site comprises c 50ha of formal gardens and parkland surrounded by housing and other suburban development. The avenues running west from the park towards Marsh Lane, across the railway line, and running east along Canons Drive to Edgware High Street, have been retained'

Entrances and Approaches

'The principal approach to the North London Collegiate School is from Edgware High Street, via an entrance drive known as Canons Drive...There are three other entrances to the public park: one to the south at Whitchurch Lane, one to the south-west at Donnefield Avenue (both mid to late C20), and one to the west at Marsh Lane'

Principal Building

'the North London Collegiate School, formerly Canons House (listed grade II), stands at the northern end of the park, forming the main focus of the landscape'.

Park

The southern part of the registered parkland which includes allotment gardens and playing fields has a mid to late C20 functional path layout. Along the eastern park boundary is a woodland walk running through The Spinney, which dates back to Alexander Blackwell's early C18 layout of the park. The remains of the southern parkland such as the raised banks formerly flanking both sides of the avenue running towards the Church of Saint Lawrence, and along the woodland walk through the Spinney, are still visible. The avenue survived into the mid C20 but of the medieval church of Saint Lawrence (listed grade I), situated in the south-east corner of the park, only the west tower remains. The church was rebuilt by John in 1715 and dedicated in 1720, to become the Duke of Chandos' private estate chapel

Kitchen Garden

Some 70m south of the school, situated in the public park area, is a rectangular walled area. The brick walls (listed grade II) are the remains of the early C18 kitchen garden which formed part of James Brydges' layout for the garden at Canons Park. There are three entrance gates to this walled garden, namely on the north, west, and south sides. Since the early to mid C20 the kitchen garden has been called the George V Memorial Garden

- 6.5.3 The northern tip of the application site is within the Canons Park Estate Conservation Area (CA). The CA is described within the Conservation Area Appraisal and Management Strategy as follows:

The Canons Park Estate CA is an outstanding area given its special landscaping, openness, and good architecture. This is because it comprises a large part of the original Canons Park estate including the grade II listed mansion dating back to 1747 and surrounding landscaping. It has interesting histories attached to it, including associations with famous architects. The area includes a high quality formally planned Metroland estate in a largely 'Tudor revival' design and street layout within a green, sylvan setting that incorporates landscape features of the original estate, including two lakes, a historic avenue and abundant greenery. This landscaped setting lends a special soft, informal and in places, particularly along Canons Drive, a soft, verdant ambience. There is a good spacious and tranquil environment created by public and private open spaces and greenery. Similarly, adding to the area's importance is the range of key views towards landmark buildings, architectural qualities and across open greenery with tree avenues and picturesque ponds. It is the delicate balance of the above factors that achieves the area's special character

- 6.5.4 Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended requires having special regard to the desirability of preserving listed buildings or their settings and special attention being paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

- 6.5.5 In accordance with the requirements set out by Paragraph 189 of the NPPF, a Heritage Statement and Historic Environment Assessment produced by MOLA (Museum of London Archaeology) has been submitted with the application. The application is also accompanied by a Townscape and Visual Appraisal produced by Landscape Visual. The submitted Heritage Statement considers that the existing site makes no contribution to the setting of the Conservation Area or the setting of the listed Park. In relation to the impact of the proposal on the listed Park and CA, the Heritage Statement makes the following points:

- Canons Park Flats (on the eastern side of Donnefield Avenue) will create an existing visual buffer between the park and the proposed development and transition in scale of built form
- The main development within the park (the former Canons Park Mansion) is substantially distanced from the subject site, as are other significant historic structures which make up the park. The setting of King George V Memorial Gardens and the heritage assets comprising the individually listed former Canons Park House buildings (located in the northern extent of Canons Park) will remain secluded, with the proposed development unlikely to have any visibility from these areas.
- The addition of higher scale development on a single edge of the park will not affect the overall ability to appreciate and experience the 'openness' and 'seclusion' of the larger park which extends to the north.

- The upper storey of the proposed development is set back from the building edge and is a lighter colour brickwork to the bulk of the development, which greatly reduces the visibility of the upper storey, which will mitigate the impact of the overall scale of the development
- The proposed building is designed as an overall simple, modern and high-quality form within the wider setting of the Park and the CA. It is a sympathetic design response to its setting.
- The proposed development is considered likely to have a moderate heritage impact on some aspects/views within the park, due to the scale of the proposed development (which is presently openness), but the visibility of the site from the other surrounding areas of the park is generally limited to the immediate context due to the topography, surrounding buildings and vegetation.
- The bulk of the conservation area comprises Canons Park, with the potential heritage impact on the Park outlined above. The group of significant 1930s Metroland residential development to the east of the conservation area will be unaffected by the proposed development as there is no intervisibility between this cohesive residential area and the subject site.

6.5.6 The Conservation Area Appraisal Strategy sets out the ‘key views’ within the Canons Park Estate Conservation Area. In relation to the subject proposal, the potential identified views that might be impacted are the panoramic views towards the site from the east and in southerly views towards the site from the George V Memorial Garden or from the northern portion of the site, where the group of individually listed heritage assets are located. A series of verified views were undertaken and are provided within the Townscape and Visual Assessment. The relevant heritage views are identified as views 2, 3, 5 and 8. The Heritage Assessment provides the following commentary on the verified views:

Views 2 and 3 (from the east of the site and adjacent to the southern entrance along Whitchurch Lane)

The panorama view already comprises a visual buffer of intervening built form and landscape form (in the form of the existing metal fence, hedge and buildings in the distance). The proposed development will be viewed in the backdrop of the existing low-medium scale development on the south western edge of the park only and it is considered that the panorama view from this aspect is not a more significant view of the park. The more significant direct long distance and short distance views to significant assets within the park will be conserved

View 5 (View from Canons Park central amenity parkland area looking towards Donnfield Avenue park entrance/exit)

The proposed development will be visible in the backdrop of existing vegetation and at a distance from this aspect. Further, the design of the northern elevation has been well considered, with sympathetic façade articulation, responsive to the edge of the park. Although the proposed development is visible from this aspect, the development will not impact upon the overall sense and atmosphere of ‘openness and greenery’ across the remainder of the views within the park.

View 8 (View from Canons Park near the walled garden)

The proposed development will not be visible from the George V Memorial Garden or from the northern portion of the park, where the group of individually listed heritage assets are located. The site is too far distanced from this aspect and is screened by intervening landscape and tree coverage. The tranquillity and seclusion of the memorial garden will therefore be unaffected by the proposed development.

- 6.5.7 The Heritage Statement concludes that the proposal would provide a high quality and responsive development to its heritage context. It would be suitably distanced from key buildings, features and elements within the park; whose individual significance and setting would be wholly conserved by the proposed development. Furthermore, the proposed development would be on the edge of Canons Park, which has previously been subject to development and the proposal would therefore be set in a backdrop of intervening built and landscape form and screened by trees. The proposed development would therefore not affect the overall sense of 'openness' and areas of seclusion across the park. While the proposed development will have a minor impact on an identified panorama view (view 2), this view is of a 'lesser significance' in the park as it is previously been impacted by the identified existing fence, hedge and built form. Other more significant direct long and short distance views across the park will be unaffected. The proposed development would also be responsive to the established character of the Conservation Area.
- 6.5.8 For these reasons, the Heritage Statement considers that the proposed development is considered to have 'less than substantial harm' to the setting of Canons Park (and the Canons Park Conservation Area), due to the scale of the proposed development (with the existing car park currently contributing to openness). However, the Heritage Statement considers that the harm is at the lower end of the threshold and outweighed by the significant public benefits of the proposal. This would include the delivery of 118 affordable housing units, the delivery of a cycle hub and high-quality public realm, which would provide a significant enhancement to the approach of the Park from this point and mitigate the level of harm.
- 6.5.9 The application was referred to the Council's Conservation Officer who has reviewed application and supporting documents. The full consultation response is provided in the relevant subsection of the report above. However, the key points raised by the Council's Conservation Officer are as follows:
- The proposed new buildings would be visible in open views from the parkland. It is the feeling of seclusion and openness in the park that provides the conservation area and registered park and garden with a large part of its special character and appearance
 - The proposal would greatly undermine this character given the height proposed and its proximity to these designated heritage assets as well as the large amount of glazing and balconies facing the park. It would also be lit up at night.

- It is noted by the supporting documents that the development would not be visible as far north as the walled garden which is good but it seems it would be evident further south.
- The scale of the effect of the proposed new build in its setting is noted as 'large' in the Townscape Appraisal. The cross section in the Design and Access statement shows the proximity of The Lodge. Building C is too close to be screened and there is no space for 'buffer' planting. It would not be possible to provide meaningful soft landscape to screen or soften the view of the building
- In relation to view 5, the proposed development will be clearly visible from the listed Canons Park and The Lodge and will have a 'large' impact on the overall sense and atmosphere of 'openness and greenery' within the park. View 3 below shows a similar impact on openness, greenery and the present relative sense of isolation from built up surroundings, from this viewpoint in the conservation area and registered park and garden.
- It is only a reduction in height that could alleviate/ remove the harm significantly, particularly to the building nearest the park. This is recommended. However, otherwise amending the design to omit the balconies/reducing glazing facing the park would help, as would reducing the amount of glazing facing it. It is noted that there are public benefits to be weighed up against the harm but this should only enter the weighing up process if the design cannot be amended to avoid the harm but allow for the same benefits.

6.5.10 Historic England, the government's statutory advisers on heritage, were consulted on the application. The consultation response received on 18th June 2020 detailed that they did not wish to offer any comments, and suggested the local planning authority to seek the views of their own specialist conservation advisers, as relevant.

6.5.11 The Gardens Trust, in its role as a statutory consultee for proposals affecting a site listed by Historic England on their register of Parks and Gardens, were also consulted on the application. In the consultation response dated 23rd June 2020, The Garden Trust raised an objection to the application on the basis that the height and bulk of the development would represent an overdevelopment of the site which would be out of scale with the character of the surrounding area and would cause harm to the views and setting of the Registered Park and likely affect the setting of the Grade I St Lawrence Church. Furthermore, the proposal would alter the skyline and bring extra noise, lighting and road traffic. If the local planning authority was to decide to approve the application, the Garden Trust would hope to see conditions which would benefit the management and upkeep of the registered Park and Garden.

6.5.12 The London Parks & Gardens Trust (affiliated to the Gardens Trust) also raised an objection to the proposed development in the consultation response dated 17th June 2020. Again, it was considered that the height and bulk of the proposed buildings would have a harmful impact on the historic character of the park and would be visible from many key locations within the Park. Furthermore, the loss of parking spaces serving the station would throw greater parking pressure on

the surrounding area and potentially impact on the use of the Park. Finally, it was considered that the design of the proposed buildings would be unsympathetic to the surrounding existing architecture and character of the area. The consultation response did consider that the harm could be mitigated greatly by reducing the height and footprint of the buildings.

- 6.5.13 The Conservation Area Advisory Committee (CCAC) have also raised an objection to the proposal. In particular, the CAAC have advised that the proposal would be a major overdevelopment of the site and views out of Canons Park will be dominated in a southerly direction by the seven storey buildings. Easterly views from the most southerly area of the park and the adjacent sports ground (also part of the CA and historical landscape) will be similarly dominated. This will detract from both the character and amenity value of the CA. The CCA also consider that the loss of over public parking spaces and the provision of only four disabled residential parking spaces, will result in massive overspill parking in the locality which may not directly impact on the CA, but will undoubtedly detract from its immediate environment.
- 6.5.14 It is evident from the submitted documents and subsequent heritage consultation responses that there would be no direct harm to the heritage assets. Rather, the identified harm would be from the impact of the development on their significance derived from their setting. Both the submitted Heritage Statement accompanying the application and response from the Council's Conservation Officer consider that the proposal would result in less than substantial harm to the significance of the heritage assets.
- 6.5.15 In assessing the impact on significance, the key consideration is how important the aspect that would be affected (i.e the setting) is to its significance. It is accepted that the significance of Canons Park and the Conservation Area is derived from their historic landscaped character. In relation to the Park, this is exhibited through the grand, spacious, green and tranquil character of the public parks and gardens provide a sense of isolation and openness. The significance of the Canons Park Estate Conservation Area also relates to its good architecture and high quality formally planned Metroland estate, with a soft and verdant ambience. The significance is also reflected through the historical, aesthetic and communal value of the heritage assets.
- 6.5.16 Turning to the actual impacts, change to the setting would be as a result of the development of the existing surface car park, which currently makes a positive contribution to the open setting of Canons Park (by virtue of the absence of development). The proposed development, by reason of its siting, height, bulk and the limited buffer/setting space provided (for planting to screen the development), would be readily visible from within Canons Park and therefore have an impact on the setting.
- 6.5.17 In terms of the panoramic views, from viewpoints 2 and 3, the height and massing of the scheme would draw the eye and be the primary backdrop for the panoramic views looking eastwards from the Park entrance along Whitchurch Lane. However, the views themselves would not be unobstructed, and it is

acknowledged that high fencing, hedges and the existing buildings on the eastern side of Donnefield Avenue would provide a degree of buffer. Consideration must also be given to the extant planning permission to provide an additional floor to nos. 1-21 Canons Park Close, which would serve to provide a greater degree of screening. The proposed development would not obstruct or undermine the prevailing visual experience from the long-range view from the Whitchurch Lane entrance looking northwards and therefore the landscaped setting (and significance) would continue to be appreciated in its current form when looking at the expansive axial route.

- 6.5.18 Unquestionably, the relative size and appearance of the proposed development would make it more pronounced in views towards the application site from the central amenity area within the Park and adjacent to the Donnefield Avenue entrance. While it is expected that some views might be partially buffered by mature trees, the effectiveness of this would be reduced when the trees are not in leaf, and even so, there would still be many sightlines and viewpoints where this the natural buffer would not exist (view 5 being a case in point). The extent of change to the setting would be from the height and massing of the development and the absence of setting space to provide an appropriate buffer thereby making the proposed development visually prominent.
- 6.5.19 The significance attributed to the sense of isolation and tranquillity experienced within the Park would be impaired by reason of the provision of a protruding balcony and glazing with patio door Juliette balconies on the north facing elevation. This would exacerbate the identified impacts on the significance of the Park. For this reason, the applicant has provided revised drawings which have removed the protruding and patio door Juliette balconies on the northern elevation. While the retained windows would still provide a degree of impact, by reason of potential light spill and the expected views/outlook from occupiers of domestic dwellings, the degree of visual intrusion as a result of actual overlooking on balconies would be substantially reduced.
- 6.5.20 View 8 confirms that the proposed development would not be visible from the George V Memorial Garden or from the northern portion of the park, where the group of individually listed heritage assets are located. The site is too far distanced from this aspect and is screened by intervening landscape and tree coverage. A number of key views within this area of the Park, which were identified within the Conservation Area Appraisal Strategy, would therefore not be impacted. The tranquillity and seclusion of the memorial garden will therefore be unaffected by the proposed development.
- 6.5.21 The proposed development would be sited approximately 360m away from the Grade I St Lawrence Church. Again, given the notable separation distance and the extensive mature tree covering which delineates the boundary of the Church, it is considered that the proposed development would have a very limited impact in views from the Church towards the application site. Building A would also be sited to the north of the Church, any potential overlooking at higher levels would be limited to oblique angles. For these reasons, it is considered that the effect of

the proposal on the setting of the Grade I St Lawrence Church would be negligible.

- 6.5.22 Taking these points all into consideration, while it is acknowledged that many key features contributing to the significance of the Park and CA would largely remain, including verdant views from key viewpoints and individually listed heritage assets, the severity of change as a result of the proposed on the setting of the heritage assets (particularly from the open parkland and the zones around the Donnefield Avenue entrance) would be apparent. Overall, it is considered that the proposal would have a harmful effect on the setting setting of the Grade II Canons Park and the Canons Park Estate Conservation Area. The harm is considered to be 'less than substantial' for the purposes of the National Planning Policy Framework.
- 6.5.23 Great weight should be attached to the conservation of the heritage assets, in line with Paragraph 193 of the NPPF. Paragraph 196 of the NPPF states that where a development proposal will lead to 'less than substantial harm' to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. This applies to the effect of proposal both on the significance of the heritage assets, and on the ability to appreciate that significance.
- 6.5.24 It is important at this point to address whether similar benefits could be brought forward on site which avoids harm to the designated heritage assets. The internal and external heritage consultee responses detailed that a reduction in height and the provision of setting space to enable a natural planted buffer to be provided would reduce the level of harm identified. Given that the identified harm relates to the height, scale and siting of the proposed buildings, it would follow that the suggested interventions (i.e reduction in height and more setting space) would successfully serve to reduce the level of harm. While this might be the expected outcome, the key consideration is whether the proposal would still be able to deliver the same public benefits through an alternative scheme.
- 6.5.25 As the proposed development would deliver 100% affordable housing, the application did not require the submission of viability assessment. However, as part of the Affordable Housing Supplementary note, a financial note on the proposed development was provided. This details that the scheme already has constrained viability and the proposed offer is already above the maximum reasonable. It is therefore extremely likely that any reduction in massing would make the scheme unviable. Furthermore, any reductions would be bound to reduce the ability to achieve a comparable volume of accommodation, and may impact upon the number family sized London Affordable Rent Units that could be provided, which are the priority need within the Borough. Given the constraints of the site, it is not likely that re-balancing the massing between the blocks would address the harms identified. For these reasons, in the absence of any evidenced reasonable or viable alternatives that could effectively reduce the harm but provide the same or similar benefits, the weight afforded to the potential of an alternative scheme delivering the same public benefits is limited.

- 6.5.26 The Council have identified that the Grade II Listed 18th Century Memorial Garden Walls are in need of repair. In line with the Council's Planning Obligations SPD, officers therefore consider that a financial contribution towards the repair of this heritage asset which lies within the Grade II Listed Canons Park would improve the character and appearance of the Registered Park and Garden, and Canons Park Estate Conservation Area. Subject to securing the financial contribution through a section 106 agreement, officers consider this would constitute a public benefit.
- 6.5.27 Having established the public benefits of the scheme (appraised in detail within the relevant subsections of this report and concisely summarised within the planning balance subsection), it is necessary to return to the balance triggered by NPPF Paragraph 196. It is considered that moderate weight should be given to the harm to the significance of Canons Park grade II Listed Park and Garden, and the Canons Park Conservation Area on account of development within its setting. Weighed against the public benefits of the scheme, officers consider that the NPPF Paragraph 196 balance should weigh in favour of the proposals. This is an important material consideration.

6.6 Residential Quality, Amenity and Accessibility

6.6.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2016): 3.5, 3.6, 3.8, 7.2, 7.6
- The Publication London Plan (2020): D5, D6, D7,
- Harrow Core Strategy (2012): CS1K
- Harrow Development Management Policies (2013): DM1, DM27, DM28
- Mayor of London Housing Supplementary Planning Guidance (2016)
- Mayor of London Achieving An Inclusive Environment Supplementary Planning Guidance (2014)

Residential Quality of Future Development

Entrances and Shared Circulation

- 6.6.2 The Mayor's Housing SPG calls for entrances to be visible from the public realm and clearly defined. The residential entrances to the buildings would face the highway. They would be visible from and would help to activate the new public realm within the proposed development.
- 6.6.3 The entrance lobbies to the proposed residential flats would be generously proportioned and in accordance with the Mayors Housing SPG, each building would be served by at least one lift and there would be no more than eight residential units per floor serving the core. The SPG also encourages communal corridors to receive natural light and ventilation where possible. Building A would provide a gallery access to the proposed residential units and thereby allow for the access corridor to be served by natural light and ventilation. The configurations for buildings B and C, however, do not allow for windows to serve the corridors. However, it is noted that the corridors are not excessively long and

are served by a generously sized lobby for each floor. Whilst clearly not ideal, this is not considered to be unacceptable.

Internal Space Standards

- 6.6.4 The minimum space standards are set out at Table 3.3 of the London Plan (2016) and are reproduced within the Mayor's Housing SPG. The submitted Design and Access Statement details the proposed unit typologies which would be provided within building A and buildings B and C. All of the flats within the proposed development would meet or exceed the London Plan minimum space standards. The development would also achieve the minimum floor to ceiling height of 2.5 metres as required by the Housing SPG. The submitted drawings show that the proposed layouts would make reasonable provision for the accommodation of furniture and flexibility in the arrangement of bedroom furniture.

Daylight, Sunlight and Aspect

- 6.6.5 The Mayor's Housing SPG seeks to avoid single aspect dwellings where; the dwelling is north facing (defined as being within 45 degrees of north); the dwelling would be exposed to harmful levels of external noise; or the dwelling would contain three or more bedrooms. The definition of a dual aspect dwelling is one with openable windows on two external walls, which may be opposite (i.e. front & back) or around a corner (i.e. front and side) and the SPG calls for developments to maximise the provision of dual aspect dwellings.
- 6.6.6 Building A would not feature any single aspect windows as a gallery access is proposed to the rear, thereby allowing the residential units in the middle of the building to have windows on the west facing elevation. Buildings B and C would each contain 23 units which are single aspect. While the provision of single aspect flats is regrettable, the respective units would all be one bed flats and would not be north facing. Every effort has been made in the design and layout of the proposal to maximise the number of dual aspect flats.
- 6.6.7 An Internal Daylight, Sunlight and Overshadowing Report produced by GIA has been submitted with the application. The report details that 314 of the 367 rooms meet or exceed the levels of Average Daylight Factor (ADF) recommended by the BRE. Of the 53 rooms that fall short, 30 are kitchens, 15 are main living areas and 8 are bedrooms. However, the report identifies that for most of the open-plan units, the units have been designed so that the kitchens are located within the rear, thereby giving priority for good levels of daylight within the living area to the front of the room. Overall, the scheme would deliver well daylit bedrooms, with 95% meeting or exceeding the ADF level suggested. Those bedrooms that just fall short of the recommendation, only do so marginally. Further to good levels of daylight ingress, 90% of the rooms within the development would meet the recommended levels of No-Sky Line (NSL).

- 6.6.8 Turning to the quality of sunlight for the proposed flats, the submitted report assesses all living room windows for Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH). The results show that 84% of the tested living rooms see good levels of both APSH and WPSH. Where the living rooms fall short of the guidance, this is primarily as they are set behind or beneath balconies. The report notes that this is an expected consequence of the provision of balconies as they intercept the sun's rays before they can reach the fenestration.
- 6.6.9 The Council engaged the services of a specialist consultant to provide independent appraisal of the Internal Daylight, Sunlight and Overshadowing Report. The consultant verified that where the rooms do not meet the guidelines for daylight and sunlight, they are generally located behind or beneath recessed balconies or covered walkways (i.e the gallery access to Building A) which hinder the access of daylight. Daylight to rooms that are on the north or south elevations of the buildings is also restricted when 2 buildings face each other. The consultant has advised that overall, the daylight and sunlight provision to the new units is considered good for a development of this size. Where there are transgressions, these should be balanced with the inherent features of the proposed development such as private amenity in the form of balconies, which would be well sunlit themselves.

Privacy

- 6.6.10 The flank elevations of the proposed buildings would feature primary habitable room windows serving bedrooms and secondary windows serving the communal living areas. The separation distance between the facing flank elevations of buildings A and B would be approximately 13m while the distance afforded between the flank elevations of building B and C would be 9m.
- 6.6.11 Given the density of the subject proposal, which is consistent with the need to make effective use of this brownfield and accessible site, it is considered that the overlooking relationship would not be so severe as to create unacceptable privacy conditions for the future occupiers of the corner flats. Moreover, effort has been made to provide dual-aspect living rooms, which would therefore result in the flank wall windows serving as a secondary source of light and outlook, as opposed to the primary openings. This would serve to further reduce any perceived or actual overlooking relationship between habitable rooms. The relationship between the buildings is therefore considered to be commensurate with the intended character of the higher density proposal and the likely expectations of future occupiers of the development.
- 6.6.12 The station platform for Canons Park Underground Station would be sited approximately 15m to the west of Building A and by virtue of its position on the railway embankment, would be approximately level with the proposed first-floor units. However, as detailed elsewhere in the report, the railway embankment is a designated Site of Importance for Nature Conservation. Therefore, the existing extensive tree and vegetation cover within the adjacent railway embankment would be safeguarded, thereby maintaining the existing natural buffer and

screening in views towards the application site from the railway platform. On this basis, it is considered that the proposal would not have a detrimental impact on the privacy of the future occupiers.

Noise and Vibration

- 6.6.13 The application is supported by a Noise and Vibration Assessment produced by ACCON. A noise measurement survey was carried out across the site in order to determine the extent to which the proposed development site is currently affected by noise. The primary sources of noise identified were from train movements, activities at the station (e.g such as announcements and train door movements) and from road traffic.
- 6.6.14 In terms of design, building A, the closest building to Canons Park Station, would have a gallery access at the rear. With the exception of unit typology A-01, all the other units would not have windows serving primary habitable rooms (that are single aspect) on the west facing elevation. Although the west facing elevation of buildings B and C would feature balconies, these have been recessed which would minimise noise exposure, and it is intended to provide sound absorptive material in the balcony soffits to minimise reflections of noise and balustrading to screen noise.
- 6.6.15 The submitted Noise and Vibration Assessment details the daytime internal noise levels for most of the proposed flats should be considered to be reasonable when windows are open for ventilation and that appropriate noise levels could be provided for most of the units with the window shut. The Assessment therefore suggests alternative means of ventilation for habitable rooms within windows in the north, west and south facades of the buildings to ensure that windows can be kept closed for the majority of time to ensure target internal noise levels are achieved. With open windows, the noises associated with the station activities are also likely to be intrusive to adjacent residents. For the units within buildings B and C, only unit type BC-06 would be west facing single aspect. As such, these one-bed, two person units would have their sole outlook (and ventilation) from window openings in the west facing elevation. Consequently, these units would not benefit from natural ventilation from other building aspects. Officers acknowledge that these single-aspect units would be particularly vulnerable to increased noise impacts and consider it necessary to include a condition requiring a more detailed assessment including detailed noise mitigation/sound insulation and ventilation measures for all the proposed units.
- 6.6.16 In relation to vibration measurements, the Assessment notes that the proposed development would incorporate building foundations which will resist motion from ground-borne vibration. Following the vibration assessments undertaken, the submitted report considers that no vibration mitigation measures would be required for the proposed development.

6.6.17 The application was referred to the Council's Environmental Health officer who has acknowledged the recommendations within the Assessment for a sound reduction of 24dB(A) to achieve the target internal noise levels with windows closed. Subject to conditions requiring a detailed sound insulation scheme to provide noise mitigation measures, the proposal would be acceptable in this regard.

Private and Communal Amenity Space

6.6.18 For private amenity space, the Mayor's Housing SPG requires a minimum of 5m² per 1-2 person dwelling and an extra 1m² for each additional occupant. This is also reflected in Policy D6 of the Publication London Plan (2020). All of the proposed upper floor flats would be served by a balcony and would meet or exceed the minimum private amenity space requirements. The Pedestrian Level Wind Microclimate Assessment produced by RWDI details that the majority of balcony locations would be suitable for the intended use during the summer season. However, the report considers that the protruding balconies on the south-east and north-east of building A, the north-west and south-west as well as the top south-east corner balcony of building A, and the north-west balconies of building C would be windier than desired. However, the report notes that the results do not take into account the solid balustrade which is proposed. As such, the report notes that the inclusion of this balustrade would be expected to provide sufficient shelter to western balconies such that conditions would be suitable for amenity use, but east facing balconies may still result in less than the desired sitting or standing wind conditions. Officers consider that this could be mitigated through detailed conditions.

6.6.19 In addition to the private balconies, occupiers of the flats would also have access to two communal outdoor space. The 'community garden' would be located between buildings A and B while the 'pocket garden' would be provided to the north of building C, adjacent to Canons Park. These communal areas would supplement the private balconies and would provide a welcome additional component to the amenity afforded to future occupiers of the development.

6.6.20 The proposed communal gardens would be overlooked by the buildings that they serve (by virtue of the windows within the flank elevations) and would be at surface level, thereby being accessible to the future users. The Mayors Housing SPG also states that communal areas should be designed to take advantage of direct sunlight. In this regard the overshadowing effects of the development upon the proposed communal amenity spaces has been examined in the submitted Overshadowing Report produced by GIA. BRE guidance recommends the amenity space to receive more than two hours sunlight on 21st March (i.e the Spring Equinox). The submitted assessment finds that 82% of the 'community garden' would experience more than 2 hours of direct sunlight, while 91% of the 'pocket park' would achieve direct sunlight for more than 2 hours. Furthermore, the Pedestrian Level Wind Microclimate Assessment produced by RWDI details that the proposed communal amenity spaces would still be suitable for sitting with isolated areas of strolling and standing conditions during the windiest season.

Taking this into account, and the close proximity of Canons Park, it is considered that the quantity and quality of communal space provided would be acceptable.

Children's Play space

- 6.6.21 The relevant policies require an on-site provision of facilities where a development would result in a net increase in child yield. Applying the GLA Population Yield Calculator, the proposed development is expected to yield a total of 50 under 16's comprising 25 x 0-4 year olds, 18 x 5-10 year olds and 7 x 11-15 year olds. The Council's Planning Obligations SPD, informed by Harrow's PPG 17 Study, sets a quantitative standard of 4 square metres play space per child. Based on the indicative child yield from the development, this would equate to a minimum requirement of 200m² of play space.
- 6.6.22 The submitted Landscape and Public Realm Strategy by Townshend Landscape Architects provides details of the proposed play strategy. The report identifies that the proposed development would provide 274m² of play provision that would be located within the two communal shared amenity spaces (i.e 'the community park' and 'pocket park'). While there would be scope to provide some children's play space within the communal shared amenity spaces, the submitted Landscape and Public Realm Strategy also notes that the communal amenity spaces are intended to be multifunctional, serving as places to encourage social interaction (through seating) and visual amenity through generous planting. Furthermore, the western end of the proposed shared amenity spaces would be occupied by cycle stores.
- 6.6.23 Given the multipurpose use of the communal amenity spaces, it is unrealistic that the proposed development can be considered to provide the minimum quantum of designated children's play space as required by the relevant policies. The supporting text to policy S4 of the Publication London Plan (2020) details that formal play provision should be well-designed, accessible, inclusive and stimulating. It is also acknowledged that integrating natural environments into play provision is encouraged, while there should be an appropriate provision for different age groups. Off-site provision, including the creation of new facilities or improvements to existing provision, secured by an appropriate financial contribution, may be acceptable where it can be demonstrated that it addresses the needs of the development whilst continuing to meet the needs of existing residents.
- 6.6.24 The designated children's play area within Canons Park is sited approximately 100m to the north of Building C and would therefore be readily accessible from the application site, particularly for older children. In order to quantify the exact provision of play space that would be provided and the necessary form of provision, it is considered prudent to attach a planning condition requiring the submission of a detailed play strategy. A contribution to off-site provision for the resulting shortfall will be secured through a planning obligation.

Accessibility

- 6.6.25 To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, the London Plan required at least 10% of dwellings to meet Building Regulation requirement M4(3) 'Wheelchair user dwellings'. All other dwellings (i.e the remaining 90%) would need to meet Building Regulations requirement M4(2) 'accessible and adaptable dwellings'.
- 6.6.26 The submitted applications documents confirm that 12 of the proposed units would be in accordance with M4(3) 'Wheelchair user dwellings' and the remaining units would comply with M4(2) 'accessible and adaptable dwellings'. A condition is recommended requiring the internal layout of the buildings and its external spaces to meet these standards. Subject to this condition, officers consider that the proposed development would acceptable in this regard.

Residential Amenities of adjoining occupiers

- 6.6.27 The application site is located within in a suburban area and as expected, many of the adjacent land uses are residential. The building heights are generally uniform, varying between two and three storeys. The nearest residential properties are as follows:
- Wyel Lodge: Two storey residential dwellinghouse abutting the application site to the north. The north elevation of block C would be sited approximately 9m away from the shared boundary and 17m from the respective flank elevation of that dwellinghouse
 - The End House: Two storey residential dwellinghouse on the north-eastern side of Donnefield Avenue. The front elevation block C would be approximately 20m away from the front elevation of that dwellinghouse.
 - 1-20 and 21-40 Canons Park Close: two and three storey detached block comprising of 20 flats (per block) located opposite the application site. The front projecting elements of the blocks would be located approximately 21m away from the respective front elevations of the buildings, while the recessed central element would be sited approximately 32m away from the respective front elevations.
 - Nos. 2 – 40 (even) Cheyneys Avenue and 46 and 48 Watersfield Way: two-storey residential dwellinghouses located on the western side of the railway embankment. The rear gardens of those dwellinghouses would be sited approximately 45m away from the west facing elevation of the proposed buildings.

Visual Impact, Outlook and Privacy

- 6.6.28 Undoubtedly, the proposed development would represent a distinctive new addition to the area. It would, by reason of its height, be visible to occupiers of premises over a wide area. However, the impacts would be most pronounced for the occupiers of adjoining sites. The existing surface car park provides an unobstructed view in the outlook of the residential units and dwellinghouses that

surround the application site. In this context, the introduction of development on the site (especially at the scale proposed) would result in a significant change in the outlook and associated amenity benefits currently experienced by the neighbouring residential occupiers. However, being able to see a building is not of itself indicative of visual harm, and it is therefore necessary to consider in greater detail the specific relationships that would result between the proposed buildings and structures and the nearest affected neighbouring properties.

- 6.6.29 The End House and flats of nos. 1-20 & 21-40 Canons Park Close are orientated directly towards the application site. As noted above, the front elevations of the proposed buildings would maintain a separation distance between 20m – 32m from the respective front elevations of those neighbouring properties. Evidently, at seven storeys, the proposed buildings would be large, and would appear as such from the forecourts and front elevations of the respective residential properties. While the view would be softened by the existing shrubs and trees which delineate the front boundaries of those properties, given that a number of trees and shrubs are deciduous, this level of natural screening would not be provided all year round. However, the gaps between the buildings and detailed articulation of the front elevations would positively mitigate the perception of bulk and massing, albeit in a modest way.
- 6.6.30 In terms of privacy and overlooking impacts, it is noted that the Mayor's SPG refers to separation distances of 18-21 metres between facing elevations with habitable rooms as being 'useful yardsticks' for visual privacy. The separation distances would therefore be sufficient to mitigate against any intervisibility between the residential buildings. Whilst recognising that the adjacent occupiers would experience a visual change, taken together with the separation distances described above and having regard to the need to make effective use of this allocated site, officers consider that the resulting visual and privacy impacts would be not be unacceptable.
- 6.6.31 Turning to the impacts on Wyel Lodge, that adjoining property is located to the north of building C and does not have any original windows within the flank elevation. Therefore, the outlook currently experienced by occupiers within that property would only be affected in limited oblique views from the rear elevation towards the application site. In terms of privacy, it is acknowledged that the habitable room windows within the north elevation of building C would be orientated towards the rear garden of Wyel Lodge and could therefore give rise to a perception or actual overlooking of that private amenity space. However, having regard to the need to make effective use of this allocated site in addition to other material considerations, officers consider that on balance, the identified harm to the privacy amenities of the occupiers of Wyel Lodge would be outweighed by other material planning considerations detailed in the report.
- 6.6.32 In terms the adjacent residential dwellinghouses along Cheyney's Avenue and Watersfield Way, the rear gardens of those properties would be sited 45m away from the west facing elevations of the proposed buildings. While the upper storeys of the proposed buildings would be visible from the rear elevations of those respective properties, the intervening railway embankment and siting of

trees on either side (within the SINC), would serve to provide an effective degree of screening. Given the separation distances afforded, it is considered that the proposal would not have a detrimental impact on the visual or privacy amenities of the adjacent occupiers along Cheyneys Avenue and Watersfield Way.

- 6.6.33 The proposed development would, of course, also be visible to residential occupiers and from commercial premises within the wider locality. Given the conclusions about visual impact in relation to residential properties much closer to the application site than those within the wider area, it follows that the visual impact upon occupiers of all other affected properties can be accepted.

Daylight and Sunlight Impacts

- 6.6.34 A Daylight and Sunlight report produced by GIA has been submitted with the application. The assessment uses widely-recognised methodology to assess the proposal's impact upon neighbouring property against British Research Establishment (BRE) guidelines. The report considers the three BRE Guidelines methodologies for daylight assessment of neighbouring properties; the Vertical Sky Component (VSC); the No Sky Line (NSL); and the Average Daylight Factor (ADF). It is necessary for both the VSC and NSL to be met for any particular room in order to satisfy the BRE guidelines. For the sunlight assessment, the report uses the Annual Probable Sunlight Hours (APSH) methodology. In accordance with BRE guidelines, only the main rooms (living rooms, dining rooms and kitchens) in neighbouring properties have been considered. Staircases, hallways, bathrooms and toilets have not been considered. The report also provides precedent examples of recent permissions that have been granted by the Council, and the respective daylight and sunlight impacts/relationships of those schemes.
- 6.6.35 The Council engaged the services of a specialist consultant to provide independent appraisal of the applicant's daylight and sunlight assessment. The consultant has endorsed the methodologies employed and adopted a significance criteria to summarise the impacts of the development on the neighbouring residential properties. This applies to VSC where VSC is reduced to less than 27%, to NSL, and to APSH where the APSH is reduced to less than 25% and/or less than 5% in the winter months.

- Reduction of 0% of 20%: negligible impact
- Reduction of 20% to 30%: minor adverse impact
- Reduction of 30% to 40%: moderate adverse impact
- Reduction of more than 40%: major adverse impact

This criteria is considered by reference to the overall impact on an individual dwelling or block of dwellings rather than necessarily related to one window alone. The independent consultant has provided specific comments where necessary in relation to the assessment findings.

1-20 Canons Park Close

- 6.6.36 The Submitted Daylight and Sunlight report recognises that as the site opposite the building is vacant, the respective residential units experience a high level of daylight and sunlight amenity, which is far in excess of the targets for a suburban area. In terms of daylight impacts (VSL and NSL), the report considers that 21 out of 32 rooms would experience some BRE transgressions (12 which are believed to be living rooms and 9 estimated to be bedrooms). Where there are breaches in VSC, the vast majority of windows in the property above will experience retained values over 20%. The daylight and sunlight report emphasises that the undeveloped nature of the application site and the high existing VSC values mean that any meaningful massing on the site is likely to cause VSC alterations greater than 20%. In terms of sunlight, 3 out of the 32 rooms assessed would not meet the recommended guidelines for ASPH. One living room would experience an alteration in annual sunlight of 27.4% and a further bedroom would experience an alteration of 22.2% (which just breaches the guideline figure of 20%). The third room would only breach the guidelines for winter sunlight, retaining a winter ASPH of 4% (just below the guidance figure of 5%). It is also noted that the respective flats are dual aspect, so will continue to retain high daylight amenity to the rooms which do not face the application site.
- 6.6.37 The Council's Independent Consultant has reviewed the report and considers that the overall impact to 1-20 Canons Park Close to be minor adverse. In terms of VSC, 8 rooms would experience a minor adverse impact and 10 rooms would have a moderate adverse impact. However, the Independent Consultant acknowledged that the property generally benefits from high VSC levels in the existing condition. Therefore, whilst the reduction in the former value results in adverse impacts, the actual retained values are good (with the exception of 3 room), mostly retaining VSC values of 20%-26.9%. For NSL, of the 8 rooms that fall below the recommended guidelines, each room would retain direct sky to between 52.6% and 74.3% of their area. The sunlight impacts to the flats are considered to be negligible.

21-40 Canons Park Close

- 6.6.38 The daylight and sunlight impacts on nos. 21-40 Canons Park Close would be more acute. Only 2 out of the 32 rooms would achieve BRE compliance for daylight (VSC and NSL). In terms of NSL, 11 out of the 32 rooms would not meet the recommended guidelines. In terms of sunlight, 8 rooms would experience BRE breaches. The submitted daylight and sunlight report acknowledged the transgressions, but again reiterates the high existing VSC values experienced by the occupiers as a result of the absence of development on the application site. Therefore, any meaningful massing on the site, especially for the delivery of the quantum of affordable housing proposed, is likely to cause VSC alterations greater than 20%. The report also considers that each of the flats is dual-aspect. Therefore, while there are isolated instances of low retained daylight values, each flat contains rooms that do not face the site and will continue to retain a high daylight amenity.

- 6.6.39 The Council's Independent Consultant has advised that of the 30 rooms which fall below the daylight guidelines, 10 would experience a minor adverse impact, 17 a moderate adverse impact and 3 a major adverse impact. However, as with 1-20 Canons Park Close, the property benefits from high VSC levels in the existing condition. Therefore, whilst the reduction in former values results in adverse impacts, the retained values are good (24 rooms would achieve retained VSC of 21%-26.9% and 6 rooms between 16.1%-18.9%). For NSL, the 11 rooms would fall below the recommended guidelines, but would still retain direct sky to between 49.1% and 79.2% of their area. In terms of sunlight impacts, 5 rooms would fall short of the annual winter and sun target values, while 3 rooms would fall short of the winter sun target. The Council's Independent consultant considers that the daylight and sunlight impacts to 21-40 Canons Park Close would be moderate adverse.
- 6.6.40 A consultation response on behalf of the freeholder of the site raised concerns at the potential for future development on 21-40 Canons Park Close, by reason of the windows and single aspect units facing the application site. However, given the separation distances involved, officers consider that the provision of single aspect units fronting Donnefield Avenue would not in themselves prejudice any future development of 21-40 Canons Park Close. In any case, each application would need to be assessed on its own merit.

The End House

- 6.6.41 The submitted Daylight and Sunlight report considers that all five rooms relevant for assessment would experience BRE breaches in relation to daylight, while two rooms would experience alterations in sunlight beyond the BRE guidelines. The report considers that the breaches are in part due to the depth of the respective rooms and the existing features of the property, whereby the ground floor window in the northern part of the front elevation has an existing overhang, and daylight to that room is already impacted by the existing projections adjacent to it. The report summarises the impacts by acknowledging the changes in daylight beyond BRE guidelines, but considers that this would be inevitable for a development providing such a level of housing on a site that is currently vacant (of buildings). In consideration of the retained daylight levels and in the context of the policies and precedents detailed, the report considers that the daylight and sunlight impacts to the End House would not be detrimental.
- 6.6.42 The Council's Independent Consultant, using the significance criteria, had identified that 2 of the 4 rooms would experience a minor adverse impact, a reception room would experience a moderate adverse impact, and a kitchen/living/dining room would experience a major adverse impact. However, it is acknowledged that daylight for window which experiences the major adverse impact is already vulnerable to daylight impacts given the recess and projecting wings either side, both of which reduce access to daylight. For the two rooms that would not meet the NSL value, the rooms are deep and benefit from high levels of direct sky over the existing underdevelopment site. Therefore, any meaningful massing on the site is likely to cause transgressions. The Council's Independent

Consultant considers the overall impact to this property to be moderate adverse in relation to daylight and negligible in relation to sunlight.

- 6.6.43 A representation was received by the occupiers of the End House which raised an objection to the proposal and included an independent review of the submitted Daylight and Sunlight report by an expert commissioned by the occupiers. The expert review appreciates that the room layouts were not fully understood in the Daylight and Sunlight report. Even so, the expert review notes that the consideration of the resulting impacts as an 'urban setting' is not reflective of the location and that the rooms would still nonetheless experience material transgressions. Furthermore, while it is acknowledged that site circumstances provide a low existing value for one of the ground floor windows, this does not itself justify reducing the VSC levels by more than half. The expert review considers that the building will form a dominant obstruction to light and will have a very real and material impact.
- 6.6.44 Having had the opportunity to review the comments provided with the neighbour representation, the Council's Independent Consultant has acknowledged the validity of some of the points raised in relation to VSC. In particular, the area may be classed as more suburban, but with the exception of 3 windows, all would retain VSCs above 20%. The 3 that are lower than this would experience VSCs of 6.2%, 18.1% and 19.6%. While the lowest value is not really typical of this environment, the other figures are not necessarily poor. The Council's Independent Consultant has acknowledged that the proposal would have a moderate adverse impact in daylight terms.

Wyel Lodge

- 6.6.45 The submitted Daylight and Sunlight report did not consider the impacts to this adjoining dwellinghouse. However, further information was provided by GIA during the course of the application which assessed the impacts. As the property does not feature any windows directly facing the application site and as the west facing windows will not experience a view to the proposal, there would be no alteration in daylight to the respective rooms. In terms of overshadowing, the garden would receive more than two hours direct sunlight (during the spring equinox), and would therefore be compliant with the BRE guidelines. Officers are satisfied with the conclusions of the in this regard.

46 Watersfield Way

- 6.6.46 When considering daylight distribution, one ground floor window would experience an alteration of 22% in relation to NSL, which is marginally greater than the recommended figure. Given the small isolated breach of BRE guidelines, and in the context of relevant policy and precedents provided, the submitted assessment considers that the daylight and sunlight impacts would not be detriments. The Council's Independent Consultant has concluded that overall, the impact to this property is considered negligible.

Nos. 2 – 40 (even) Cheyneys Avenue and 46 Watersfield Way

- 6.6.47 The submitted Daylight and Sunlight report analysis demonstrates that these properties would remain BRE compliant in relation to VSC, NSL and ASPH and therefore no further detailed consideration is necessary. The Council's Independent Consultant has concurred with this conclusion.

Overshadowing Impact

- 6.6.48 An overshadowing assessment was undertaken to determine whether the amenity areas surrounding the Site at the following properties achieve adequate levels of sunlight (two or more hours) on the 21st March. Based on the technical analysis, it was found that all amenity areas would achieve BRE compliance in relation to the sun hours on ground assessment. The Council's Independent Consultant confirms that the impact in overshadowing is therefore negligible.

Overall impact

- 6.6.49 It is clear from the submitted assessment and the review undertaken by the Council's Independent Consultant, that a number of adjoining properties would see transgressions in the level of daylight and sunlight beyond the BRE guidelines. Officers acknowledge that some rooms would be particularly impacted and would see material changes in the level of daylight and sunlight currently experienced. However, these impacts must be considered against other material considerations. In relation to the site context, it is recognised that the adjacent residential properties currently experience high levels of daylight and sunlight as a result of the absence of built massing within the application site. This accounts for greater reductions in former values as a result of the development, but as affirmed by the Council's Independent Consultant, most of the retained values to rooms are good. While some of the rooms facing the application site may experience notable changes to daylight and sunlight currently experienced, some consideration is also given to the dual-aspect layout of the adjacent residential units. The residential units would therefore continue to retain high daylight amenity to the rooms which do not face the application site.
- 6.6.50 The National Planning Policy (2019) and the relevant policies of the development plan set out the need to make effective use of land in meeting the need for homes. This is particularly significant given the allocation of the application site, the focus on surface car parks and sustainable locations in the optimisation of housing delivery, and the 100% affordable housing output of the proposal (all appraised in detail elsewhere within this report). While a reduction in massing would, in all likelihood, have the consequential effect of reducing the degree of impacts identified, it is not known whether these alternatives would deliver the same quantum of outputs that are to be delivered as part of the subject proposal. Taking the conclusions of the specialist consultant, the extent and degree of daylight and sunlight losses that would occur, the need to balance the efficient use of this allocated site, and the other considerations detailed within the report, it is concluded that the proposal would maintain a high standard of amenity for neighbouring residential occupiers. The limited losses to sunlight and daylight would be outweighed by the other material considerations.

Proposed use

- 6.6.51 It is acknowledged that some public consultation responses referred to the noise and disturbances that would be associated with the proposed development. Although the proposal would consist of an increased density of housing beyond that which is currently provided within Donnefield Avenue, the residential uses (and resultant noise generation associated with such uses) are considered to be wholly appropriate to the area. As the proposed development would be car free and would reduce the amount of existing commuter car parking, it is likely that the acoustic environment would be improved in this respect. The noise and disturbances during the construction phase would be for a limited period, and the impacts would be mitigated through detailed construction management plans. Officers therefore consider that the proposal would not have a detrimental impact on the residential amenities of adjoining occupiers in this regard.

6.7 Transport and Parking

- 6.7.1 The relevant policies are:
- National Planning Policy Framework (2019)
 - The London Plan (2016): 6.1, 6.3, 6.9, 6.10, 6.11, 6.13
 - The Publication London Plan (2020): T1, T2, T3, T4, T5, T6, T6.1, T7
 - Harrow Core Strategy (2012): CS1R
 - Harrow Development Management Policies (2013): DM42, DM43, DM44, DM45
- 6.7.2 Donnefield Avenue is a local cul-de-sac which has a single entry point off Whitchurch Lane (B461). To the west of the site the B461 merges onto the A5, which is an important connector that links directly into Central London. The application site is occupied by a 162 space car park which is situated approximately 100m north of the Canons Park London Underground Station. The site is highly accessible for pedestrians, with footways provided on all streets. The B461 is also highlighted as a route signed or marked for use by cyclists on mixture of quiet or busier roads. It features a cycle lane incorporated in the western side of the footway, providing access on a north-south trajectory to North Harrow.
- 6.7.3 The application site is site is in close proximity to Canons Park Underground station which provides Jubilee Line services to Central London and Stratford in the south east and Stanmore to the North. Key eastbound destinations include Bond Street, Westminster, Waterloo, London Bridge and Canary Wharf. Edgware London Underground station, served by the Northern Line, is located 1.5km east of the proposed development site. Adjacent to Canons Park Underground Station along Whitchurch Lane are two bus stops. These are served by three bus routes; the 79 (Alperton-Edgware), 340 (Harrow-Edgware) and 186 (Brent Cross-Northwick Park Hospital). The application site is in a PTAL 3 location, representing a moderate level of public transport accessibility.

- 6.7.4 Donnefield Avenue and the surrounding highway network are subject to a Controlled Parking Zone (CPZ). Zone DA along Donnefield Avenue (8am-6.30pm Monday to Saturday) features 33 pay and display bays and one blue-badge permit bay. Whitchurch Lane has a single yellow line restriction (8am-6.30pm Monday to Friday) and provides 69 on-street parking bays. CPZ CS to the west of Canons Park Station features 41 pay and display bays and one blue badge bay (operating 8am-6.30pm Monday to Saturday).
- 6.7.5 The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also contribute to wider sustainability and health objectives. It emphasises the importance of reducing the need to travel and encouraging public transport provision to secure new sustainable patterns of transport use. The London Plan and local plan policies recognise the need for impacts on the transport capacity and network to be fully assessed, but also seek to encourage and facilitate a modal shift to more sustainable methods of transport such as walking, cycling and public transport.
- 6.7.6 The NPPF requires proposals that would generate significant amounts of movement to be supported by a Transport Assessment and to provide a Travel Plan. A Transport Assessment (TA) and Framework Travel Plan produced by WSP, have been submitted in support of the planning application. Further Transport Addendum notes were provided during the course of the planning application in response to comments from the Local Highways Authority.

Canons Park Station Car Park

- 6.7.7 The proposal seeks to reduce the capacity of the existing car park from 162 car parking spaces to 60 (equating to a loss of 63% existing capacity). Six of the parking bays will be dedicated to blue badge holders only and overall 6% will feature electric vehicle charging points. The car park is well utilised, and the submitted details show full occupancy on weekdays for the majority of the traditional working day. This point was also emphasised in several public consultation responses.
- 6.7.8 The Transport Assessment includes a study carried out by TfL to profile the car park users. The study showed that 33% of the respondents live within 2km of the station, 45% of the respondents live within 5km of the station and 22% of the respondents come from further away and drive past other rail/underground stations to Canons Park. In terms of alternative modes of travel, 41% of the respondents were willing to switch to a form of sustainable travel to the station, and 22% of users could use alternative routes. The survey therefore deduced that a total of 63% of car park users could travel by alternative routes or switch to sustainable methods of transport to reach the station (walking, cycling, bus).
- 6.7.9 The Council's Highways Authority have acknowledged that the study demonstrates there is a significant number of people currently driving to the station that could potentially travel using a sustainable alternative mode, such as walking, cycling or the bus. In order to facilitate more active modes of travel, such

as cycling, the application proposes a TfL Cycle Hub. The Cycle Hub would be located within the ground floor of Building A and would have capacity for 71 cycle spaces. The provision of the cycle hub is welcomed by the Council's Highways Authority and TfL, and should also be supported by further measures to persuade commuters to cycle. However, to enable modal shift, it would be necessary to provide more than cycle storage; route planning, cycle training and cycle hire may increase the likelihood of people actually making a change. The TA Addendum submitted proposes a Station Travel Plan as one suitable measure to encourage the modal shift. This would establish a set of targets, initiatives, and measures to minimise the number of cars using the station public car park, and promote more sustainable modes of travel including cycling. The Station Travel Plan would be secured through the S106 agreement. A financial contribution £25,000 is also proposed for improvements to the Jubilee Cycle route.

- 6.7.10 As set out in their consultation response, The Transport for London Spatial Planning Team (who are a statutory consultee for major planning applications) strongly support the reduction in commuter parking, and would encourage further reduction where possible. It was considered that this will contribute to the objectives of the Mayor's Transport Strategy, and Publication London Plan, to support mode shift away from car use and promote active travel. Furthermore, the consultation response noted that of the circa 5,000 daily station users, less than 4% use the station car park. Of those who park at the station, a third live within 2km of the station, and 45% within 5km, making walking, cycling and the bus attractive alternatives.
- 6.7.11 The car parking survey results in the TA detail that the existing parking restrictions in the road around Canons Park station seem to be working effectively. While the proposed reduction in capacity would result in a daily am and pm peak hour reduction of 200 two-way car trips, the Council's Highways Authority acknowledge that a reduction in station car parking capacity may lead to overspill parking on street. It is therefore possible that outside the hours of restriction, roads may begin to experience more parking demand and therefore it would be appropriate to monitor the situation with a view to increasing on-street parking controls as necessary. For this reason, the Council's Highway Authority have concluded that a reduction in the public station car parking can be accepted, provided suitable mitigation measures are introduced. This includes a financial contribution for further parking and towards the implementations of any measures should the studies identify specific requirements.
- 6.7.12 A number of public consultation responses identified existing capacity issues on buses, which would not make this a viable alternative to get to the station or the increased capacity arising from the development. The TA includes an impact assessment which considers that the reduction in car parking spaces (and expected increase in bus use to get to the station) is unlikely to affect the bus services capacity. Some consultation responses have also commented on the practicality of cycling in business attire, the cost effectiveness using the underground rather than alternative rail options, the need to provide commuting car parking spaces so people can commute (especially from out of London) and the consequential impact of the loss of parking which will force people to drive

into London. These are valid concerns. The submitted TA details the methodology applied in the quantum of car parking spaces which are to be retained and notes that a number of residents that use the car park do have the ability to utilise sustainable modes of transport to access the site or have viable alternative transport routes into London. It is acknowledged that travel patterns and habits may be affected in the short term, but as evidenced across London, cycling for business purposes has not been a hinderance, and can be a suitable alternative method should the appropriate facilities be provided. The Station Travel Plan would serve to further support the modal shift in addition to improvement that would be made to the Jubilee Cycle Route through S106 financial contributions.

- 6.7.13 Comments to the public consultation also made references to the use of the car park during event days at Wembley and the Hive, for visitors to Canons Park and for activities associated with the adjacent sports clubs/fields. The submitted TA details that Wembley stadium were contacted to ascertain their parking strategy moving forward and confirmed that NCP parking at Canons Park was not part of their formal parking offer in relation to events and is not advertised as such. Furthermore, Wembley stadium operator has confirmed that a new parking strategy 'park and rail' targeting 2,700 spectators coming from the M25 and M40 and a new coach strategy will be operated as needed. The primary use of the station car park is related to commuting for work purposes and its likely that the pay and display bays within Donnefield Avenue primarily support parking associated with the recreational purposes of Canons Park or the adjacent sports clubs. This is also reflected in the fact that the Station car park has a daily rate/charge, whereas the pay and display bays have a charger for every 20 minute stay, with a maximum stay of 4 hours.
- 6.7.14 A number of residents have raised concern about the particular impact on the reduced parking provision to those who are unable to use alternative modes of transport to reach the underground station. Reference has also been made to the preference of using the car park at night rather than using public transport. As noted above, the submitted TA evidences the quantum of station car parking spaces to be retained. Subject to appropriate mitigation measures, this would be supported by the Council's Highways Authority. It is noted from the consultation response that station car parking is well used, and is mostly used for commuting purposes (hence being full in the mornings). Therefore it is likely that the option for parking spaces would be available at night or on weekends (i.e when there is less demand for commuter parking). Officers acknowledge that there will be no access to station car parking during construction. However, a Station Travel Plan will be developed and will include a set of targets, initiatives and measures associated with promoting alternative modes of transport and will be implemented prior to construction beginning on site

Residential Car and Cycle Parking Provision

- 6.7.15 For the application site (outer London and PTAL 3), the Publication London Plan (2020) sets a maximum residential parking provision of 0.5 car parking spaces

per unit. The proposal is presented as a 'car free' development, and as such, would only provide blue-badge parking spaces in accordance with the Publication London Plan (2020). This approach is strongly supported by TfL as expressed in their consultation response.

- 6.7.16 The Council's Highways Authority have noted that large scale, car-free developments are usually best suited to high PTAL locations where public transport facilities are excellent and there are multiple conveniences within the immediate or near surroundings. While the supplied study in the TA gives statistical details on the likelihood of people to own cars and travel by car when living in car free developments and looks at the potential for sustainable trips in PTAL 3 locations, this does not mean that people will not own and drive cars regardless.
- 6.7.17 The Highways Authority further consider that there is likely to be a reduction in car ownership in comparison to a development where maximum levels of parking are provided, but not without some residents still keeping cars. Furthermore, the parking surveys supplied indicate that there is on-street capacity in the local area which may actually counteract the car-free intentions as many of the existing parking restrictions do not operate overnight or at the weekend meaning that residents of this development would be able to work around the hours of operation.
- 6.7.18 To provide for occasional vehicle trips for the future residents the consideration is made for one new Car Club to be provided within the development. A planning obligation has been included to commit the applicant to exploring this further and implementing the Car Club if an appropriate operator is found. Furthermore, the submitted TA Addendum confirms that the applicant is agreeable to a planning obligation which would ensure that residents (other than blue-badge holders) of the future development would not be entitled to a residents parking permit or a visitor parking permit. This would serve to further discourage car ownership for future residents.
- 6.7.19 The Highways Authority have concluded that the large-scale proposal combined with a reduction in public car parking may result in overspill on-street parking which would be detrimental to the surrounding highway network without appropriate mitigation. For this reason, it would be necessary to monitor on-street parking in the area surrounding the development before and after occupation to determine whether alterations to the CPZ hours are required. In the TA Addendum, the applicant has committed to undertaking further monitoring before and after occupation (of the residential development), to determine whether amendments to the existing CPZs and on-street parking restrictions are required, to address any potential overspill on-street parking impacts. A cap of £50,000 is also proposed for contributions towards the implementations of any measures should the studies identify specific requirements. The Council's Highways Authority have agreed to this approach.

- 6.7.20 In relation to the proposed cycle parking, the quantum to be provided (222 long stay and 8 short stay spaces) would be in accordance with the Publication London Plan (2020) requirements. The Council's Highways Authority have advised that the location of the 8 short-stay cycle spaces would need to be clarified. It is considered that there would be space within the development to accommodate this, and therefore the details can be secured by condition.

Residential Trip Generation and Accessibility

- 6.7.21 The site is within a short walk of a local parade of shops, open space and bus stops. Edgware town centre can be reached by a short bus ride or is within walking and cycling distance for those who wish to travel more actively. Edgware is a busy metropolitan centre with access to Northern line Underground services and a bus station.
- 6.7.22 The proposal includes alterations to the highway in Donnefield Avenue to improve the pedestrian experience leading to Canon's Park. The Council's Highways Authority have advised that while some of the proposed measures look aesthetically pleasing, they are not completely practical for this location. As a result, the raised table adjacent to the entrance of Canons Park and the on-street play equipment have been removed from the proposals. The Highways Authority consider that the proposal would not have a detrimental impact on the safety of the highway network.
- 6.7.23 Being car free, the residential element would generate very few car journeys. Public transport use would increase, however the TA includes an assessment of public transport impact that shows that there is sufficient capacity on buses and tube trains at this location.

Delivery, Servicing and Refuse Collection

- 6.7.24 The Delivery and Servicing Plan within the TA details that deliveries and waste collection associated with the residential units on the site will take place via Donnefield Avenue. The forecast trip generation for the proposed units anticipates 13 deliveries per day. The Council's Highways Authority have advised that while this might not be a significant number of journeys, as the road is a cul-de-sac it does mean that these vehicles would have to enter, turn around and exit. These manoeuvres will be in addition to the trips generated by the existing properties along the road and as online commerce increases, the number of delivery trips may also increase too. There is some concern about how this would impact on the pedestrian and cycle environment for Donnefield Avenue. For this reason, the Highways Authority have requested Delivery and Service Plan monitoring to be included alongside the Travel Plan requirements, and a detailed delivery and serving plan to be secured by condition.
- 6.7.25 In relation to residential waste collection, designated bin stores would be provided on the ground floor of each building. The residential waste collection would take place on-street from Donnefield Avenue and the waste collection vehicle would be able to pull up within the widened section of the highway, while

still being within a 10m distance to the waste stores within each building. Vehicle tracking of a waste collection was also undertaken. The application was referred to the Council's Waste Collection team, who have advised that the proposal would be acceptable in this regard.

Framework Travel Plan

- 6.7.26 A Framework Travel Plan has been submitted to provide the good practice mechanisms necessary to achieve a modal shift towards a more sustainable mode of travel. The measures would include marketing and promotion of sustainable travel modes and the provision of cycle parking spaces in accordance with London Plan standards. Implementation, monitoring and management of the Travel Plan would be undertaken by an appointed Travel Plan co-ordinator who would work in partnership with the Council and TfL.
- 6.7.27 The application was referred to the Council's Travel Planner who has provided further clarification on the specific detail that should be provided within the Travel Plan and its monitoring. A Full detailed Travel Plan for the residential development will therefore need be submitted post permission and secured via a section 106 Planning Obligation.

Construction Logistics Plan

- 6.7.28 Many of the residents within the locality have expressed concerns relating to the impact of the proposed development on the safety and functioning of the local road network. An outline Construction and Logistics Plan has been submitted with the TA which seeks to minimise the impact of construction on the surrounding highway network. Measures to reduce the impact include delivery scheduling, adherence to designated routes, split deliveries, and implementation of a staff travel plan.
- 6.7.29 The outline Construction and Logistics Plan was reviewed by the Council's Highways Authority and is considered to be acceptable. The submission of a detailed Construction and Logistics Plan is required to be provided prior to commencement of the development and is to be secured by a pre-commencement condition.

Highway Works and Mitigation

- 6.7.30 The proposed off-site highway works would consist of:
- Highway and pavements re-surfacing
 - Western pavement widening (beyond the current adopted highway line) to provide 2.3m wide pavement
 - Two new highway widenings will be introduced to the eastern side to allow for vehicular passing points and to be used for deliveries and waste collection
 - The new widenings will feature double yellow line and a plate to state 'Loading only'

6.7.31 As detailed above, various strategies are proposed to mitigate the impacts of the proposed development. In addition to the provision of a designated TfL Cycle Hub and the cycle stores for the proposed residential development, a Station Travel Plan and Residential Travel Plan would be secured through a section 106 Planning Obligation. Furthermore, the legal agreement would also secure further studies and a contribution for the implementation of measures (should the need for specific CPZ measures be identified), and a parking permit planning obligation is also required. Officers consider that these measures would serve to better implement the modal shift while ensuring the proposal does not have a detrimental impact on the safety and functioning of the highway.

Summary

6.7.32 Overall, and subject to the planning conditions and s106 obligations mentioned above, officers consider that the transport impacts of the proposal are acceptable and would accord with the aim and objective of the relevant policies.

6.8 Landscape and Ecology

6.8.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2016): 5.11, 7.19, 7.21
- The Publication London Plan (2020): G6, G7, G8
- Harrow Core Strategy (2012): CS1
- Harrow Development Management Policies (2013): DM20, DM21, DM22

Landscaping

6.8.2 Donnefield Avenue is a relatively quiet residential cul-de-sac and forms a key link to one of the main entrances to Canons Park. The western side of Donnefield Avenue is dominated by car parking with street parking bays provided along almost the entire length of the road and the pedestrian footpath on the western side of the road towards Canons Park is narrow, with an approximate width of 1.5m for the paving, and a further 1.4m width provided by the grass verge.

6.8.3 A Landscape and Public Realm Strategy produced by Townshend Landscape Architects has been provided with the application and incorporated within the proposed development. The landscape masterplan seeks to provide four key landscape character areas which would help to define public or semi-private areas and their associated characters:

- Social Street: Improvements to Donnefield Avenue which will create social spaces for residents on the street as well as enhancing the approach to Canons Park for visitors
- Park Entrance: playful pocket space adjacent to the Canons Park entrance which forms part of a play trail along Donnefield Avenue.
- Community Garden: A new semi private garden for families to play and socialise

- Planting Buffer: Providing a visual amenity and enhancing biodiversity adjacent to the SINC.

- 6.8.4 The proposals applied in the strategy are in line with TfL's Healthy Streets Guidance and include social spaces provided for through street furniture and seating along Donnefield Avenue, street greening in the form of rain garden planting and defensible space to the ground floor units through appropriate planting.
- 6.8.5 In relation to the 'social street' landscape character area, the Landscape and Public Realm Strategy suggests that the connections to Canons Park will be improved, encouraging people to walk and cycle. Street furniture, tree planting, pedestrian materiality and rain gardens would invite people to use the space and improve safety and comfort. Furthermore, the carriageway width would be visually narrowed using paved surface finishes in the parking bays to slow traffic and improve the environment for pedestrians and cyclists. The Council's Landscape Officer has advised that the proposed planting in the rain gardens would look attractive, if the plants survived and there was a sufficiently intensive management and maintenance plan.
- 6.8.6 It was noted that the play elements for children along embedded alongside the proposed raingardens through natural elements such as boulders and stepping logs was an additional element proposed as part of the social street character area. However, during the course of the application, comments raised by the landscape and highways officers expressed concern at the suitability of this element, given the proximity of the proposed play equipment to the parking bays, and the potential obstructions and subsequent safety implications that could arise. Furthermore, it was considered that the confined space for the planting and they would be easily susceptible to trampling by children. For this reason, the on-street play element has been removed from the landscaping proposals.
- 6.8.7 The second landscape character area within the strategy is the 'Canons Park entrance', which seeks to celebrate the arrival point to Canons Park. The improvements proposed included the provision of a raised table at the of the cul-de-sac and the provision of seating, planting and natural play equipment within the pocket park proposed adjacent to the entrance. Following concerns raised by the Council's Highways Authority during the course of the application, the raised table was omitted from the proposed landscaping proposal.
- 6.8.8 The 'community garden' is the third landscape character area proposed and is intended to provide a social and playful green space for the use of residents. Although the garden is gated from the street, a visual connection would be maintained to provide natural surveillance from the street. As with the pocket park, the Council's Landscape Officer has noted that the spaces within proposed communal gardens will need to work very hard as they are both multifunctional spaces and the various proposed uses are ambitious for the small spaces.

- 6.8.9 As the proposed development is required to reprovide an appropriate level of station car parking and maintain an emergency access route for the TfL Crane, the rear of buildings B and C would be dominated by a surface level car park and hardstanding. Where there would be suitable space for planting, the landscape strategy seeks to provide woodland buffer planting and reinforced wildflower turf, as the fourth landscape character area.
- 6.8.10 It is considered that the proposed Landscape Strategy is appropriate to the proposed development, the constraints of the subject site, and the relationship of the site to its surroundings. The proposal would provide a well defined and enhanced pedestrian route along the western side of Donnefield Avenue to Canons Park and streetside planting areas, street trees, planting within the car park and communal gardens would positively enhance the streetscape and public realm and contribute towards the aspirations of the Mayor's Healthy Streets initiative.. The Council's Landscape Officer has highlighted areas where further information will be required to ensure that the Landscape Strategy's proposals can be effectively realised. It is considered that these matters can be adequately addressed through appropriate landscaping conditions relating to detailed hard and soft landscaping, boundary treatment and a landscape management and maintenance plan. Subject to this, the application would accord with the relevant policies in this regard.

Trees

- 6.8.11 An Arboricultural Impact Assessment produced by MiddleMarch Environmental has been submitted with the application. The report details that the proposed development has been designed so that, where possible, existing trees are retained. The trees adjacent to the northern boundary of the site are 'protected' by virtue of their siting within the Canons Park Estate Conservation Area.
- 6.8.12 In order to accommodate the proposed development, the report identifies that it will be necessary to remove 2 'C' retention category Ash (T5 and T6) and a 'C' retention category Cypress Leylandii group (G7) which are all assessed as being of low retention value (category C). The trees in question are all located along the eastern perimeter of the site fronting Donnefield Avenue and do serve to naturally screen the application site, particularly along the north end and in views from Canons Park. Clearly, the loss of so many trees is regrettable. However the Report's assessment of their quality demonstrates that they are not of significant amenity value (in relation to their quality/condition) and, therefore, need not be an impediment to the redevelopment of this Local Plan allocated site.
- 6.8.13 It is noted that the proposal would the proposed development would primarily require the installation of new hard surfaces within the Root Protection Areas (PRAs) of retained trees adjacent to the northern and western boundaries of the application site. As the site is already hard-surfaced, the report considers that the potential for harm to occur to the trees as a result of the works is minimal, subject to the adoption of appropriate works methodologies. Mitigation and avoidance measures include the implementation of construction exclusion zones and tree protection barriers.

6.8.14 The proposed site plan and tree planting strategy demonstrates that there is scope for new tree planting within the development. The provision of adequate (in terms of number) and appropriate (in terms of species) tree planting can be secured, by condition of planning permission, as part of the hard and soft landscaping details. It is noted that Catalyst will retain a long-term interest in the site as the Registered Provider managing the residential accommodation and will therefore be responsible for the management and maintenance of the tree planting. In order to ensure the appropriate aftercare and maintenance of the proposed trees, this will be secured through the Landscape Maintenance and Management Plan condition. Subject to the appropriate conditions, the proposal would accord with the relevant policies in this regard.

Biodiversity

6.8.15 The western and northern boundaries of the site adjoin the Borough Grade II Canon's Park and Stanmore Railway Embankments Site of Importance for Nature Conservation (SINC) which incorporates Canons Park. This provides part of a strategically important Green Corridor connecting part of the chain of important sites at the northern end of the borough with more residential and more heavily urbanised sections. The wider SINC area has some lateral green links to the Borough Grade II SINC's of Stanmore Marsh and Canons Lake and the Basin but the area of the borough south of the site is highly deficient in provision of access to nature and the benefits which this offers.

6.8.16 An Ecological Impact Assessment (EIA) produced by Middlemarch Environmental has been submitted with the application. In relation to the adjacent SINC, the EIA details that in the absence of mitigation, construction activities could result in physical damage or disturbance to the adjacent habitats, through compaction of soils and damage to the roof stock. In addition, there is the potential for this site to be temporarily adversely impacted during the construction phase of the development as a result of a localised increase in air pollutants (e.g nitrogen and dust deposition) from construction traffic and activities. The EIA identifies that these impacts would result in an adverse effect, significant at up to the Local (Borough) level. However, subject to the implementation of suitable protection measures, which can be secured by condition, these adverse impacts can be avoided altogether and therefore no significant residual effect on the SINC is anticipated.

6.8.17 In relation to habitats, the EIA details that the proposed development will result in the permanent loss of small pockets of introduced shrub and tall ruderal vegetation, the narrow linear strip of semi-improved grassland along the western boundary, the poor intact hedgerow along the eastern boundary and the young scattered trees in the southern and eastern parts of the site. Considered individually, the loss of these common, widespread habitats, which are of low ecological value and can easily be replaced, is of negligible significance. However, together, these habitats contribute to the structural diversity of the site and their loss in combination is considered to be an adverse effect, significant at the Local (Site) level. The EIA acknowledges that the loss of these habitats

cannot be avoided or mitigated for, although the creation of ecologically valuable habitats, which have been incorporated into the design of the development, will provide compensation and enhancement to address the residual effect.

- 6.8.18 Turning to the impact on species, the EIA details that the surveys undertaken identified no suitable roosting habitat on site for bats, and therefore there will be no adverse significant effect on the status of any populations of bats utilising the site for roosting purposes. The retention of the vegetation within the adjacent railway embankment will ensure that bats can continue to forage and commute into the wider landscape. The site clearance during the construction phases of the proposed development will result in the loss of scattered trees and hedgerow, which are likely to provide nesting opportunities for a variety of bird species during the breeding season. However, the EIA considers the loss to be temporary as the new buildings and areas of tree and ornamental shrub planting included within the landscaping proposals will provide replacement nesting opportunities for those lost. The report also details that the impact of the development upon any local badger populations, reptiles and hedgehogs that could damage or disturb their habitats, or cause direct harm or injury to the respective species during construction phase would be safeguarded through an appropriate Construction Ecological Plan which can be secured by condition.
- 6.8.19 In relation to the impact of the development on the SINC once complete, the EIA confirms that the railway embankment section of the SINC is not accessible, and therefore is considered unlikely to be subject to any increased recreational pressure from the residential development. Lighting impacts would have to be carefully considered to reduce the residual effect of lighting on bat populations utilising the embankment for foraging and commuting to a level at which it is not significant. Although Canons Park is accessible to the public and is likely to already be subject to reasonably high levels of use, the EIA notes that an increase in human presence within the site could lead to an increase in issues such as trampling or disturbance of sensitive vegetation, accumulation of litter and setting of fires, which could result in the degradation of the habitats for which the site is designated. Subject to the implementation of suitable access management measures, which can be detailed in a Biodiversity Enhancement and Management Plan (BEMP), secured by condition, these impacts can be reduced to a level that is not significant.
- 6.9.20 The EIA also addresses the impact of the operational development on species. Notably, the proposal would result in habitat creation in the form of buffer planting adjacent to the railway which will reduce light spill for bat foraging and commuting features. Furthermore, while badgers and hedgehog might cross the site for foraging and commuting purposes, the operational use of the development will result in less vehicle movements within the site and therefore the risk of road related mortality for badge, hedgehog and nocturnal species is considered to be low. The operational use of the proposed development may lead to the disturbance of habitats used by nesting birds, arising from increased movement and noise from vehicles and people, but will vary in extent depending on the proximity of the next to the areas exposed to disturbance. The proposal could result in the reduction of suitable opportunities for nesting birds within the site.

However, this would be potentially mitigated by the provision of bird and bat boxes within the external fabric of the proposed buildings. As such, no significant residual effect on bird populations is anticipated.

- 6.9.21 The EIA details a range of mitigation, compensation and enhancement measures. This includes the submission of a Construction Ecological Management Plan, to be secured through a condition, which would set out the necessary timings and safe working practices that will be required to minimise disturbance and impacts on habitats and species during the construction phase. A series of habitat creation proposals have been incorporated into the design of the proposed development, providing both compensation and enhancement. The proposals include additional tree planting, herbaceous planting, green roofs, small sections of hedgerow, bat and bird boxes and a habitat structure within the community garden area. These would be implemented through a Biodiversity Enhancement Management Plan and could increase the habitat diversity at the site over the medium to long term, which would have an overall beneficial effect at a local level.
- 6.9.22 The application was referred to the Council's Biodiversity Officer who has noted that some of the impacts have not been adequately evaluated or quantified, particularly in relation to the indirect impacts on the adjoining SINC site and role of the green corridor of which it forms part. Furthermore, there is a lack of detail in relation to the landscaping and biodiversity/mitigation measures and there are some discrepancies between the information provided by the various supporting documents. Notwithstanding this, it will be important to ensure that the biodiversity enhancements to be incorporated within the design will be likely to be successful and appropriate to the context of the site, adding value to the adjoining SINC areas and their linking role and the indirect impacts on the SINC are quantified, and mitigated, and additional measures undertaken either within the railside area or other sections so that any scheme that is permitted will result in net gains for the SINC and the species which are dependent on it.
- 6.9.23 The Council's Biodiversity Officer considers that the required information could be appropriately addressed through planning conditions and planning obligations to ensure that the proposed measures are consistent with the expectations of the relevant policies which seek to protect biodiversity and access to nature, enhance green infrastructure, and provide net gain for biodiversity.

6.9 Climate Change and the Environment

6.9.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2016): 5.1, 5.2, 5.3, 5.4, 5.5, 5.6, 5.7, 5.12, 5.13, 5.15, 5.18, 5.21, 7.14, 7.15
- The Publication London Plan (2020): GG6, D14, SI1, SI2, SI3, SI4, SI5, SI12, SI13
- Harrow Core Strategy (2012): CS1T, CS1U, CS1W, CS1X
- Harrow Development Management Policies (2013): DM9, DM10, DM12, DM13, DM14, DM15

Flood Risk and Sustainable Drainage

6.9.2 The application site is located within Environment Agency Flood Zone 1 and is therefore at low risk of flooding from watercourses. The West London Strategic Flood Risk Assessment (SFRA) shows that the north-western tip of the application site is also within Surface Water Flood Zone 3a. The application is supported by a Flood Risk and Sustainable Drainage Report prepared by Price & Myers.

6.9.3 In relation to Flood Risk, the submitted report details that the site's topography shows there is a flat area at the northwest corner of the site where surface water will pond in extreme storm events. The proposed levels will be set to direct surface water to the proposed drainage system and discourage local ponding. New surface water drainage will be installed for the proposed development that will be able to accommodate the 1 in 100 plus climate change storm event and the system will restrict surface water to 5 l/s per hectare. The car park currently discharges unrestricted flows to the public sewers, therefore the development proposals will significantly reduce surface water flood risk and overland flows.

6.9.4 With regard to utilising sustainable urban drainage systems, it is proposed to attenuate surface water runoff using permeable paving, blue roofs, a tree pit and 2 underground cellular attenuation tanks. An indicative surface water maintenance strategy has also been provided to ensure successful implementation of the sustainable urban drainage systems.

6.9.5 The application was referred to the Council's Drainage Team have advised that the information provided within the Flood Risk and Sustainable Drainage Report is satisfactory. The proposed drainage strategy will need to be reviewed at the detailed design stage and at the recommendation of the Council's Drainage Team, it the details of surface water attenuation and disposal can be controlled by conditions. It has also been recommended that details of the foul water disposal system and permeable paving be controlled by condition. Through such controls it will be possible for the Council to ensure that separate surface water and foul water drainage systems are implemented, reducing the risk of foul water flooding and water contamination. Subject to conditions, the proposal would accord with the relevant policies in this regard.

Carbon Dioxide Emissions Reductions

- 6.9.6 The overarching target for development in the Publication London Plan (2020) is for major developments to be net 'zero-carbon', with this preferably achieved on site. A minimum on-site reduction of at least 35 percent beyond Building Regulations is required for major development. Where it is clearly demonstrated that the zero-carbon cannot target cannot be fully achieved on-site, any shortfalls should be provided through a cash in lieu contrition to the Council to undertake carbon emissions reductions elsewhere in the borough. The policy seeks to reduce reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy of 'be lean; be clean; be green; and be seen'.
- 6.9.7 An Energy Assessment prepared by Couch Perry Wilkes has been submitted with this application. The energy strategy details a range of methods, relative to the London Plan energy hierarchy, that would achieve an overall on-site carbon reductions of 48%, which is in excess of the Minimum 35% required in the London Plan.
- 6.9.8 With regard to using less energy ('be lean'), the Energy Assessment attributes residential CO₂ savings of 22% from measures that would reduce energy demand on the site. The energy demand minimisation would be through effective building form and orientation, good envelope design, proficient use of services, efficient ventilation systems, high performance lighting and efficient communal heating and hot water systems.
- 6.9.9 The 'be clean' (supplying energy more efficiently) measures, the Energy Strategy details that there are no existing or potential future district heating networks planned in the area of the proposed development and therefore no proposal is made for connection to a decentralised energy network. In this particular instance (having regard to the specific development, site and location), the omission of a district energy network plant room is considered acceptable given that there is relatively low likelihood of a wider district heat network coming forward in the foreseeable future and the potential impact that such plant room provision would have on the footprint and bulk of the development (with potential for further impact other material planning considerations).
- 6.9.10 The remaining 26% residential CO₂ savings would come from the 'be green' (renewable energy) stage of the energy hierarchy. This would be achieved through the provision of an Air Source Heat Pump (ASHP). The 26% savings from the ASHP are based on a conservative assumption that high temperature ASHPs will be used; subject to planning permission being granted and more detailed assessment, alternative ambient temperature pumps maybe used instead, with greater carbon savings. Notwithstanding this, a pre-commencement condition will need to be applied to any permission requiring the submission of a revised energy strategy that takes into account the more detailed assessment / design of the proposed ASHP system. A pre-commencement condition is considered necessary as the detailed design of the ASHP will influence the

detailed design of the rest of the scheme, including potentially at foundations / lower level stages.

- 6.9.11 As the development would not be able to achieve the 'zero carbon' requirement on site, the remaining 52% (65 tonnes) of carbon would be offset at the current GLA rate of £1,800 per tonne (£60 per tonne / year x 30 years), equating to a contribution of circa £117,000 (note: once the publication version of the London Plan is finally published, a higher rate will apply). Subject to appropriate conditions and the necessary planning obligations, the proposal is considered to be acceptable in this regard.

Sustainable Design and Construction

- 6.9.12 As detailed in the preceding sub-section, the proposal would achieve the target for CO₂ emissions reductions through on-site methods in conjunction with a carbon off-set contribution.
- 6.9.13 With regards to overheating and cooling, an Outline Modelling Overheating Analysis undertaken by Couch Perry Wilkes has been submitted with the application. As part of the proposed development, in order to reduce overheating and reliance on active cooling systems, several detailed passive design measures have been considered. This includes high performance fabric and facades, green areas, thermal mass specifications, energy efficient lighting and appliances, mechanical ventilation and through the layout of the proposed development, with occupied rooms being generally east or west facing.
- 6.9.14 The results of the Overheating Analysis demonstrate that the proposed scheme would comply with the relevant criteria using DSY1 weather data. However, it is noted that during more extreme weather scenarios, the temperatures experienced within the flats do not demonstrate compliance. It is therefore considered that further passive measures should be considered in accordance with the relevant policies, to avoid the risk of overheating now and in the future climate. To ensure the highest possible levels of comfort to future residential occupiers without the need for mechanical cooling systems (i.e. air conditioning), it is considered that an assessment of the potential for overheating to all flats within the development should be carried out and that detailed measures to sustainably mitigate conditions within those particular flats where overheating would occur should be required, as a condition of any planning permission.
- 6.9.15 The proposed waste and recycling arrangements arising from the proposed development are dealt with in a separate section of this report. It is considered that the design and layout of the proposal would ensure that future occupiers of the development contribute to the Borough's good record in managing down the amount of waste sent to landfill and improving rates of recycling.
- 6.9.16 The submitted Sustainability Statement by CBRE details that the construction phase sustainability will be managed through a robust Construction Environmental Management Plan, which has been provided with the application.

This would allow for the efficient handling of construction, excavation and demolition waste from the site.

- 6.9.17 In relation to Green Infrastructure, local biodiversity would be improved by selecting native species to enhance ecological value. The development would also seek to minimise water consumption with the residential units designed to achieve the consumption target of 110l/p/d or less as set out in Building Regulations Part G.

Decentralised and Renewable Energy

- 6.9.18 The London Plan applies a hierarchy to the selection of appropriate energy systems for major development proposals, while the Development Management Policies Local Plan Document supports decentralised energy networks and seeks connection to existing systems where feasible. As detailed within the Carbon Dioxide Emissions Reduction subsection above, the omission of a district energy network plant room is considered acceptable in this instance. The proposed site wide ASHP is therefore consistent with the next preference (for site-wide networks) of the hierarchy. As there are no adjacent allocated development sites, nor any adjacent sites currently being promoted for redevelopment, it is not considered necessary to build-in facilities to extend the network beyond the site boundary.

Air Quality

- 6.9.19 The whole of the borough has been designated as an Air Quality Management Area (AQMA), due to exceedances of the annual mean objective levels for nitrogen oxide (NO₂) and particulates (PM₁₀). An Air Quality Assessment (AQA) by ACCON UK has been submitted with the application.
- 6.9.20 In relation to the operational impact assessment, it is noted that there will be a reduction in station car parking spaces from 162 commuter car parking spaces to 60 spaces and the proposed development would be car free. The AQA details that the proposed development will not have an impact on local traffic flows and air quality because any traffic generated to and from the development will be offset by the overall reduction in station car parking movements. The AQA modelling also predicts that there will be no exceedances of the nitrogen dioxide or particulate matter objectives at the sensitive development receptors on the site, and therefore it is not deemed necessary to include any mitigation measures for the proposed development.
- 6.9.21 Therefore, in terms of the site and its immediate surroundings, the proposal would not increase exposure to poor air quality and measures to address localised or on-site air quality at operation phase are not necessary. With regards to the air quality implications of the development during the construction phase, it is considered that the submission for an Air Quality and Dust Management Plan be in place during construction, which can be secured as a condition of planning permission.

Contaminated Land

- 6.9.22 A Ground Investigation Report produced by Geotechnical & Environmental Associates Limited has been submitted with the application. In relation to Soil Contamination, eight samples of shallow soil were tested for a range of contaminants. Asbestos fibres were identified in addition to lead and hydrocarbon contamination. The report recommends further sampling and testing to determine the extent of the contamination encountered, particularly in areas of proposed landscaping.
- 6.9.23 The Council's Environmental Health Officer has recommended further site investigations, a written method statement providing details of the remediation scheme and a watching brief strategy during groundworks for unexpected contamination which can be secured by condition. Subject to this, the proposal would be acceptable in this regard.

6.10 Planning Obligations and Infrastructure

- 6.10.1 The relevant policies are:
- National Planning Policy Framework (2019)
 - The London Plan (2016): 8.2
 - The Publication London Plan (2020): D2, DF11
 - Harrow Core Strategy (2012): CS1Z
 - Harrow Development Management Policies (2013): DM50
 - Planning Obligations and Affordable Housing Supplementary Planning Document (2013)
- 6.10.2 Residents have raised legitimate concerns about the impact of the proposed development on local infrastructure and services. Particular emphasis has been placed on the current pressure on health facilities, schooling public services. The Harrow Community Infrastructure Levy (CIL) was introduced on 16 September 2013. The Council is committed to using CIL revenues and other funding sources to help deliver social, economic and environmental infrastructure to support and meet the demands arising from development. The CIL receipts are not tied to a specific site, and therefore CIL receipts can be utilised from developments across the borough to address areas with the highest need for additional infrastructure. It is also important to note that CIL is only a modest element of the broader infrastructure funding pot, with schools predominately funded by the Education and Skills Funding Agency (ESFA) and GP clinics by the NHS (as examples) where there is a demonstrable demand.
- 6.10.3 Furthermore, the proposal may in part address issues of overcrowding in existing households in Harrow, as well as 'concealed' households (i.e. adult children still living with their parents but seeking to move out, subject to being able to afford to do so). Therefore, not all future residents of the development will be new residents to the borough that would require additional infrastructure provision. Nevertheless, if additional capacity to social infrastructure was deemed necessary in the future, this would be addressed through the appropriate services utilising the necessary funding streams.

- 6.10.4 Pursuant to the consideration within the previous sections of this report, and in line with the policies detailed, Officers do however propose to secure a number of planning obligations required to appropriately mitigate the impact of the proposed development. Additional commentary is provided below to inform the proposed detailed drafting of a section 106 legal agreement;

Affordable Housing

- 6.10.5 A planning obligation is recommended to secure the affordable housing mix and tenure as submitted and the provision of 2 x wheelchair adapted affordable rent units. Furthermore, as detailed in the report, the weight affordable to the housing output proposed, is in part, due to the consideration that the proposed shared ownership units would represent a genuinely affordable housing option for residents in Harrow. In order to ensure this remains the case, a cascade mechanism is proposed which provides priority bands and an income cap.
- 6.10.6 Priority Band 1 would be for those whose primary place of residence or work at the date of purchasing the relevant London Shared Ownership Unit falls within the London Borough of Harrow. The proposed Shared Ownership units would be marketed to these eligible purchasers for no less than 3 months. Following the expiry of the relevant period, Priority Band 2 would be for those prospective purchasers whose primary place of residence at the date of purchasing the Shared Ownership Unit is within London Boroughs of Harrow, Hounslow, Ealing, Brent, and Hillingdon. The proposed Shared Ownership units would again be marketed to these eligible purchasers for a further period of no less than 3 months. Following the expiry of this period, the marketing would be for all eligible purchasers. An income cap sets out the maximum gross annual household income for the respective Shared Ownership dwelling mixes.

Transport and Highways

- 6.10.7 As detailed within the report, the Council's Highways Authority consider the reduction in station parking and the proposed car free proposal of the proposed residential development to be acceptable, provided suitable mitigation measures are introduced. A financial contribution would be provided for the additional parking surveys (to be carried out prior to occupation and post occupation of the 100th flat) and implementation of specific CPZ measures should specified measures be identified. The financial contribution shall be capped at £50,000. A planning obligation would also be included to ensure the development would be 'resident permit restricted' and that all marketing/advertising material makes reference to the fact that future owners, occupiers and tenants (other than those registered disabled) will not be entitled to apply for a resident parking permits or a visitor parking permit. All sales and lettings agreements would also contain a covenant to the effect. The submitted Transport Assessment makes reference to the provision of a car club space being secured for the benefit of the future residents. An obligation is therefore included to commit that the developer to investigate and if appropriate, make reasonable endeavours to implement a car club scheme at the site throughout the life of the development.

- 6.10.8 A Framework Travel plan was submitted with the application. In order to deliver the car free aspirations, a revised Residential Travel Plan to be submitted to the Council prior to the first occupation of the building. A travel plan bond (to be agreed with the Council) will be required to secure the implementation of all measures specified in the revised Travel Plan. The developer to ensure the effective implementation, monitoring and management of the travel plan for the site. During the course of the application, at the request of the Councils Highways Authority, the applicant also confirmed their agreement to include a Station Travel Plan. Like the Residential travel plan, a detailed Station Travel Plan would be submitted to the Council prior to commencement of development.
- 6.10.9 A number of alterations are proposed to Donnefield Avenue. In order to facilitate these works, the developer would be required to enter into a Section 278 agreement. A financial contribution of £25,000 will be secured for improvements to the Jubilee Cycle Network.

Children and Young People's Play Space

- 6.10.10 As noted in the report, the proposed development would fail to provide the appropriate quantum of designated Children's Play Space. However, given the proximity to exceptional play opportunities provided within Canons Park, the planning benefits of the scheme delivering 100% affordable housing, and the scope to provide some designated play space for smaller children within the communal amenity spaces, officers consider that a financial contribution to fund off-site provision of play space and equipment for the shortfall would be acceptable in this instance. The exact contribution will be determined following submission of an appropriate play strategy (to be secured by condition), which would detail the exact quantum of children's play space that would be provided within the development.

Heritage

- 6.10.11 A financial contribution of £10,000 for the repair of the Grade II Listed 18th Century Memorial Garden Walls within Canons Park. Officers consider that the financial contribution towards the repair of this heritage asset which lies within the Grade II Listed Canons Park, would improve the character and appearance of the Registered Park and Garden, and Canons Park Estate Conservation Area and would constitute a public benefit.

Biodiversity

- 6.10.12 The submission of a Biodiversity Enhancement Management Plan to accurately determine the impact of the development and identify mitigation and net gains, including calculation of any monetary contributions for offsite works. If offsite works are required, this would be secured through a financial contribution.

Carbon Offset

- 6.10.13 A financial contribution prior to commencement of the development for the shortfall in on-site carbon reductions required to achieve net zero carbon in line with the GLA rates. As noted in the relevant subsection within the report, the submitted Energy Strategy details that 65 tonnes of carbon would need to be offset to achieve the 'zero carbon' requirement on site. This would be offset at the current GLA rate of £1,800 per tonne (£60 per tonne / year x 30 years), equating to a contribution of circa £117,000 (note: once the publication version of the London Plan is finally published, a higher rate will apply). The exact amount payable will be dependent on the submission of a detailed revised energy strategy which is to be secured as a pre-commencement condition.

Design Review and Design Code

- 6.10.14 An undertaking by the developer to the existing architect (or one of equivalent standard) until the development is completed; or, the submission of a Design Code for approval by the Council that details the quality of the external materials of the finished development and other design parameters

Employment and Training

- 6.10.15 In accordance with the Council's Planning Obligations SPD, the Council's Economic Development team have requested that the developer provide a Training and Recruitment Plan and use all reasonable endeavours to secure the use of local suppliers and apprentices during the construction of the development. Furthermore, a financial contribution is required to fund monitoring and implementation of the plan. Such provisions are considered necessary to optimise the local economic benefits of the construction phase of the development. It is therefore recommended that appropriate provisions be made as part of a Planning Obligation.

Legal costs, administration and monitoring

- 6.10.16 A financial contribution (to be agreed) to be paid by the developer to the Council to reimburse the Council's legal costs associated with the preparation of the planning obligation and a further (to be agreed) to be paid to reimburse the Council's administrative costs associated with monitoring compliance with the obligation terms.

7.0 PLANNING BALANCE AND REASONS FOR APPROVAL

- 7.1 The statutory position is that planning applications have to be determined in accordance with the development plan unless material considerations indicate otherwise. The relevant policies have been set out within the report above.
- 7.2 The proposed development would make efficient use of brownfield land in a sustainable location and would bring forward housing and retain an appropriate quantum of commuter parking in conformity with the site's allocation in the Local Plan. The proposal would therefore accord with the spatial strategy for growth as set out in the development plan. This carries significant weight.
- 7.3 The delivery of 118 new affordable-tenure homes is considered to constitute a public benefit which contributes to the achievement of local policies, the strategic level need for new (affordable) homes for London and the Government's policy objective of boosting significantly the supply of homes. This is decisive given the acute and widely recognised need for more affordable-tenure homes in London. The 22 family-sized Affordable Rent units would meet the priority need within the Borough and 96 the Shared Ownership units would represent a genuinely affordable option for residents in Harrow. Officers consider that this should be afforded moderate weight.
- 7.4 Subject to appropriate conditions and planning obligations, the proposal would enhance biodiversity, provide landscaping and public realm improvements, appropriately address surface water flood risk, improve drainage measures, and contribute towards sustainable patterns of travel and healthy streets. These are all given moderate weight. Reasonable weight is afforded to economic benefits that would arise from the provision of employment opportunities during the construction phase and the spending power from 118 new households within the local area. Taken a whole, these benefits range from moderate to significant in magnitude and can all be regarded as public benefits of the proposal.
- 7.5 Weighing against the proposal, is the 'less than substantial harm' to the settings of the Canons Park, a grade II listed Historic Park and Garden, and the Canons Park Estate Conservation Area. Having special regard to the desirability of preserving listed buildings and their setting in line with Section 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, and paragraph 193 of the NPPF, officers consider that the public benefits of the proposal would provide clear and convincing justification and are collectively sufficient to outbalance the identified 'less than substantial' harm to the significance of the heritage assets. The balancing exercise under paragraph 196 of the Framework is therefore favourable to the proposal. This is an important material consideration.
- 7.6 The proposal would result in a reduction in the levels of daylight and sunlight to some of the adjacent properties beyond BRE guidelines. Furthermore, a limited number of proposed single-aspect units facing the railway may be exposed to unsatisfactory levels of noise. These factors weigh against the proposal.

- 7.7 The proposed development has been conceived through an extensive design-led approach and has undergone robust design scrutiny. The proposal would be of a high-quality design and appearance. However, the positive aspects of the design would be partly diminished by the shortcomings with regard to daylight and sunlight impacts, noise and heritage in particular. The quality of the design would therefore be broadly neutral in the planning balance.
- 7.8 For all these reasons, the material considerations and benefits in favour of the proposal would outweigh the harm. In accordance with the NPPF, including its presumption in favour of sustainable development, officers recommend that the planning application should be approved, and planning permission granted, subject to the section 106 Planning Obligations and schedule of conditions.

APPENDIX 1: Conditions and Informatives

Conditions

1. Timing

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

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

2. Approved Plans and Documents

Save where varied by other planning conditions comprising this planning permission or unless otherwise agreed in writing by the local planning authority, the development hereby permitted shall be carried out in accordance with the following approved plans to show the redevelopment of existing public car park to provide new residential accommodation (Use Class C3) of 118 units across three 7 storey buildings. Provision of a TfL Cycle Hub (Use Class Sui Generis), and the re-provision of a 60 space public car park and four residential wheelchair accessible parking spaces together with associated access, cycle parking, public realm works and landscaping

Plan numbers:

446-KCA-XX-XX-DR-A-0100-P, 446-KCA-XX-XX-DR-A-0101-P, 446-KCA-XX-XX-DR-A-0102-P, 446-KCA-XX-XX-DR-A-8000-P Rev 01, 446-KCA-XX-XX-DR-A-8004-P Rev 01, 446-KCA-XX-XX-DR-A-1000-P, 446-KCA-XX-01-DR-A-1001-P, 446-KCA-XX-02-DR-A-1002-P, 446-KCA-XX-03-DR-A-1003-P, 446-KCA-XX-04-DR-A-1004-P, 446-KCA-XX-05-DR-A-1005-P, 446-KCA-XX-06-DR-A-1006-P Rev 01, 446-KCA-XX-07-DR-A-1007-P Rev 01, 446-KCA-XX-XX-DR-A-2000-P, 446-KCA-XX-XX-DR-A-2001-P Rev 01, 446-KCA-XX-XX-DR-A-3000-P Rev 01, 446-KCA-AX-00-DR-A-1100-P, 446-KCA-AX-01-DR-A-1101-P, 446-KCA-AX-02-DR-A-1102-P, 446-KCA-AX-03-DR-A-1103-P, 446-KCA-AX-04-DR-A-1104-P, 446-KCA-AX-05-DR-A-1105-P, 446-KCA-AX-06-DR-A-1106-P, 446-KCA-AX-07-DR-A-1107-P, 446-KCA-AX-XX-DR-A-2100-P, 446-KCA-AX-XX-DR-A-2101-P, 446-KCA-AX-XX-DR-A-3100-P, 446-KCA-AX-XX-DR-A-3101-P, 446-KCA-AX-XX-DR-A-3102-P, 446-KCA-AX-XX-DR-A-4001-P, 446-KCA-AX-XX-DR-A-4002-P, 446-KCA-AX-XX-DR-A-4101-P, 446-KCA-AX-XX-DR-A-4102-P, 446-KCA-AX-XX-DR-A-4103-P, 446-KCA-AX-XX-DR-A-4104-P, 446-KCA-BX-00-DR-A-1100-P, 446-KCA-BX-01-DR-A-1101-P, 446-KCA-BX-02-DR-A-1102-P, 446-KCA-BX-03-DR-A-1103-P, 446-KCA-BX-04-DR-A-1104-P, 446-KCA-BX-05-DR-A-1105-P, 446-KCA-BX-06-DR-A-1106-P, 446-KCA-BX-07-DR-A-1107-P, 446-KCA-BX,XX-DR-A-2100-P, 446-KCA-BX-XX-DR-A-2101-P, 446-KCA-BX-XX-DR-A-3100-P, 446-KCA-BX-XX-DR-A-3101-P, 446-KCA-BX-XX-DR-A-3102-P, 446-KCA-BX-XX-DR-A-4001-P, 446-KCA-BX-XX-DR-A-4002-P, 446-KCA-BX-XX-DR-A-4101-P, 446-KCA-CX-00-DR-A-1100-P, 446-KCA-CX-01-DR-A-1101-P, 446-KCA-CX-02-DR-A-1102-P, 446-KCA-CX-03-DR-A-1103-P, 446-KCA-CX-04-DR-A-1104-P, 446-KCA-CX-05-DR-A-1105-P, 446-KCA-CX-06-DR-A-1106-P Rev 01, 446-KCA-CX-07-DR-A-1107-P Rev 01, 446-KCA-CX-XX-DR-A-2100-P Rev 01, 446-

KCA-CX-XX-DR-A-2101-P, 446-KCA-CX-XX-DR-A-3100-P Rev 01, 446-KCA-CX-XX-DR-A-3101-P Rev 01, 446-KCA-CX-XX-DR-A-3102-P Rev 01, 446-KCA-CX-XX-DR-A-4001-P Rev 01, 446-LAN-00-XX-DR-L-1001-D Rev P3, C130822-02-01-RevB

Supporting Documents:

Landscape and Public Realm Strategy Issue R05 (02/03/2020), Transport Assessment Revision 4 (March 2020), Transport Addendum Note Revision 3 (October 2020), Framework Travel Revision 3 (February 2020), Noise and Vibration Assessment A3647/N/002 (dated 21.02.2020), Statement of Community Involvement, Historic Environment Assessment Issue 3 (25/02/2020), Energy Assessment Rev T4 (24/02/2020), Overheating Report Rev T5 (24.02.2020), Sustainability Statement (March 2020), Air Quality Assessment A3647/AQ/006 (02.03.2020), Daylight and Sunlight: Impact on Neighbouring Properties report and appendices (2 March 2020), Internal Daylight and Sunlight and Overshadowing Report Rev A (25.02.20), Solar Glare Assessment (21 February 2020), Pedestrian Level Wind Microclimate Assessment (February 26th 2020), Arboricultural Impact Assessment Rev A (September 2020), Construction Environmental Management Plan (02/03/2020), Ground Investigation Report (February 2020), Townscape and Visual Appraisal (February 2020), Planning Statement (March 2020), Heritage Statement Issue 6 (27/02/2020), Design and Access Statement Rev 3 (03/03/2020), Flood Risk and Sustainable Drainage Report draft 3 (February 2020), Ecological Impact Assessment Rev B (25/02/2020),

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

3. Constriction Logistics Plan

No development shall take place until a construction logistics plan has been submitted to, and agreed in writing by the Local Planning Authority. The plan shall detail the arrangements for:

- a) the parking of vehicles of site operatives and visitors;
- b) loading and unloading of plant and materials;
- c) storage of plant and materials used in construction the development;
- d) the erection and maintenance of security hoardings including decorative displays and facilities for public viewing;
- e) wheel washing facilities;
- f) a scheme for recycling/disposing of waste resulting from demolition and construction works;
- g) measures for the control and reduction of dust; and
- h) measures for the control and reduction of noise and vibration.

The construction of the development shall be carried out in accordance with the plan so agreed.

REASON: To ensure that measures are put in place to manage and reduce noise and vibration impacts during demolition and construction and to safeguard the amenity of neighbouring occupiers

4. Construction Environmental Management Plan

No site works or development shall take place until a construction environmental management plan (CEPM) has been submitted to, and agreed in writing by the Local Planning Authority. The CEMP shall detail the measures to reduce the environmental impacts during the construction phase and set out the arrangements for the handling of excavation, and construction waste arising from the development. The development shall be carried out in accordance with the approved plan

REASON: To ensure measures are in place to reduce environmental impacts during construction and ensure that waste management on the site is addressed from construction stage

5. Levels

No site works or development shall commence until details of the levels of the building(s), road(s) and footpath(s) in relation to the adjoining land and highway(s), and any other changes proposed in the level of the site, has first been submitted to and agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with the details so agreed.

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

6. Surface and Foul Water Disposal

No development shall take place, until works for the disposal of surface and foul water have been submitted to, and approved in writing by, the local planning authority. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter. The applicant should contact the Harrow Infrastructure Team at the earliest opportunity.

REASON: To ensure that the development achieves an appropriate greenfield run-off rate in this critical drainage area and to ensure that sustainable urban drainage measures are exploited

7. Surface Water Attenuation

No development shall take place, until surface water attenuation and storage works have been submitted to, and approved in writing by, the local planning authority. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter. The applicant should contact the Harrow Infrastructure Team at the earliest opportunity.

REASON: To ensure that the development achieves an appropriate greenfield run-off rate in this critical drainage area and to ensure that sustainable urban drainage measures are exploited

8. Permeable Paving and Drainage Strategy

- a) Notwithstanding the approved details and prior to the commencement of development, full details of the permeable paving shall be submitted to and approved in writing by the Local Planning Authority. Details thereby approved shall be retained thereafter.
- b) Details relating to the long-term maintenance and management of the on-site drainage shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of drainage works.

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

9. Arboriculture Method Statement

No site works or development shall commence until a site-specific tree protection plan and Arboricultural method statement (to BS5837) based on the draft Arboricultural Impact Assessment has been submitted to and approved in writing by the Local Planning Authority. Details shall include:

- a) Specification and finalised location of tree protection barriers, indicated on a plan
- b) Details of demolition & construction within the RPA of retained trees - specifically relation to construction of wall within RPA of T4
- c) Details of any facilitation pruning required for access, working space etc
- d) Details of all areas of new hard-standing to be constructed using no-dig methodologies. Where no-dig is proposed, cross sections should be provided to show that raised levels can be accommodated in finished levels across site
- e) Details of site access, material / storage areas, contractor parking, site hut etc
- f) tree protection monitoring and supervision, including clerk of works schedule that specifies arboricultural supervision at appropriate stages of the development process

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

REASON: to safeguard the protected trees adjacent to the application site during construction

10. Construction Ecological Management Plan

No site works or development shall commence until a Construction Ecological Management Plan (CEcMP) shall be submitted to, and approved in writing by the local planning authority. The CEcMP shall also include details of how the invasive plants from the development site shall be eradicated. The proposed development shall be carried out in accordance with the details approved.

REASON: To protect biodiversity and access to nature, including the protection of designated wildlife sites and the function of green corridors

11. Biodiversity Enhancement and Management Plan (BEMP)

The development hereby approved shall not commence until a Biodiversity Enhancement and Management Plan (BEMP) has been submitted to and approved in writing by the local planning authority. The BEMP shall be required to provide full details of:

- provision of biodiverse, blue-green roofs of varied topography, equipped with a mix of shelter elements to suit a broad spectrum of invertebrate groups; full build-up details and proposed plant species
- installation of an appropriate boundary to provide a better connection between the development site and adjoining SINC at both west and north boundaries taking into consideration TfL operational requirements on the western boundary.
- treatment of the edge of the site so that hard surfaces end no less than 300-500 mm or more from the edge of the SINC
- number, type and placement of wildlife shelters for bat and bird (including e.g. house sparrow, tits, robins, swift, starling, kestrel) species and a range of invertebrate species wildlife to be incorporated within the fabric of the buildings and other structures, including solid and green walls
- biodiversity value of ground level soft landscaping elements
- lighting and glazing strategy intended to minimise the impacts of both internal and external illumination on nocturnal and crepuscular wildlife• programme of works to be undertaken during the construction and establishment phases
- the first five years of management following establishment and subsequent plan updates
- arrangements for management plan implementation, oversight, update and monitoring

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

REASON: To enhance green infrastructure and to provide gain for biodiversity

12. Air Source Heat Pump and Revised Energy Strategy

- a) The development hereby approved shall not commence until detailed specification and design of the Air Source Heat Pump (ASHP) and an updated energy strategy which takes into account the detailed specification and design of the ASHP has first been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the details so agreed and shall be retained thereafter.
- b) Within 3 months (or other such period agreed in writing by the local planning authority) of the final completion of the development a post construction assessment shall be undertaken demonstrating compliance with the approved Energy Statement; which thereafter shall be submitted to the local planning authority for written approval.

c)

REASON: To ensure the delivery of a sustainable development

13. Noise and Ventilation

The development hereby approved shall not commence until a detailed sound insulation scheme for protecting the proposed residential development (including balconies) from rail and other noise shall be submitted to and approved in writing by the Local Planning Authority. The submitted details shall include a ventilation strategy which would be a suitable alternative to keeping windows open and would meet the target noise levels required. Thereafter, the approved mitigation measures shall be fully implemented in accordance with the approved details and shall be retained and maintained in good working order for so long as the buildings remains in use.

REASON: To ensure that potential adverse noise impacts to residential premises within the development are mitigated

14. Contamination 1

No development shall take place until a scheme ('the second scheme') for the management of contamination risk at the site has first been submitted to, and agreed in writing by, the local planning authority. The second scheme shall include the following:

- a) details of a site investigation to provide information for a detailed assessment of the risks to all receptors that may be affected, including those off site;
- b) the results of the site investigation and an options appraisal and remediation strategy giving full details of remediation measures and how they are to be undertaken; and
- c) 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 are complete and identifying any requirements for longer-term monitoring of pollutant leakages, maintenance and arrangements for contingency action.

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

REASON: To ensure that the development does not activate or spread potential contamination at the site and that the land is appropriately remediated for the approved uses. To ensure that measures are agreed and in place to identify and manage potential sources of contamination during the demolition and construction phases of the development, this condition is a PRE-COMMENCEMENT condition

15. Landscaping Details

Notwithstanding the details that have been submitted, the development hereby approved shall not progress beyond damp proof course level until a scheme for detailed hard and soft landscaping of the development has been submitted to and approved in writing by the Local Planning Authority. To include

a) details of the planting, hard surfacing materials, and including the external seating, street furniture, pergolas, trellis, climbing plant supports, tree pits including all underground cellular systems, drainage, growing medium, tree planting and support, rain gardens, SUDs measures..

Soft landscaping works shall include: planting plans (at a scale not less than 1:100), written specification of planting and cultivation works to be undertaken and schedules of plants, noting species, plant sizes, plant container sizes (all at time of planting) and proposed numbers / densities and an implementation programme. Planting which may provide benefits in terms of improving air quality are encouraged.

The hard surfacing details shall include samples to show the texture and colour of the materials to be used and information about their sourcing/manufacturer.

The hard and soft landscaping details shall demonstrate how they would contribute to privacy between the communal gardens and the adjacent flats.

b) Details of all furniture, specification for the proposed supports and fixings for plants, landscape structures and pergolas and climbing plant frames, including proposed material and source / manufacturer and detailed drawings of such; for all communal areas and bespoke furniture.

c) Full scale metric cross sections and elevations for all communal open amenity spaces (at a scale of not less than 1:100) including the proposed details for level changes.

d) details of boundary treatment

REASON: To ensure that the development achieves a high standard of design, layout and amenity and makes provision for hard and soft landscaping which contributes to the creation of a high quality, accessible, safe and attractive public realm

16. Secure by Design Gate Details

The development hereby permitted shall not commence until details of the security tested and certified pedestrian and vehicular gates have first been submitted to and approved in writing by the Local Planning Authority. The development shall not be occupied until the pedestrian and vehicular gates have been provided on site in accordance with the approved details.

REASON: In the interests of creating safer and more sustainable communities and to safeguard amenity by reducing the risk of crime and the fear of crime.

17. Play Space

The development hereby approved shall not commence above damp proof course level until a detailed play strategy for the site has first been submitted to and agreed by the Local Planning Authority. Such details shall comprise: a specification of all play equipment to be installed (including provision for children with disabilities and special sensory needs where possible); a specification of the surface treatment within the play areas; and a detailed assessment on the quantum of play space proposed. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development makes appropriate provision for play and informal recreation

18. Materials

Notwithstanding the details shown on the approved drawings, the development hereby approved shall not progress beyond damp proof course level until samples of the materials (or appropriate specification) to be used in the construction of the external surfaces noted below have been submitted to, and agreed in writing by, the local planning authority:

- a) facing materials for the building, including brickwork bond details;
- b) windows/ doors;
- c) balcony and balustrade detail details

The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To safeguard the appearance of the locality and to ensure a satisfactory form of development.

19. Materials 2

The development hereby approved shall not progress beyond damp proof course level until a x 1:1 sample mock-up of a window opening, surrounding brickwork and proposed brick detail to be used in the external faces of the buildings have been erected on site (or at such other location(s) as may be agreed in writing by the local planning authority) and agreed in writing by, the local planning authority. The development shall be carried out in accordance with the details, samples and drawings so agreed and shall be retained as such thereafter.

REASON: To ensure a satisfactory form of development

20. Window and Door Reveals

Notwithstanding the details shown on the approved drawings, the construction of the buildings hereby approved shall not progress above damp proof course level until there has been submitted to and approved in writing by the Local Planning Authority detailed sections at metric scale 1:20 through all external reveals of the windows and doors on each of the elevations. In the event that the depth of the reveals is not shown to be sufficient, a modification showing deeper reveals shall be submitted for approval in writing. The development shall be completed in accordance with the approved details and shall thereafter be retained.

REASON: To ensure a high quality finish to the external elevations of the building

21. Wind Mitigation

The development hereby permitted shall not progress above damp proof course level until details of measures to reduce the wind exposure to the private balconies as required by the Pedestrian Level Microclimate Assessment have first been submitted and approved in writing by the Local Planning Authority. The development shall be completed in accordance with the approved details and shall be retained thereafter.

REASON: To ensure a high quality of amenity for the future occupiers

22. Communal facilities for television reception

Prior to the first occupation of the development, details of a strategy for the provision of communal facilities for television reception (eg. aerials, dishes and other such equipment) shall be submitted to the Local Planning Authority in writing to be agreed. Such details shall include the specific size and location of all equipment. The approved details shall be implemented prior to the first occupation of the relevant phase and shall be retained thereafter. No other television reception equipment shall be introduced onto the walls or the roof of the building without the prior written approval of the Local Planning Authority

REASON: To ensure that any telecommunications apparatus and other plant or equipment that is required on the exterior of the buildings preserves the high quality design of the buildings and spaces

23. Lighting Strategy

Prior to installation of lighting, details of the lighting of all public realm and all exterior communal areas (including buildings) within the site has first been submitted to and agreed in writing by the Local Planning Authority. The details shall include details of the intensity of light emissions (including the surface area to be illuminated), light spillage, specification and detailed drawings of the proposed lighting columns and fittings and any measures for mitigating the effects of light pollution. The exterior lighting would need to take account of any

biodiversity recommendations or requirements, such as bat friendly lighting. The units shall not be occupied until the lighting has been provided on site in accordance with the approved plans and the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development incorporates lighting that contributes to Secured by Design principles, achieves a high standard of residential quality in accordance and protects biodiversity.

24. Landscape Management and Maintenance

The development hereby approved shall not be occupied until a scheme for the on-going management, management programme of works and maintenance of all the hard and soft landscaping within the development, to include a Landscape Management Plan, including long term design objectives, management responsibilities and landscape maintenance schedules for all landscape areas, has been submitted to, and approved in writing by, the Local Planning Authority. The Landscape Management Plan and Landscape Maintenance Plan shall be carried out in a timely manner as approved and shall be retained as such thereafter.

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes (i) to the creation of a high quality, accessible, safe and attractive public realm and (ii) to the enhancement, creation and management of biodiversity

25. Secure by Design

Prior to the first occupation of the development, evidence of Secured by Design Certification shall be submitted to the Local Planning Authority to be agreed in writing, or justification shall be submitted where the accreditation requirements cannot be met. Secure by design measures shall be implemented and the development shall be retained in accordance with the approved details.

REASON: In the interests of creating safer and more sustainable communities and to safeguard amenity by reducing the risk of crime and the fear of crime

26. Delivery and Servicing Plan

The development hereby approved shall not be first occupied until a Delivery and Servicing Plan has first been submitted to and agreed in writing by the Local Planning Authority. The revised Delivery and Servicing Plan shall include full details of the onsite Refuse Management Strategy. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter. All deliveries and servicing associated with the development shall be carried out only in accordance with the approved details.

REASON: To ensure that the transport network impact of deliveries associated with the development are managed

27. Parking Management Plan

The development hereby permitted shall not be occupied until a detailed parking management plan has been submitted to, and agreed in writing by the local planning authority. The plan shall make provision for:

- a) details of how the parking spaces would be managed;
- b) identify the electric vehicle charging point spaces that are to be provided as 'active' spaces and those as 'passive' spaces;
- c) detail the relevant blue-badge parking spaces within the car park;
- d) detail the provision of cycle parking for residential and non-residential users, including visitors to the development, which shall include the type of cycle stands proposed (including specification);

REASON: To ensure that the development provides sufficient blue badge parking, cycle, motorcycle and electric vehicle charging points.

28. Landscape Implementation

All hard landscaping shall be carried out prior to the occupation of any part of the development or in accordance with a programme that has been submitted to the Local Planning Authority in writing to be agreed. All soft landscaping works including planting, seeding or turfing comprised in the approved scheme of landscaping shall be carried out no later than the first planting and seeding season following the final occupation of the residential parts of the buildings, or the completion of the development, whichever is the sooner. Any existing or new trees or shrubs which, within a period of 5 years from the completion of the development, die, are removed, or become seriously damaged, diseased or defective, shall be replaced in the next planting season, with others of a similar size and species, unless the local authority agrees any variation in writing.

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes (i) to the creation of a high quality, accessible, safe and attractive public realm and (ii) to the enhancement, creation and management of biodiversity with the Heart of Harrow

29. Arboricultural site supervision

Prior to commencement of work at the site, the LPA will be provided with clear and obvious proof that the details of the AMS have been adhered to, either through separate reports or single larger report, summarising details of each clerk of works visit and including (where relevant) photographic evidence of adherence to the AMS and TPP. This condition may only be discharged on completion of the development, subject to satisfactory evidence of compliance through contemporaneous monitoring of tree protection throughout construction, by the appointed specialist.

REASON: to safeguard the protected trees adjacent to the application site during construction

30. Refuse Storage

The refuse bins shall be stored at all times, other than on collection days, in the designated refuse storage area, as shown on the approved drawing plans.

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

31. Accessible and Wheelchair Dwellings

A minimum of 10% of the units shall be built in accordance with Building Regulation standard M4 (3) 'Wheelchair User Dwellings'. All other residential units in this development, as detailed in the submitted and approved drawings, shall be built to Building Regulation Standard M4(2) 'Accessible and adaptable dwellings'. The development shall be thereafter retained to those standards.

REASON: To ensure provision of 'Wheelchair and Accessible and adaptable' housing

32. Communications

Notwithstanding the provisions of Part 16 (Communications) to Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015, or any order revoking and replacing that Order with or without modification, no development that would otherwise be permitted by that part of the Order (or the equivalent provisions of any replacement Order) shall be carried out without planning permission having first been obtained by the local planning authority.

REASON: To ensure that the development preserves the highest standards of architecture and materials.

33. Appearance of Buildings

Other than those shown on the approved drawings, no soil stacks, soil vent pipes, flues, ductwork or any other pipework shall be fixed to the elevations of the building hereby approved.

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

34. Contamination 2

If, during development, contamination not previously identified is found to be present at the site then no further construction of that phase of the development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unanticipated contamination is to be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

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

35. Contamination 3

Unless otherwise agreed in writing by the Local Planning Authority, prior to the first occupation of any building within each relevant phase, site derived soils and imported soils within each phase shall be tested for contamination (to include but not limited to asbestos). All soils used for gardens and/or landscaping purposes shall be clean and free of contamination.

REASON: To safeguard the amenities of the future occupiers

Informatives

1. Planning Policies

The following policies are relevant to this decision:

The London Plan (2016): 2.8, 3.3, 3.5 3.4, 3.5, 3.6, 3.8, 3.10, 3.11, 3.13, 5.1, 5.2, 5.3, 5.4, 5.5, 5.6, 5.7, 5.11, 5.12, 5.13, 5.15, 5.18, 5.21, 6.1, 6.3, 6.9, 6.10, 6.11, 6.13 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.8, 7.14, 7.15, 7.19, 7.21, 8.2

The Publication London Plan (2020): GG2, GG4, GG6, D1, D2, D3, D4, D5, D6, D7, D8, D14, H1, H4, H5, H6, H10, HC1, G6, G7, G8, SI1, SI2, SI3, SI4, SI5, SI12, SI13, T1, T2, T3, T4, T5, T6, T6.1, T7, DF11

Harrow Core Strategy (2012): CS1A, CS1B, CS1D, CS1E, CS1H, CS1I, CS1J, CS1K, CS1R, CS1U, CS1W, CS1X, CS1Z, CS8I

Development Management Policies DPD (2013): DM1, DM2, DM7, DM9, DM10, DM12, DM13, DM14, DM15, DM20, DM21, DM22, DM24, DM27, DM28, DM42, DM43, DM44, DM45, DM50

Supplementary Planning Document: Residential Design Guide (2010)

Site Allocations Development Plan Document (2013)

Planning Obligations and Affordable Housing Supplementary Planning Document (2013)

Stanmore and Edgware Conservation Area Supplementary Planning Document (2013)

Mayor of London's Housing Supplementary Planning Guidance (2016)

Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance (2017)

2. Considerate Contractor Code of Practice

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

3. The Party Wall etc. Act 1996

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

1. work on an existing wall shared with another property;
2. building on the boundary with a neighbouring property;
3. excavating near a neighbouring building,

and that work falls within the scope of the Act. Procedures under this Act are quite separate from the need for planning permission or building regulations approval. "The Party Wall etc. Act 1996: Explanatory booklet" is available free of charge from: Communities and Local Government Publications, PO Box 236 Wetherby, LS23 7NB. Please quote Product code: 02 BR 00862 when ordering. Also available for download from the CLG website: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/133214.pdf>

Tel: 0870 1226 236, Fax: 0870 1226 237, Textphone: 0870 1207 405, E-mail: Ucommunities@twoten.comU4T

4. Mayoral Community Infrastructure Levy (provisional)

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

The Provisional Mayoral CIL liability for the application, based on the Mayoral CIL levy rate for Harrow of £60/sqm is £51,000. This amount includes indexation which is 323/323. The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).

You are advised to visit the [planningportal](https://ecab.planningportal.co.uk/uploads/1app/forms/form_1_assumption_of_liability.pdf) website where you can download the appropriate document templates. Please complete and return the Assumption of Liability Form 1 and CIL Additional Information Form 0.

https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf
If you have a Commencement Date please also complete CIL Form 6:
https://ecab.planningportal.co.uk/uploads/1app/forms/form_6_commencement_notice.pdf

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

6 Pre-application engagement

Statement under Article 35(2) of The Town and Country Planning (Development Management Procedure) (England) Order 2015. This decision has been reached in accordance with paragraphs 39-46 of The National Planning Policy Framework. Pre-application advice was sought and provided and the submitted application was in accordance with that advice

7. Thames Water

The applicant is advised to contact Thames Water regarding confirmation of capacity within their system to receive the proposed discharge from the new development

8. Sustainable Urban Drainage

The applicant is advised that surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface

water management (SUDS). SUDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SUDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SUDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity. Where the intention is to use soak ways they should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365. Support for the SUDS approach to managing surface water run-off is set out in the National Planning Policy Framework (NPPF) and its accompanying technical guidance, as well as the London Plan. Specifically, the NPPF (2012) gives priority to the use of sustainable drainage systems in the management of residual flood risk and the technical guidance confirms that the use of such systems is a policy aim in all flood zones. Policy 5.13 of the London Plan (2012) requires development to utilise sustainable drainage systems unless there are practical reasons for not doing so. Sustainable drainage systems cover the whole range of sustainable approaches to surface drainage management. They are designed to control surface water run-off close to where it falls and mimic natural drainage as closely as possible. Therefore, almost any development should be able to include a sustainable drainage scheme based on these principles. The applicant can contact Harrow Drainage Section for further information

9. Compliance with conditions

Compliance with Planning Conditions Requiring Submission and Approval of Details Before Development Commences

- You will be in breach of planning permission if you start development without complying with a condition requiring you to do something before you start. For example, that a scheme or details of the development must first be approved by the Local Planning Authority.
- Carrying out works in breach of such a condition will not satisfy the requirement to commence the development within the time permitted.
- Beginning development in breach of a planning condition will invalidate your planning permission.
- If you require confirmation as to whether the works you have carried out are acceptable, then you should apply to the Local Planning Authority for a certificate of lawfulness.

10. Highways Interference

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

with the repair of the damage is available, at the applicants expense. Failure to report any damage could result in a charge being levied against the property.

11. Naming and Numbering

Harrow Council is responsible for the naming and numbering of new or existing streets and buildings within the borough boundaries. The council carries out these functions under the London Government Act 1963 and the London Building Acts (Amendment) Act 1939. All new developments, sub division of existing properties or changes to street names or numbers will require an application for official Street Naming and Numbering (SNN). If you do not have your development officially named/numbered, then then it will not be officially registered and new owners etc. will have difficulty registering with utility companies etc. You can apply for SNN by contacting technicalservices@harrow.gov.uk or on the following link. http://www.harrow.gov.uk/info/100011/transport_and_streets/1579/street_naming_and_numbering

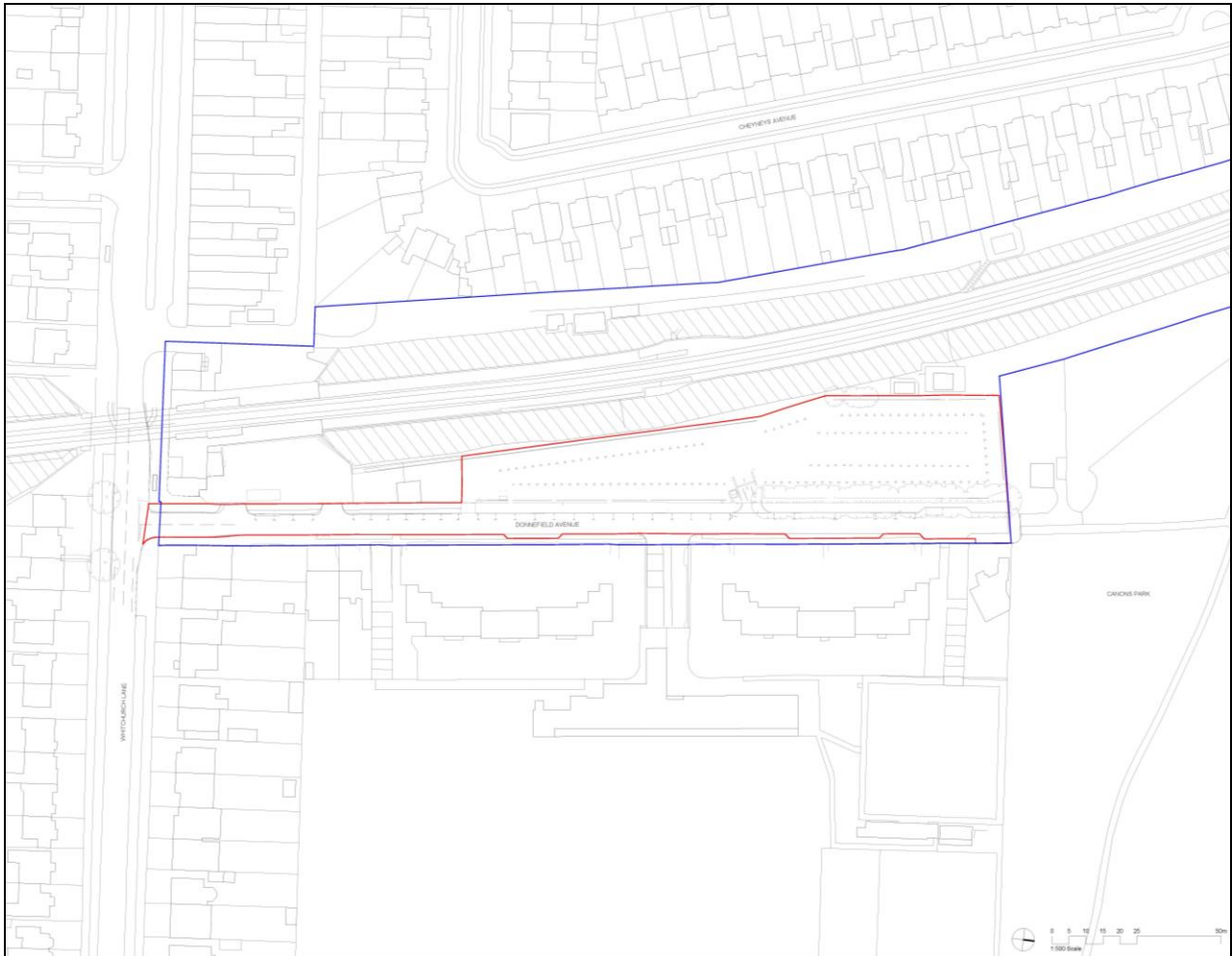
12. Thames Water

The proposed development is located within 15m of Thames Water underground assets and as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary structures <https://developers/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

CHECKED

Interim Chief Planning Officer	Orla Murphy pp. Beverley Kuchar	7.1.2021
Corporate Director	Paul Walker	7.1.2021

APPENDIX 2: SITE PLAN



APPENDIX 3: SITE PHOTOGRAPHS

(n.b – the pictures are provided solely to identify the application site and are not representative of the general car park occupancy levels)



View towards the application site from Donnefield Avenue



View of the station car park from the pedestrian footway



Existing Station Car Park Entrance



View of the station car park facing south



View towards the northern boundary of the application site



View of Canons Park Entrance from Donnefield Avenue

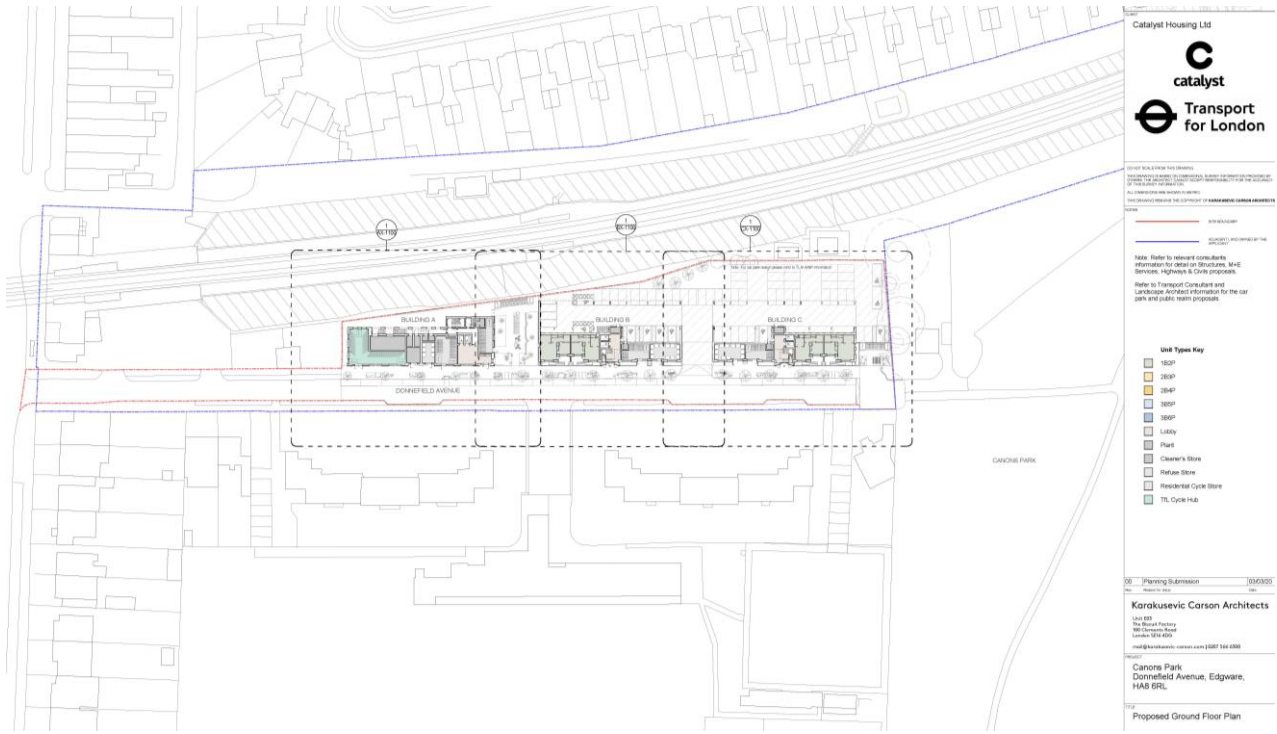


View towards application site adjacent from the Canons Park Entrance



View of application site from within Canons Park, adjacent to Wyel Lodge

APPENDIX 4: PLANS AND ELEVATIONS





Catalyst Housing Ltd
C
 catalyst
T
 Transport
 for London

01 Planning Comments 20/11/21
 02 Planning Submission 20/09/21

Karusevic Corson Architects
 Unit 888
 The Royal Arcade
 98 Chancery Road
 London EC2A 4JQ
 info@karusevic-corson.com | 0207 546 6588

Canons Park
 Donnell Avenue, Edgware,
 HA8 6RL

Proposed Sixth Floor Plan



1 Proposed Site East Elevation
1:500

2 Proposed Site West Elevation
1:500

3 Proposed Site North Elevation
1:500

4 Proposed Site South Elevation
1:500

Catalyst Housing Ltd
C
 catalyst
T
 Transport
 for London

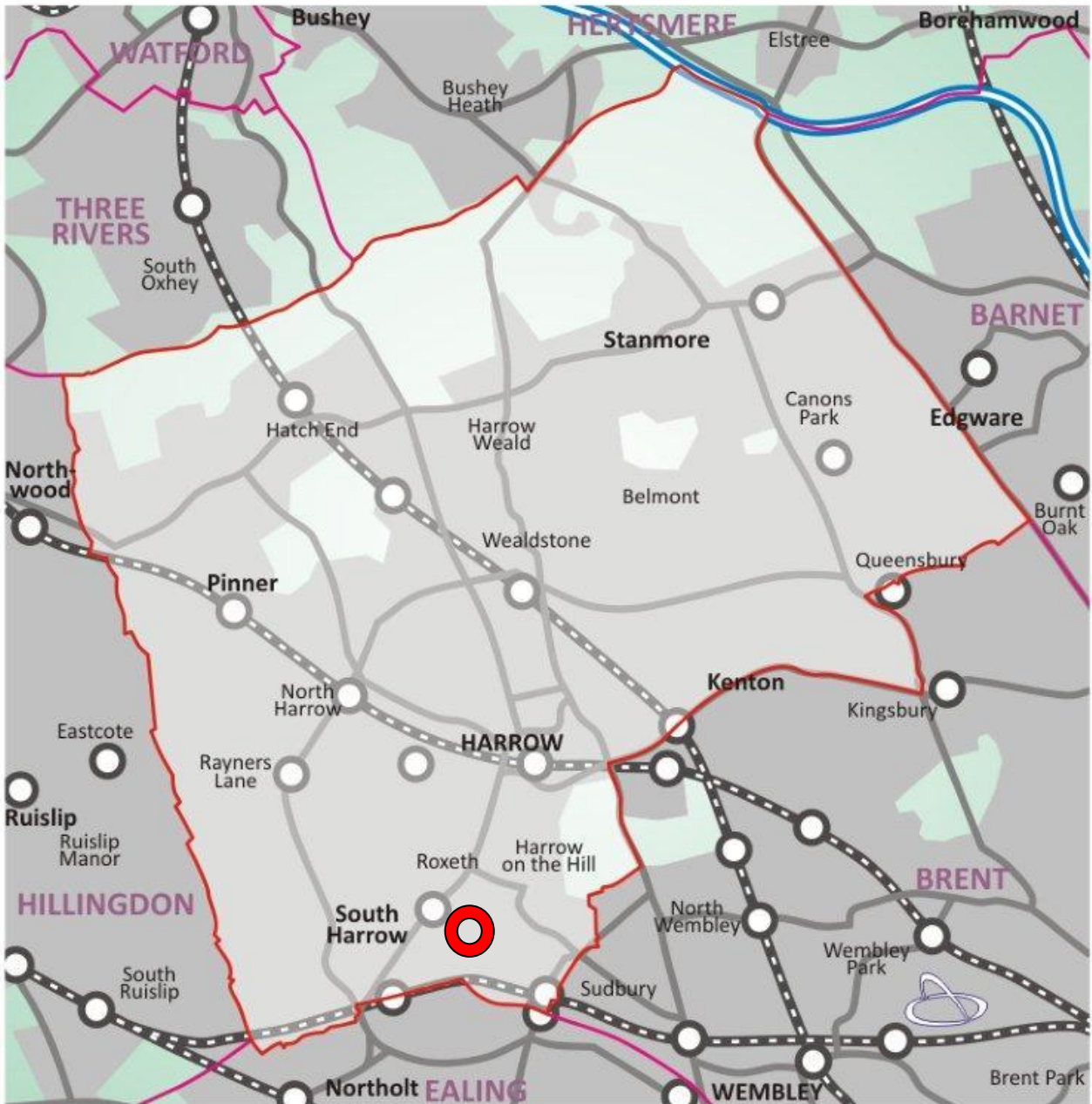
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Proposed Site Elevations

 = application site



Units 1, 1a and 2 Northolt Road Retail Park	P/2052/20
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NORTHOLT ROAD RETAIL PARK



LONDON BOROUGH OF HARROW

PLANNING COMMITTEE

20th January 2021

APPLICATION NUMBER: P/2052/20
VALIDATE DATE: 23rd JUNE 2020
LOCATION: UNITS 1, 1A AND 2 (DUNELM, SPORTS DIRECT AND HOME SENSE) NORTHOLT ROAD RETAIL PARK, 140 NORTHOLT ROAD ROXBOURNE
WARD:
POSTCODE: HA2 0EG
APPLICANT: NORTHOLT RETAIL PARK LLP
AGENT: MR SUNNY DESAI
CASE OFFICER: SELINA HOTWANI
EXTENDED EXPIRY DATE: 20th MARCH 2021

PROPOSAL

Redevelopment of the site to provide new residential accommodation (Use Class C3) along with associated works

RECOMMENDATION A

The Planning Committee is asked to:

- 1) Agree the reasons for approval as set out in this report, and
- 2) Refer this application to the Mayor of London (the GLA) as a Stage 2 referral; and
- 3) Subject to the Mayor of London (or delegated authorised officer) advising that he is content to allow the Council to determine the case itself and does not wish to direct refusal, or to issue a direction under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application, delegate authority to the Interim Chief Planning Officer in consultation with the Director of Legal and Governance Services for the completion of the Section 106 legal agreement and other enabling development and issue of the planning permission, subject to amendments to the conditions, including the insertion or deletion of conditions as deemed fit and appropriate to the development or the amendments to the legal agreement as required. The Section 106 Agreement Heads of Terms would cover the following matters:
 1. **Affordable Housing**
 - Provision of 39 affordable homes: 13 shared ownership (inclusive of discount market sales units) and 26 affordable rent

- 10% of affordable rent accommodation to be constructed and ready for occupation as wheelchair standard homes.
 - Early stage review
 - Late stage review
- 2. Carbon Offset**
- Payment of a total financial contribution of £237,559 towards carbon offset. Payable upon commencement of each phase on a pro rata basis.
 - Provision of certification of actual/ as-built carbon emission achieved on site and payment of any shortfall in carbon reductions calculated at a rate of £60 per tonne of carbon to be offset per year, over a 30 year period.
 - Provision of commitment the development will be designed to enable post construction monitoring and that the information set out in the 'be seen' guidance is submitted to the GLA's portal at the appropriate reporting stages.
- 3. Energy Centre**
- Provision of a safeguarding route to a connection to any future wider District Heat Network.
- 4. Highways and Parking**
- A revised Residential Travel Plan to be submitted to the Council prior to the first occupation of the building. A travel plan bond (to be agreed with the Council) will be required to secure the implementation of all measures specified in the revised Travel Plan. The developer to ensure the effective implementation, monitoring and management of the travel plan for the site. Appointment of Travel Plan Coordinator. Travel Plan monitoring fee of £5,000.
 - A contribution for further parking surveys (£10,000) to be carried out prior to occupation and post occupation of the 100th flat and a commitment to funding the study and implementation of CPZ measures should specific interventions be identified. The financial contribution shall be capped at £50,000.
 - Provision of a car club space.
 - The developer to enter into a Section 278 agreement to facilitate alterations to the service road on the southern access of the development site, improved lighting to the footway link to Stanley Road and implementation of traffic calming measures including speed cushions.
- 5. Employment and Training Plan**
- Payment of local Employment Contribution to the Council (amount TBC) upon commencement of development and to be used towards employment and training initiatives within the Council's administrative area.
 - Submission of an employment, training and recruitment plan to the Council for its approval

- S106 agreement will include penalty clauses for non-compliance with the above. Non-compliance is failure to deliver the obligations in the section 106 Agreement, irrespective of whether
 1. the Agreement states that it will discharge the obligation
 2. the Developer has paid the council (Xcite) to employ a training and employment co-ordinator and beneficiary funds to discharge the obligations, but the developer's contractors fail to work with Xcite to provide skill, apprenticeship and employment opportunities. HB Law has been working on relevant clauses.
- A minimum of 15% of spend during the construction of the development is with suppliers in the council's administrative area.

6. Legal Costs and Monitoring Fee

- Payment of section 106 monitoring fee upon completion of section 106 agreement (amount TBC)
- Payment of all reasonable legal fees upon completion of section 106 agreement

RECOMMENDATION B

That if the Section 106 Agreement is not completed by **20 March 2021** or as such extended period as may be agreed by the Interim Chief Planning Officer, then it is recommended to delegate the decision to REFUSE planning permission to the Interim Chief Planning Officer on the grounds that:

The proposed development, in the absence of a Legal Agreement to provide appropriate improvements, benefits and monitoring that directly relate to the development, would fail to adequately mitigate the impact of the development on the wider area and provide for necessary social, environmental and physical infrastructural improvements arising directly from the development, contrary to the National Planning Policy Framework (2019), policies 3.11, 3.13, 5.2, 6.3, 7.4, 7.5 and 7.6 of The London Plan (2016), Core Strategy (2012) policy CS1 and policies DM1, DM2 DM42, DM43 and DM50 of the Harrow Development Management Policies Local Plan and the Supplementary Planning Document: Planning Obligations (2013).

REASON FOR THE RECOMMENDATIONS

The redevelopment of the site would enhance the urban environment in terms of material presence, attractive streetscape, good routes and access and would make a positive contribution to the local area, in terms of quality and character and delivering new public spaces to support the wider masterplan and community. The massing and scale proposed would appropriately relate to the wider masterplan site and would permit full optimisation of this previously developed land to bring forward much needed housing which would positively add to the Council's housing delivery targets. The proposal would secure the provision of affordable housing at a level that meets the minimum affordable housing target set out in the development plan.

The layout and orientation of the buildings and separation distance to neighbouring properties is considered to be satisfactory to protect the amenities of the neighbouring

occupiers and the development would contribute towards the strategic objectives of reducing the carbon emissions of the borough.

The decision to grant planning permission has been taken having regard to the National Planning Policy Framework (2019), the policies of The London Plan (2016), The Publication London Plan (2020), Harrow's Core Strategy (2012) and the policies of the Harrow Development Management Policies Local Plan (2013), as well as to all relevant material considerations including the responses to consultation.

INFORMATION

This application is reported to Planning Committee as it is a Major Development and therefore falls outside Schedule 1 of the Scheme of Delegation.

Statutory Return Type:	Large scale major development
Council Interest:	None
GLA Community	£998,880
Infrastructure Levy (CIL)	
Contribution (provisional):	£2,730,604.96

HUMAN RIGHTS ACT

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

EQUALITIES

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

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

S17 Crime & Disorder Act

Policies 7.3.B and 7.13.B of The London Plan and Policy DM1 of the Development Management Policies Local Plan require all new developments to have regard to safety and the measures to reduce crime in the design of development proposal. It is considered that the development does not adversely affect crime risk.

Planning Application Fact Sheet

The Site	
Address	Units 1, 1a and 2 Northolt Road Retail Park, 140 Northolt Road, HA2 0EG
Applicant	Northolt Retail Park LLP
Ward	Roxbourne
Local Plan allocation	N/A
Conservation Area	N/A
Listed Building	N/A
Setting of Listed Building	N/A
Building of Local Interest	N/A
Tree Preservation Order	N/A
Other	N/A

Housing		
Total Unit Numbers	191	
Density	PTAL	4
	London Plan	700-1100 hr/ha
	Proposed Density	499 hr/ha
Dwelling Mix	Studio (no. / %)	0
	1 bed (no. / %)	73 (41%)
	2 bed (no. / %)	76 (43%)
	3 bed (no. / %)	25 (14%)
	4 bed (no. / %)	4 (2%)
	Overall % of Affordable Housing	25% (by habitable room) 20% (units)
	Affordable Rent (no. / %)	26 (73%)
	Intermediate (no. / %)	13 (27%)
	Private (no. / %)	152 (80%)
	Commuted Sum	N/A
	Comply with London Housing SPG?	Yes
Comply with M4(2) of Building Regulations?	Yes	

Non-residential Uses		
Existing Use(s)	Existing Use / Operator	N/A
	Existing Use Class(es) sqm	A1 (Retail)
Proposed Use(s)	Proposed Use / Operator	Use Class C3
	Proposed Use Class(es) sqm	C3 – 16,648 sqm
Employment	Existing number of jobs	33
	Proposed number of jobs	Circa 500 over a 3 year period

Transportation		
Car parking	No. Existing Car Parking spaces	386 (across whole retail park)
	No. Proposed Car Parking spaces	67 (0.35 spaces per unit)
	Proposed Parking Ratio	0.35 spaces: 1 unit
Cycle Parking	No. Existing Cycle Parking spaces	N/A
	No. Proposed Cycle Parking spaces	299; 5 visitor spaces
Public Transport	PTAL Rating	4
	Closest Rail Station / Distance (m)	South Harrow Station
	Bus Routes	395, 140, 116, H9 and H10
Parking Controls	Controlled Parking Zone	Stanley Road Northolt Road
	CPZ Hours	Stanley Road: Mon-Sat 10am -9pm Northolt Road: Mon-Sat (10-11 and 14:00-15:00)
	Other on-street controls	Adopted section of site access single yellow lines (Mon-Sat 8am-6.30pm) Beyond adopted section, private parking enforcement is in place Single yellow lines both sides of Northolt Road (Mon-Sat, 07:00-19:00)
Refuse/Recycling Collection	Summary of proposed refuse/recycling strategy	Each Core will have its own bin store with separate bins for the collection of general waste and recycling. There are 4 refuse collection points.

Sustainability / Energy	
BREEAM Rating	N/A
Development complies with Part L 2013?	Yes – 43% reduction

1.0 SITE DESCRIPTION

- 1.1 The application site is located on the north-west corner of Northolt Road Retail Park and is 1.03 hectares in size. The site comprises two large units that contain three retail stores: Sports Direct, Home Sense and Dunelm. The remainder of the application site is a strip of surface car parking and access on the north eastern and south eastern side of the site as well as part of the delivery and servicing area and access on the western side.
- 1.2 The site is bound to the west by a designated Industrial use area known as the Brember Road Industrial Estate comprising a mix of industrial and retail units. To the north is the Grange Farm Estate which has extant permission for a comprehensive redevelopment for between three and eight storey residential buildings with community uses under planning permission P/3524/16 dated 29/03/2019. A Waitrose Supermarket and associated car parking is also within the Northolt Road Retail Park and located to the south and east. The site is accessed via a roundabout off Northolt Road and retains a right of access over the retail park's unadopted access roads to the south which is the main vehicular access.
- 1.3 The site does not contain any designated heritage assets and is not located within a conservation area. The Mount Park Estate Conservation Area is located approximately 350m away, the site is approximately 300m from the Roxeth Hill Conservation Area and approximately 260m from Grade II listed 29-37 Horn Buckle Close. The site is located within RAF Northolt's conical protected surfaces and is in a critical drainage area. There is an existing water culvert that runs through part of the site primarily under part of the southern and eastern accesses.
- 1.4 The site has a Public Transport Accessibility Level Rating of 4 which is considered Good. The site is also served by a number of bus routes and located less than 10 minutes away (by foot) from South Harrow Town Centre and South Harrow Underground Station.

2.0 PROPOSAL

- 2.1 The proposed development seeks full planning permission for the demolition of existing retail units: Sports Direct, Dunelm and Home Sense and the redevelopment of the site to provide three buildings ranging from 4-6 storeys for the provision of 191 residential units, associated landscaping, access, parking, refuse and cycle parking, associated works.
- 2.2 67 standard parking spaces are proposed within the podium parking area, along with a further 13 accessible parking spaces and 2 motorcycle spaces. 528 long

stay cycle spaces are proposed along with 9 short stay cycle spaces. In terms of non-residential cycle parking spaces, 1 long stay space and 4 short stay spaces are proposed.

2.3 A breakdown of the proposed development by plot is listed below.

Plot 01 (Linear Block)

2.4 This plot would consist of 112 residential apartments, of which 1 would be Intermediate housing. 67 units are proposed to be 1 bed, 31 units would be 2 bed (4 person) and there would be 14 x 3 bed units (all being 5 person). 22 of these units would be wheelchair accessible units.

2.5 The buildings would be located north west of the site and would range in height from 4 to 6 storeys arranged in three blocks each with their own communal residential entrance. Car parking is accessed south of the block below a podium via the main vehicular access to the site along the existing service and delivery road. To the rear of these blocks are open podium-level courtyards, private gardens with play facilities.

2.6 Two cycle parking areas are proposed within Plot 1. 72 spaces are centrally located comprising 27 double stacker long stay spaces and 9 outdoor short stay spaces (7 Sheffield stands; 2 wide Sheffield stands) and a further 136 spaces are located on the northern area comprising 48 double stacker long stay spaces and 20 short stay (14 Sheffield stands; 6 wide space Sheffield stands). Four motorcycle spaces are also housed within the podium car park. Each of the three blocks have a dedicated refuse store.

Plot 02 (Pavilion Block)

2.7 Plot 02 would consist of 2 stepped blocks, ranging from 5 and 6 storeys in height centrally located between Plots 01 and 03 within the site. This plot would comprise 42 residential units of which 1 unit would be for Intermediate housing (and wheelchair accessible). 5 units are proposed to be 1 bed (1 person), 10 units would be 1 bed (2 person), 22 units would be 2 bed (4 person) and 4 units would be 3 bed (5 person).

2.8 A single dedicated refuse store is located adjacent to the main communal entrance of the building. An amenity area is located south of the building incorporating play space. All ground floor units would incorporate separate entrances and private amenity spaces. A dedicated cycle store is also located at ground floor level.

Plot 03 (Mews Block)

2.9 This plot would comprise 37 residential apartments, all of which would be affordable housing. This plot comprises a linear block located on the northern boundary of the site comprising 4 storeys on the eastern side and would step up to 6 storeys westwards. 9 units would be 1 bed (2 person), 17 units would be 2 bed (4 person) and 10 units would be 3 bed (5 person). The plot would include 2 wheelchair accessible units. This plot varies in typology in that it would provide 3

bedroom maisonettes to the majority of ground and first floor. These would benefit from private courtyard gardens from the street and a terrace to the rear at first floor. The upper levels would comprise traditional flatted units with a series of inset and infill balconies.

- 2.10 Either side of this block are links to the Grange Farm development to the north. The Mews Block will be car free only allowing Emergency Access, this would be enforced via a bollard system.

Public Realm

- 2.11 The site would be accessed via two points. To the east, the existing access to the car park of the retail park would be altered so that there is a single entry and exit point (off the roundabout) thereby removing separate access to the adjacent petrol station. This would result in a reconfiguration of the Waitrose car park to create an entry and exit point from within the car park adjacent to the proposed Mews Street (Plot 03). For visitors and future occupiers of the proposed development, this access would be solely for pedestrians, cyclists and emergency vehicles.
- 2.12 The main vehicular access, cycle and pedestrian entrance to the site would be via the existing service road to the south-west. Landscape improvements and dedicated paths for cyclists and pedestrians would be incorporated. Vehicle access would be limited to the podium car park to restrict car movements within the site. Two connections to and from Grange Farm on the north and west boundaries are proposed. The northern connection would lead to an arrival space within the proposed development.
- 2.13 The site boundaries are proposed to be characterised by green vegetation comprising semi-woodland, low maintenance planting. Three main public spaces are proposed, play spaces as well as parks and garden areas, some of which are also private. A variety of boundary treatments are proposed on the boundaries fronting the car park of the retail park.

3.0 RELEVANT PLANNING HISTORY

- 3.1 A summary of the relevant planning application history is set out in the table below:

Ref no. Description	Status and date of decision
WEST/46006/93/OUT – Outline: Retail foodstore (Class A) (4,645sqm), petrol station, access and parking	Granted 28/04/1994
WEST/124/94/FUL- Retail foodstore (Class A1) (3,872sqm), petrol station, access/parking, revised retention of offices, store, car park	Granted subject to legal agreement 30/03/1995
WEST/726/95/FUL – Detached building to provide 2 units of non-food retail floorspace totaling 3,050 sqm with access and parking	Agreed subject to legal agreement, legal agreement not

	signed.
Unit 1B (Home Sense)	
WEST/324/95/FUL – Retail Foodstore Class A1 3272m ² , Petrol Filling Station, Access, Parking, Retention of Offices, Store Car Park (Revised)	Granted 28/02/1996
WEST/407/98/FUL – Detached Building To Provide Two Units of Non-Food Retail Floorspace Totalling 2978m ² (Net) With Access and Parking	Granted 19/10/2000
P/1238/04/CVA - Variation of Condition 20 of Planning Permission WEST/407/98/FUL to Permit the Sale of Sports Goods, Clothing and Footwear	Granted 09/07/2004
P/0286/08/CVA - Installation of a Mezzanine Floor (in new subdivided retail store).	Granted 19/03/2008
P/1628/08VA - Variation of condition 20 to planning permission west/407/98/ful and condition 2 of planning permission P/0286/08/CVA to allow sale of non-food comparison retail goods	Granted 27/06/2008
P/1635/08VA - Variation of condition no. 2 of planning permission P/0286/08/CVA to allow sale of non-food comparison retail goods	Granted 27/06/2008
P/4381/14 – External alterations to unit	Granted 06/01/2015
P/4375/14 – Installation of mezzanine	Granted 16/02/2015
P/4381/14 – External Alterations to unit	Granted 06/01/2015
Unit 2	
WEST/407/98/FUL – Detached building to provide 2 units of non-food retail floorspace totalling 2973 sqm. (net) with access and parking	Granted 19/10/2000
P/0483/08DFU – Alterations to shopfront and side elevations	Granted 31/03/2008

4.0 **CONSULTATION**

4.1 5 x Site Notices were erected on 25 June 2020 expiring on 06 August 2020 (42 days).

4.2 Press Notice was advertised in the Harrow Times on the 2nd July 2020 expiring on 23rd July 2020. The application was advertised as a major application.

4.3 A total of 948 notification letters were sent to nearby properties regarding this application. The public consultation period expired on 05 August 2020.

4.4 A re-consultation took place on 18 November 2020 for a period of 28 days expiring on 09 December 2020. 5 x site notices were erected on 20 November 2020, expiring on the 18 December 2020. The re-consultation accounted for the following revisions:

- Amendments to the proposed landscape masterplan and site redline boundary;
- Changes to the proposed affordable housing provision;
- Amendments to the affordable housing mix;
- Changes to the location of wheelchair accessible unit provision;
- Revised Fire Statement, prepared by Clarke Bank;
- Revised Energy Statement, prepared by JAW;
- Increased typology and provision of play space; and
- Addition of a Green Roof/PV Plan.

4.5 **Adjoining Properties**

Number of letters sent 1 st Consultation	948
Number of letters sent 2 nd Consultation	963
Number of Responses Received 1 st Consultation	28
Number of Responses Received 2 nd Consultation	6
Number in Support	1
Number in Support (2 nd consultation)	36
Number of Objections	27
Number of Objections (2 nd consultation)	4
Number of other Representations (neither objecting or supporting)	1

4.7 27 objections were received from adjoining residents after the first consultation and one letter of support and 6 objections, 36 support letters and 1 general comment were received after the second consultation.

4.8 A summary of the responses received along with the Officer comments are set out below:

Impact to operation of Waitrose

Waitrose keen to ensure proposed development would not impede on store's existing operation.

Existing permission which restricts the reconfiguration of Waitrose car park. If planning permission is granted a condition to reconfigure Waitrose car park should be included to ensure they can continue to trade successfully.

Request for legal agreement / condition to be in place to ensure that pedestrian route / cycleway along the eastern boundary of the site due to ownership issue with Waitrose and removal of existing car parking spaces and exit slip road to Shell Petrol Station. This may result in congestion.

Landscaping proposed on eastern boundary is outside ownership of applicant. Row of trees proposed on western boundary of Waitrose store should not harm the existing retail structure. Evidence should be provided to this effect.

Boundary treatment: Effective acoustic, visual and potential security barriers between the car park and residential units should be provided. Full description of boundary treatments should be included as a condition.

Access Route: The existing service road would be used by vehicles, pedestrians and cyclists of the new development but this was never designed to used by the general public. Waitrose wish to see tracking of their vehicles to ensure that the development would not compromise HGV movements to and from the store as well as ensure the safety of pedestrians using this path.

Parking provision: S106 should be agreed to include an ANPR or fund the cost of patrolling car park to ensure residents or visitors to development are discouraged to park in the Waitrose car park.

Impact of construction: Waitrose request a condition to allow a full CLP for review to ensure that construction impact to the store is minimised is included to any grant for permission.

Amenity concerns: Appropriate noise mitigation should be put in place within the housing design so that these are sufficiently robust from the outset so as not compromise the existing Waitrose operation. EHO comments should be made available.

Second consultation:

- Permission WEST/324/95/FUL has a restrictive condition which approves the car parking layout and states these should be permanently marked out and used for no other purposes without the written permission of the local planning authority. If permission is granted a condition stating that the development cannot be implemented until planning permission has been granted to

reconfigure the Waitrose car park.

-The revised scheme involves the removal of the exit slip lane into the PFS meaning all vehicles have to enter the station via the minimum roundabout.

Waitrose are concerned with this arrangement resulting in congestion.

- It is noted that the southern access is now the primary vehicular access point, where Waitrose currently services the store. Subject to the applicant demonstrating that the proposed vehicular access arrangement to the Waitrose store is acceptable, Waitrose to do not object. Careful consideration with regards to delivery and servicing should be addressed to provide safe access to the site.

Officer Comments:

Any grant for planning permission would allow for the reconfiguration of the car park to take place. As the restrictive condition is outside of the site boundary and the developer does not own the site under which the condition has been imposed, the developer cannot be obligated to relieve any restrictive conditions outside of their site ownership / development boundary. Furthermore, the development does not rely on access to and from the development from within the Waitrose site and is envisaged to provide sufficient safety measures including lighting strategies within the proposed development and it is therefore considered unreasonable for the developer to provide either an ANPR or fund the cost of patrol officers within the Waitrose site.

The removal of the retail units and new vehicular entrance to the site is envisaged to result in a significant reduction of traffic using the access adjacent to the PFS. The LPA therefore consider that the reduction to a single point would provide a streamlined and safer route for users.

Improvements via Section 278 legal agreement would ensure that the southern access provides a safe route for pedestrians and cyclists. The developer has also provided information on the low levels of servicing per day for the Waitrose which would further reinforce the safety of this route.

Details of boundary treatments, construction and noise mitigation have been secured by condition.

Traffic and congestion

Area already congested due to neighbouring developments, evidenced by increased traffic, pollution, noise and crime/anti social behaviour.

Queues and overcrowding on public transport, potential risk to people.

No safe cycle routes to key destinations in Harrow

Officer Comment: *The impact on the surrounding highway in terms of congestion, parking, transport services and air pollution has been addressed under 'Traffic, Parking, Access, Servicing and Sustainable Transport' and 'Air Quality' sections of the appraisal below. Provision of wider cycle route infrastructure is outside the remit of the current application.*

Loss of retail units

Already limited superstores. Proposal would result in loss of easy access to these as well as physical activity for locals.

Officer Comment: *There are no planning restrictions that would preclude the site from coming forward for residential development.*

Insufficient infrastructure

Current residents of this area already face denials/ challenges getting council parking permits. There are not enough GP Surgery, Schools, Recreation facility to support new development.

Transport infrastructure would be exacerbated.

Officer Comments:

The provision of local infrastructure is outside of the remit of the current application, however Community Infrastructure Levy for the market properties will retrieve funds towards these services.

Other matters

Lack of objections available to view on the website between July 7th and 26th July 2020

Increase in noise, dust and pollution

There is no demand for low quality residential properties in South Harrow

Officer Comments:

-All comments are available to view online. During the summer period there were a number of major applications which were submitted concurrently which resulted in a large volume of comments being lodged at the same time for various applications. This resulted in a delay in uploading all the comments. However, an extended consultation period was provided of 6 weeks and it is therefore not considered any interested party would have been disadvantaged as a result.

- Noise and dust limitation will be secured by condition.

-The proposed housing would meet and exceed policy thresholds in respect of national housing standards and is therefore considered to be of high quality.

Support Letters:

- 25% affordable homes (72% of which would be family homes) is much needed and help Harrow meet Housing targets.

- Development creates over 1000sqm green space, including new trees, public gardens and playspace

4.9 Statutory and Non Statutory Consultation

4.10 The following consultations have been undertaken:

LBH Policy Officer

The existing use is retail (Use Class A1) but is noted as not being within a designated business use area, designated town centre, or designated town centre parade. By reason of this (and although a number of comments have been received objecting to the loss of the retail units), the employment floorspace is not protected by policy as it would if it were to be located within the locations listed above. Given the above, there is no objection to the loss of the retail Use (Use Class A1). Within the context of planned growth across London, the proposal therefore accords with Harrow's vision for the development of the Borough as a whole and for the South Harrow sub area. Specifically, the proposal for the provision of housing on the site is consistent with the Strategy's broader objective to meet development needs on previously developed land, and to do so in sustainable locations, without resorting to development on greenfield and garden land.

The proposed development, by reason of exceeding ten units on site, is required to make a contribution to affordable housing.

LBH Highways Officer

First consultation:

Overall, with mitigation, the proposal is unlikely to result in a severe or harmful impact to the surrounding highway network, therefore, subject to conditions and obligations, Highways have no objection.

Second consultation:

The reduction in number of lanes is a positive for pedestrians using the supermarket as it means less opportunity for conflict as all vehicular movements are concentrated into a single area however, no dedicated ped/cycle link is not ideal. The main pedestrian route to the south is less desirable as this is where servicing for Waitrose takes place. The revised options are feasible but not as good as the previous plans. This layout does not offer quite the same level of safety and is less appealing.

However, these options could work provided they do not hinder HGV access at all. Improvements to the service road beyond the application boundary can be dealt with via Section 278 legal agreement and would encourage sustainable and safe travel from the main pedestrian and cycle access route proposed to and from the site.

LBH Energy Officer

The submitted energy strategy is notes that the overall saving would be 43% on site which is in excess of the required on-site savings of 35%. Therefore,

the proposed development would achieve a satisfactory on-site savings for a residential development.

The applicant has proposed an interim strategy to be utilised until such time as the development is able to be connected to the Grange Farm heat network. This approach is supported by Policy S13D(a) and is therefore encouraged and should be secured by way of condition.

The application requires a s.106 obligation to secure the off-site contribution which would be calculated post construction.

LBH Drainage Officer

I can confirm that the information provided in the addendum are satisfactory and the application can be approved conditionally.

LBH Tree Officer

There are no preserved trees within influencing distance of the proposed development and due to the nature of the current site (mainly industrial buildings and hard standing) there are no internal trees which would pose a constraint on the development. There are several trees near to the north boundary, within the housing block to the N / NE however these should not be impacted by, or pose a constraint on the proposed site – No objections

LBH Network Manager

No objections.

LBH Landscape Architects

First consultation:

Much more detailed information would be required to understand all the proposed hard and soft landscape details and this can be conditioned, these shall include:

- The third, fourth floors show outdoor amenity terraced spaces with hard surfacing and soft landscape. Details are required on the proposed privacy screens including obscured glass balustrade for outdoor amenity terraced spaces.
- Information on the microclimate and how windy the terraced areas might be would be required.
- Green roof proposals together with how the soft landscape on all the flat roofs would be managed and maintained.
- Details of the proposed bin and bike stores and the soft landscape screen required.
- Proposed external lighting and layout required.
- Details required of how the public realm areas are to be managed and maintained to ensure the ongoing success of all the external landscaped

amenity spaces.

Second consultation:

The revised proposals are of concern.

Much more detail is required to understand how the proposal might work. There would be no opportunity for soft landscape, as already shown on the existing masterplan. Further details and revised information should be requested by condition for further review.

LBH Biodiversity Officer

Conditions have been outlined to make the scheme acceptable in planning terms, by ensuring that it will have a positive impact on biodiversity, but the applicant will need to outline and commit to the implementation of detailed proposals in this regard.

LBH Housing Enabling Manager

First Consultation:

The Council's LAR target bed size mix has been calculated to meet the borough's priority need, with its greatest needs being for 2 and 3 bed LAR units and a person occupancy mix for LAR of 2b 4 person and 3b 5 person units. This bed mix offer will not be compliant as it will not meet the borough's priorities.

In terms of internal layout of the LAR units, Housing do not want units being offered as en-suites however to meet the needs of the Council's applicants Housing would like a separate living / dining room and kitchen areas if possible. Housing have no comment on the size or configuration of LSO units.

For the sake of handling the management and service charge of the AH units, Housing require the LAR units to be in a separate core or only sharing with the LSO units. (The LSO units could also share a core with private units). Housing require 10% of all the LAR units to be fully wheelchair adapted, with a 2 / 3 bed preference.

Second consultation:

This scheme is offering the maximum reasonable amount of AH deliverable, with a preferential balance of 2 and 3 bed LAR units which will meet Harrow's greatest housing need. Housing would therefore support the application (Further details are provided within Section 6.3 of this report).

LBH Waste Officer

The route looks fine for the majority of the North East part of the site. No collection points/access are highlighted along the back end so the Council would expect those bins to be brought to collection points on the estate with suitable access for the vehicle and staff. A condition requiring the development to be carried out as per the delivery and servicing plan submitted is suggested.

LBH Urban Design

This is a well-designed residential development. The layout has been thought about carefully to minimise the impact of the car park on the development, with clearly defined fronts and backs to the main blocks and quieter garden and courtyard spaces to the edge of the site away from the carpark. Future development **of the Waitrose carpark has been looked** at as part of a wider masterplan for the site in the application. New access to the site and areas for highways improvements to upgrade connections to Northolt Road and South Harrow Station are welcomed. New links to the adjacent Grange Farm site have also been made, which will be positive for both developments, and allows the residents to access the Grange Farm communal landscape and community facilities.

The landscape design has been well executed to create a series of different types of spaces and soften some of the more challenging areas of the site. The play strategy provides a range of different play space for different ages, and the two main streets within the scheme are designed to be play streets. Traffic and access through

There are three types of building proposed – mews, linear and pavilion block. Care has been taken to ensure that frontages are as active as possible, with front doors to streets, and homes are well laid out and designed.

LBH Economic Development

If the development is approved, as a major application, the following is sought in any s106 agreement:

- Construction Training – a requirement to produce a training and employment plan and provide a financial contribution
- Local Supplier targets
- Economic Development would seek through the planning system to mitigate the loss of the jobs associated with the existing development and the loss of future potential employment on the site.
- Construction Training
 - This will be secured through
 - (i) a training and employment plan that will be agreed between the council and the developer prior to start on site and
 - (ii) a financial contribution towards the management and delivery of the construction training programme based on the build cost of the development. This is usually charged based on a formula of £2500 per £1m build cost.
- To ensure local businesses benefit from the investment in the area, the Economic Development Team require that 15% of spend during the construction of the development is with suppliers in the council's administrative area.
- Any s106 agreement will include penalty clauses for non-compliance with the above.

LBH Travel Plan Officer:

We need the following to be secured by legal agreement:

- Monitoring fee of £5k
- Bond to be agreed between Council and developer
- Residential TP with specified requirements

- 4.11 The comments of the consultees are addressed within the relevant sections of the assessment.

External Consultation

- 4.12 A summary of the consultation responses received along with the Officer comments are set out in the Table below.

GLA (including TfL comments)

First consultation:

Principle of Development: The loss of retail uses does not raise strategic concern (paragraphs 13-16).

Affordable Housing: The applicant's viability assessment will be robustly scrutinised by GLA Officers to ensure the scheme provides the maximum reasonable amount of affordable housing. Early and late stage viability review mechanisms, and affordability levels should be secured (paragraphs 17-26).

Design: The proposal seeks to optimise the site and the proposed building heights are sympathetic to the surrounding context. Further consideration should be given to elements of residential quality, and further information is required in relation to the proposed play strategy. A revised fire statement must also be provided, evidencing compliance with the Mayor's Intend to Publish London Plan Policy D12 (paragraphs 30-48).

Transport: Options for improved pedestrian access to the site, as well as links from the proposed on-site cycle route into wider cycle routes, should be reviewed and improved. An assessment of collision analysis should be undertaken. A delivery and servicing plan, and construction logistics plan should be secured by condition. (paragraphs 64-70).
Issues relating to energy, air quality and urban greening need to be addressed.

Recommendation: That Harrow Council be advised that the application does not yet fully comply with the London Plan and the Mayor's Intend to Publish London Plan, for the reasons set out in paragraph 75 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Second consultation:

Please find post stage 1 comments in relation to energy, urban greening and air quality, attached and below, to be addressed.

Energy

SAP calculations based on the energy mix should be provided. Evidence of correspondence with network operator to provide provisional agreement of decarbonisation with the Grange Farm Development network.

Urban greening

A proposed roof plan has been provided which shows the location of proposed green roofs, and the minimum substrate depth of these roofs. This satisfactorily resolves our Stage 1 query.

A revised urban greening factor (UGF) of 0.35 for the proposed development has been submitted, which is lower than the UGF of 0.4 submitted at Stage 1. The applicant should seek to include measures to improve the UGF, such as intensive instead of extensive green roofs, and/or providing green walls, to improve the UGF of the scheme. If this is not possible, robust justification as to why the UGF has been reduced and does not achieve the target is required.

Air quality

There has been no updated air quality information provided, so the comments in the Stage 1 response remain outstanding.

GLA Viability Consultant

First consultation:

Further clarification and additional information is required. This includes a full cost plan review and clarifications/ analysis on the sales value assumptions.

Based on the information provided and subject to the clarifications outlined above, it is likely that the scheme can deliver more affordable housing than the 10% currently proposed by the applicant. The S106 agreement should provide both early and late stage reviews

Second consultation:

The new affordable housing offer is an increase from 10% to 24.65% at a tenure split 73:27, London Affordable Rent: Shared ownership.

An updated appraisal has not been provided, but the applicant's advisors, Turner Morum, has issued a document setting out several outstanding matters which is considered below.

Several key matters remain outstanding in respect of values and inputs and no updated appraisals have been provided.

The LPA's assessors previously concluded that the provision of 23% affordable housing would result in a modest surplus and their updated appraisal based on the revised affordable housing offer should be provided.

Transport for London

At Stage 1, TfL recommended discussing arrangements with Waitrose as it would appear removing or adjusting individual parking bays could allow for improved pedestrian links between the store, the site and Grange Farm development. This appears to be tackled by provision or linking into pedestrian crossings within the Waitrose car park.

The latest transport report refers to adjustments to the pedestrian routes, footway width and crossing changes as part of the design, and changes to the mews block design to help ensure visibility and safety for cyclists and pedestrians. TfL recommended a Road Safety Audit of the proposed highway design, oversight of the audit is responsibility of the relevant highway in this case Harrow. The transport report doesn't say if the changes proposed are result of a RSA or specific discussion with Harrow highway officers. This should be confirmed.

At Stage 1 it was unclear how the on-site cycle route links into wider cycle routes. The latest transport report does not answer this request for clarity. Please can the applicant confirm how the on-site route ties into the wider network and if that goes beyond the immediate site boundary.

As requested at Stage 1, Delivery and Servicing Plan and Construction Logistic Plan should be secured by condition.

Environment Agency

The previous use as a gas holders will have been a COMAH lower tier site, however these were de-notified a number of years ago. Therefore we have no comments with regard to this.

Land contamination

The site does not appear to be situated in a vulnerable groundwater area. Where land contamination may be an issue for a prospective development. Developers to employ specialist consultants/contractors working under the National Quality Mark Scheme.

It is recommended that the requirements of the National Planning Policy Framework and National Planning Policy Guidance are followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. We expect reports and Risk Assessments to be prepared in line with our Approach to Groundwater protection (commonly referred to as GP3) and the updated guide Land contamination: risk management (LCRM). LCRM is an update to the Model procedures for the management of land contamination (CLR11), which was archived in 2016.

Ministry of Defence

First Consultation:

The MOD requests that a condition such as the one below be included in any planning permission granted to ensure that the MOD is notified of when and where cranes will be erected.

In conclusion, provided the maximum build height does not exceed 82.725m AODL and a condition is applied to any consent granted for the submission of a BHMP and a Construction Management Strategy then the MOD does not object to this proposal.

It is important that the conditions requested in this response are included in any planning permission granted as per Planning Circular 01/03: Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas, if Harrow Council decides to grant planning permission contrary to our advice then we must be notified 28 days prior to a decision being made.

Thames Water

Thames Water would advise that with regard to surface water network infrastructure capacity, we would not have any objections to the above application based on the information provided.

Thames Water would advise that with regard to foul water sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

London Underground

No comments

Chemicals, Explosives and Microbiological Hazards Division - Unit 5 (CEMHD5)

This application does not fall within the Consultation Distance Zones of either a Major Hazard Site or Major Accident Hazard Pipeline.

The Health and Safety Executive (HSE) is a statutory consultee for certain developments within the consultation distance of Major Hazard Sites and Major Accident Hazard Pipelines.

When potential development sites are identified, if any of them lie within the Consultation Distances for either a Major Hazard Site or Major Accident Hazard Pipeline Council can use Web App which is HSE's on-line decision support software tool, to see how HSE would advise on any proposed development - <https://pa.hsl.gov.uk>

Secure by Design

This development will require to achieve a Secured By Design (SBD) accreditation, the mere principles of Secured By Design is difficult to quantify, therefore only a SBD accreditation is acceptable as a planning condition to ensure that the right safety and security measures are incorporated, in order to keep the building and its occupants as safe and as secure as possible. There are concerns over some aspects of the proposed development.

The surrounding areas in and around Northolt Road and Grange Farm Close, in the immediate vicinity of this proposed development, has been subject to a number of organized criminal gang related incidents, over the last 10 years so access points between Grange Farm and the development should be reviewed. A number of other points have been raised relating to detailed aspects of the development and will be resolved via condition.

5.0 POLICIES

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

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

5.2 In this instance, the Development Plan comprises The London Plan 2016, The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan (AAP) 2013, the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan SALP 2013 [SALP].

5.3 While this application has been considered against the adopted London Plan (2016) policies, significant regard has also been given to policies in the Publication London Plan (2020), as this will replace the current London Plan (2016) when published and form part of the development plan for the Borough

5.4 The Publication London Plan was originally published in draft form in December 2017 and subject to Examination in Public (EiP) with the Panel’s report received in October 2019. The Secretary of State issued two sets of directions on policies in the subsequent London Plan (Intend to Publish Version) (2019). The Mayor of London has accepted the Secretary of State directions and has now sent the Publication London Plan (2020) to the Secretary of State for final approval to publish. As such, the entire Plan can be given significant weight. The Secretary of State has until the 1st February 2021 to either agree the Plan or issue further directives. Should the Publication London Plan (2020) be agreed by the Secretary of State, the Mayor of London will be in a position to publish it, thereby superseding the London Plan (2016) and giving it full weight as part of the Council’s development plan.

5.5 The Publication London Plan (2020) is a material planning consideration that holds significant weight in determining planning applications, with relevant policies referenced within the report below and a summary within Informative 1.

6.0 ASSESSMENT

6.1 The main issues are;

- Principle of the Development
- Housing Output
- Environmental Impact Assessment
- Character and Appearance of the Area
- Residential Amenity, Quality, Noise and Accessibility
- Traffic, Parking, Access, Servicing and Sustainable Transport
- Development and Flood Risk
- Trees, Ecology and Biodiversity
- Sustainability and Climate Change Mitigation
- Land Contamination and Remediation
- Air Quality
- Aviation
- Secure by Design
- Statement of Community Engagement
- S.106 Obligations and Infrastructure

6.2 Principle of Development

6.2.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan: 2.6, 3.3, 3.4
- Publication London Plan (2020): GG2, H1, E9, SD6, SD7, SD8

Loss of retail use

6.2.2 The application site comprises three retail warehouses located within an existing large car park also serving another large superstore (Waitrose) which also shares the physical site (but is not within the redline boundary). The proposal seeks to demolish the existing superstores on site, which would result in the loss of 2,973sqm of Retail (Use Class A1) floorspace. This would then be replaced by the 191 residential units and ancillary services listed in the development description.

6.2.3 Retail is an identified town centre use. The NPPF (2019), The Publication London Plan (2020) and Harrow Local Policies all recognise the importance that retail plays in the vitality and viability of town centres. By reason of this, the policies at all levels seek to direct such uses into town centres. Furthermore, local policies, in accordance with the NPPF (2019), have identified town centre boundaries within Harrow and primary and secondary shopping frontages. Local policies seek to protect retail within these areas. The existing use is retail (Use Class A1) but is noted as not being within a designated business use area, designated town centre, or designated town centre parade. By reason of this (and although a

number of comments have been received objecting to the loss of the retail units), the employment floorspace is not protected by policy as it would if it were to be located within the locations listed above. Given the above, there is no objection to the loss of the retail Use (Use Class A1).

Residential Use

- 6.2.4 The London Plan sets out to meet London's growth within the boundaries of Greater London. To address a gap between projected housing requirements, including a backlog of need and identified capacity, the London Plan expresses housing targets as minima. Harrow's minimum housing target is 593 homes per annum over the period 2011-2021. Policy H1 of the The Publication London Plan (2020) increases the minimum housing target to 802 homes per annum over the period 2020-2030. Policies SD6, SD7, SD8 and E9 of the (DLP)(ItP) seek to realise the potential of edge of centre sites (including existing retail parks) through mixed-use or residential development that makes the best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. Accordingly, the principle of the introduction of residential use on this out-of-centre site is supported. In accordance with Policy SD7 in particular of the Mayor's The Publication London Plan (2020), this net loss of retail floorspace to deliver housing intensification is considered to be acceptable.
- 6.2.5 Harrow's Core Strategy establishes a clear vision for the management of growth in the Borough over the Local Plan period (to 2026) and a framework for development in each district of the Borough. Policy CS1(A) directs growth to the Harrow and Wealdstone Opportunity Area and throughout the rest of the borough, within town centres and strategic, previously-developed sites. The policy provides for that growth to be managed in accordance with the relevant sub area policies, in this case South Harrow. The proposed development would deliver 191 dwellings towards the boroughs housing stock and is considered a significant contribution that is welcomed.
- 6.2.6 Within the context of planned growth across London, the proposal therefore accords with Harrow's vision for the development of the Borough as a whole and for the South Harrow sub area. Specifically, the proposal for the provision of housing on the site is consistent with the Strategy's broader objective to meet development needs on previously developed land, and to do so in sustainable locations, without resorting to development on greenfield and garden land.

6.3 Housing Output

6.3.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2016): 3.3, 3.4, 3.8, 3.10, 3.11, 3.13,
- Publication London Plan (2020): GG4, H1, H4, H5, H6, H10
- Harrow Core Strategy (2012): CS1I, CS1J, CS8I
- Harrow Development Management Policies (2013): DM24
- Mayor of London Affordable Housing and Viability Supplementary Planning Guidance (2017)
- Mayor of London Housing Supplementary Planning Guidance (2016)

Affordable Housing, Mix, Tenure

6.3.2 Affordable Housing is detailed in the National Planning Policy Framework (2019) as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the definitions within the following: affordable housing for rent, starter homes, discounted market sales housing or other affordable routes to home ownership (including shared ownership).

6.3.3 The proposed development triggers an affordable housing requirement as it constitutes a major residential development. Policy H4 of The Publication London Plan (2020) sets out a strategic target for 50% of all new homes delivered across London to be genuinely affordable. The policy also specifically requires that 50% of the quantum of housing is delivered as an affordable product on public sector land.

6.3.4 Having regard to Harrow's local circumstances, Policy CS1(J) of the Core Strategy sets a Borough-wide target for 40% of all homes delivered over the plan period (to 2026) to be affordable, and calls for the maximum reasonable amount to be provided on development sites. In terms of dwelling mix, The London Plan Policies makes reference to the priority that should be accorded to the provision of affordable housing. Policy DM24 of the Development Management Policies requires development proposals to secure appropriate mix of housing on site and to contribute to the creation of inclusive and mixed communities, having regard to the target mix for affordable housing set out in the Councils Planning Obligations SPD. Considerations include the priority to be afforded to the delivery of affordable family housing, the location of the site, the character of its surroundings and the need to optimise housing output on previously developed land.

6.3.5 In terms of tenure split, the strategic part of Policy 3.11 of the London Plan (2016) calls for 60% of affordable housing provision to be for social and affordable rent and for 40% to be for intermediate sale or rent. The Publication London Plan (2020), recognises that for some boroughs, a broader mix of affordable housing tenures will be appropriate and therefore provides a degree of flexibility based on the overall tenure mix. Policy H6 of the draft London Plan requires a minimum of 30% homes to be affordable rent or social rent, 30% to be intermediate products

which meet the definition of genuinely affordable housing, and the remaining 40% to be determined by the borough as low cost rented homes or intermediate products. At a local level, Harrow's planning obligations require that the Affordable units are split by tenure: 60% London Affordable Rent (LAR) to 40% London Shared Ownership / Intermediate (LSO).

- 6.3.6 The applicant proposes a 'without prejudice' affordable housing offer which would deliver 20% affordable housing (25% affordable housing provision on a habitable room basis), based on a tenure mix of 73/27% in favour of London Affordable Rent (LAR) product. The proposal would have the following tenure and mix:

Table 1: Affordable Housing Mix

	Total Units	% of total	Total Habitable Rooms	% of total
London Affordable Rent (LAR)	26	67%	91	73%
London Shared Ownership (LSO)	13	33%	34	27%
Total	39		125	

Table 2: Tenure Mix

Affordable Housing Mix

	1B 2P	2B 4P	3B 5P	Total (units)
London Affordable Rent (LAR)	5 (1 x accessible)	12 (1 x accessible)	9 (1 x accessible)	26
	19%	46%	35%	
Habitable Rooms	10	36	45	91 (73%)
	11%	40%	49%	
Shared Ownership (LSO)	6 (1 x accessible)	6 (1 x accessible)	1	13
	46%	46%	8%	
Habitable Rooms	12	18	4	34 (27%)
	35%	53%	8%	
Total units	11	18	10	39
Total habitable rooms	22	54	49	125
Percentage Mix	28%	46%	26%	100%

Table 3: Total Affordable Housing Units / Habitable Rooms

	Total Units (entire scheme)	AH units	% of total
Units	191	39	20%
Habitable Rooms	507	125	25%

- 6.3.7 In order to comply with the Core Strategy Policy requirement for 40% affordable housing on all the units proposed, this would equate to an approximate requirement of 76 units (40%) out of the 191 to be affordable. The Mayor's

Affordable Housing SPG details that the percentage of affordable housing in a scheme should be measured by habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes. Having regard to this, the 40% requirement would be the equivalent to 144 rooms to be provided as affordable rent. When taking the policy compliant split (60/40) into account by habitable rooms, this would require approximately 86 rooms to be provided as London Affordable Rent and approximately 58 rooms to be provided as an intermediate tenure.

- 6.3.8 The Council's Housing Officer has reviewed the offer by the applicants and notes that the scheme offers 39 Affordable Housing units which equates to 20% of the total units, which falls short of this borough wide target. The Mayor also requires Affordable Housing to be calculated by habitable rooms with a target requirement of 35% AH to be offered to qualify for fast tracking. As the scheme is offering 25% AH by Habitable rooms the applicant did not qualify for fast tracking and was required to provide a Viability Assessment which was assessed externally to prove the AH offer (39 units) represents the maximum reasonable AH achievable on the scheme.
- 6.3.9 The applicant submitted a Financial Viability Assessment (prepared by Turner Morum LLP) which was reviewed by the Council's external viability consultant (Avison Young, AY) as well as the Greater London Authority (GLA) respectively. On review, both the LPA's consultant and GLA found the initial maximum reasonable offer of 9% by unit and 10% by habitable room to be significantly lower than the threshold set by the Mayors The Publication London Plan and Borough wide target of 40%. The GLA required the applicants and LPA to also consider the following in subsequent negotiations:
- Full cost plan review and clarifications / analysis on the sales value assumptions;
 - AY should consider comments within the GLA Stage 1 report;
 - Profit assumptions should be reviewed given that "*The proposed scheme is a low rise development of up to 6 storeys and is relatively straight forward to deliver – this would indicate that the profit assumptions should be at the lower end of the standard range of 15-20%. There is no valid justification provided by the applicant that would indicate a profit requirement of 20%. AY have assumed a rate of 17.50% but this is also higher than we would expect to see taking into the larger and more complex schemes where this figure has been applied. A figure of 16.5% is considered more appropriate.*" (GLA viability comments);
 - It is likely that the scheme can deliver more affordable housing than the 10% currently proposed by the applicant; and
 - The S106 agreement should provide both early and late stage reviews.
- 6.3.10 Following discussions between both the applicant and the LPA's Financial Viability consultants, AY concluded that the scheme could viably afford 14% Affordable Housing (AH) (16.75% affordable housing in terms of habitable rooms) at a profit level of 17.5%, amounting to what is considered to be the maximum reasonable amount. Following this, the applicant put forward a 'without prejudice' offer which would deliver 20% affordable housing units (39 units) which would

equate to 25% affordable housing provision on a habitable room basis (125 habitable rooms). This would exceed what is considered to be the maximum reasonable Affordable Housing deliverable for this development as suggested by the Council's Financial Viability Consultant (AY). AY have confirmed that the offer would be appropriate. The LPA have accepted the increased offer put forward by the applicant as it would assist in the delivery of much needed Affordable Housing in favour of the priority tenure. The offer would also assist in weighing in favour of the scheme in terms of planning balance should it be resolved to grant permission and would be secured by way of legal agreement.

- 6.3.11 To assess whether the offer achieves the maximum reasonable Affordable Housing for the development, Harrow's Planning Obligations SPD requires a tenure split: 60% London Affordable Rent (LAR) to 40% London Shared Ownership / Intermediate (LSO). Based on the applicants offer it would therefore be required to achieve a split of 23 LAR / 16 LSO by unit to be compliant. However, the AH offered would comprise a total of 39 units; 26 LAR (equating to 67% of the units, 73% by habitable rooms) and 13 LSO (equating to 33% of the units, 27% by habitable rooms). Whilst not strictly tenure compliant, the weight towards LAR units the Council's greatest priority need would be met and on this basis is considered acceptable. Furthermore, the Council's target bed size mix for LAR units are for 2 and 3 bed units with a Person occupancy mix of 2b4p and 3b5p. There is also a requirement of 10% of these to be wheelchair adaptable. As demonstrated in Table 2 these requirements have been met and the Council's Housing Officer is satisfied that the affordable housing tenure mix offered would be acceptable.
- 6.3.12 All the LAR units would be located within Plot 03 of the proposed development which is preferable for the ease of management and service charging. These would be accessed via a single core which would only be shared with LSO units which would be acceptable. Policy T6 in the Draft London plan requires the provision of 1 designated wheelchair parking space to 3% of the total dwellings across the whole scheme (6 spaces). Housing Officers have requested confirmation of whether any LAR units would have allocated wheelchair spaces and if so, the siting in relation to the unit. An updated ground floor plan was provided showing where an additional disabled bay could be located in closer proximity to the LAR units resulting in a provision of 7 disabled bays. This should be included within the details submitted as part of a car parking design and management plan to be submitted to and approved by the Council.
- 6.3.13 On the basis of the above, the development offers above what is considered to be the maximum reasonable amount of Affordable Housing deliverable as advised by the LPA's Financial Viability Consultants, with a preferential balance of 2 and 3 bed London Affordable Rent units and on this basis is considered acceptable.
- 6.3.14 Notwithstanding, the above position, the applicant has agreed to the use of a review mechanism to be applied to any decision to grant permission. The use of both the early and late stage review mechanism is supported by the Mayor where schemes provide a lower than policy threshold quantum of affordable housing. This would enable the financial viability of the development to be re-appraised at

an appropriate time point (or points) during the course of the development to capture any additional affordable homes to be provided on-site, in the first instance, otherwise as a cash in-lieu sum for off-site provision. The values and inputs for these mechanisms have largely been agreed although there are some outstanding matters including the appropriate profit level to be applied which require further discussion. An early and late stage review has therefore been recommended, and this mechanism is included in the S106 Heads of Terms. Subject to such a clause within a S106 agreement to be attached to this permission, it is concluded that the proposal would comply with the relevant policies regarding affordable housing provision.

Housing Mix

- 6.3.15 The London Plan Policy 3.8, 3.11 and ‘The Publication London Plan (2020) policy H10 encourages new development to offer a range of housing choices in terms of mix and housing sizes and types. This is reinforced by Core Strategy Policy CS1 which requires new residential development to promote housing choice to meet local needs and to maintain mixed and sustainable communities. Development Management Policy DM24 states that *“the appropriate mix of housing will be determined having regard to the location of the site, the character of its surroundings and the need to optimise housing output on previously developed land.”*
- 6.3.16 It is noted that the proposed development seeks to deliver 93 x 1 beds, 70 x 2 beds and 28 x 3 beds. Whilst the Local Planning Authority is unable to prescribe a housing mix for market sale dwellings, it does seek to ensure there is an appropriate housing choice delivered within a scheme, which is in part informed by local evidence base. It is noted that the proposed housing mix is weighted slightly more toward the lower occupancy than desired. However, and noting the above inability to prescribe the mix, the application site is located within 350m of a town centre and previously developed land. By reason of this, it is reasonable that there would be a higher number of lower occupancy dwellings that in a more suburban location. Notwithstanding this as shown in Table 4 it is noted that there is still substantial amounts of larger units, which would provide a choice of family sized homes as well as the provision of on-site affordable housing weighted towards London Affordable Rent.
- 6.3.17 It is therefore considered that the provision of a range of unit sizes including family sized units as well as a mix of tenures would represent an appropriate housing mix akin to its sustainable location and development on previously developed land and in accordance with the policies mentioned above.

Table 4: Housing Mix for entire development

	1B 2P	2B 4P	3B 5P	Total
Plot 1	67	31	14	112
Plot 2	16	22	4	42
Plot 3	10	17	10	37
Total Units	93	70	28	191
Total (%)	48.7%	36.6%	14.7%	100%

Housing Supply and Density

- 6.3.18 London Plan and Local Plan policies on housing development must be viewed in the context of the forecast growth across London and Harrow's spatial strategy for managing growth locally over the plan period to 2026. These are set out in the Principle of Development section of this report (above). The proposal's contribution to housing supply ensures that this previously developed makes an appropriate contribution to the borough's housing need over the plan period to 2026 and towards fulfilling the Core Strategy's target for the South Harrow sub area.
- 6.3.19 Furthermore, the regional policy context (policy H1 of the Publication London Plan) requires boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites with particular focus on sites with existing access levels (PTALs) 3-6 that are located within 800m distance of a station, and redevelopment of car parks and low-density retail parks and supermarkets as a source of capacity.
- 6.3.20 Policy 3.4 of the London Plan (2016) seeks to optimise housing output from development by applying the sustainable residential quality density matrix at Table 3.2 of the Plan. Within the definitions of the London Plan density matrix, the site is considered to have a central setting and has a PTAL of 4 although part of the northern area of the site also falls within PTAL 2, although accessibility is generally good in real terms given the site's close proximity to public transport links. When applying the density matrix within the London Plan (table 3.2), the proposal would equate to a density of 484 habitable rooms per hectare, which is considered to be appropriate at this location.
- 6.3.21 However Paragraph 3.28 of the reasoned justification to Policy 3.4 makes it clear that the density matrix is only the start of planning for housing development and that it should not be applied mechanistically. Further guidance on how the matrix should be applied to proposals is set out in the Mayor's Housing SPG and this indicates that whilst the maximum of the ranges set out in the density matrix should not be taken as a given, reasons for exceeding them should be clearly demonstrated. In this instance the positive attributes of the scheme are considered to provide clear and robust justification for the development to the density proposed. These attributes include; the allocation of the brownfield site in the Local Plan, its sustainable location and current function as a car park, which is specifically identified as a source to increase housing growth capacity, the public benefit attributed to the provision of affordable housing, and the delivery of a high quality scheme.
- 6.3.22 Furthermore, The Publication London Plan (2020) removes the density matrix that was previously included in order to promote a design lead approach rather than the application of a prescriptive matrix. Policy GG2 of The Publication London Plan (2020) notes that higher density development should be promoted, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. The policy goes on to note that the appropriate density of a site should be arrived at through a design-led approach, which is set out in detail under Policy D3 of the draft Plan.

- 6.3.23 The design considerations of the development have been considered in detail within the subsequent sections of the report. As noted in the submitted Design and Access Statement, the application proposal has been the subject of extensive pre-application discussions with the Council and has evolved in response to design scrutiny following Design Review Panels and discussion with Council Officers. It is considered that the proposed design of the site effectively optimises development on an accessible, brownfield site, whilst responding to the local context. The Publication London Plan (2020) and the approach embedded within the policies to optimise the capacity of sites, are a material planning consideration that hold significant weight.
- 6.3.24 For the reasons set out above, and as the density proposed has been achieved using a design-led approach, officers consider that the density of the proposal would be acceptable. Furthermore, any significant reduction in the density of the development could constitute an under-utilisation of the site (in the context of growth), with implications for viability of the development and subsequent delivery of affordable housing.

Summary

- 6.3.25 The proposed development would bring forward 191 units of housing, 20% of which would be affordable (25% by habitable room) and would therefore make a valuable contribution towards the Government's objectives of significantly boosting the supply of housing and meeting the housing needs of all. As to the split of tenures, the application would deliver 5 x 1 bedroom and 21 family sized London Affordable Rent units, which is the most affordable of all the tenures and the priority need within the Borough. In terms of the policy requirement provision and tenure split, the London Affordable Rented provision would represent 73% of the required policy compliant offer on a habitable room basis, with the remaining 27% coming forward as Shared Ownership (intermediate housing tenure). The remaining 60% of units would be offered as Shared Ownership units, with affordability aligned to local household incomes and local needs. The proposed affordable housing offer therefore goes beyond the policy requirements of the borough and the Mayor's requirements.
- 6.3.25 The delivery of 191 new homes (including the 39 Affordable Housing units above maximum reasonable policy requirements) is considered to constitute a public benefit which contributes to the achievement of local policies, the strategic level need for new (affordable) homes for London and the Government's policy objective of boosting significantly the supply of homes.

6.4 Environmental Impact Assessment

- 6.4.1 The requirement of the Environmental Impact Assessment (EIA) Regulations 2017 is based on the likelihood of significant environmental effects arising from a new development and are divided into Schedule 1 and Schedule 2 applications under the EIA Regulations. Schedule 1 would normally constitute developments that would have significant effects on the environment such as major chemical projects or ground and air transport infrastructure. Schedule 2 consists of other forms of developments that are dealt with under a threshold approach. The proposals falls

under Schedule 2, Part 10 (b) relating to *Urban Development Projects* at the development includes more than 150 dwellings. Given the quantum of development proposed is considered to be EIA development.

- 6.4.2 The applicant requested an EIA Screening Opinion from the LPA (planning reference: P/0361/20) in accordance with Regulation 6 (1) and (2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations'). The accompanying EIA Screening Appraisal assessed the proposal against Schedules 1, 2 and 3 of the EIA Regulations and the Governments Planning Practice Guidance (PPG).
- 6.4.3 The LPA concluded that the development was considered not to be a development that triggered the thresholds, and therefore did not require an Environmental Impact Assessment to accompany it. It is noted that there have been amendments to the scheme, insofar as the design and layout. However, there has been little change to the intensity of what is proposed, insofar as unit numbers, vehicle parking, and the community centre. Therefore, it is considered that notwithstanding the amendments to the scheme, the proposed would still not trigger an Environmental Impact Assessment.

6.5 Character and Appearance of the Area

- 6.5.1 The relevant policies are:
- NPPF: Chapter 12
 - London Plan: 7.4., 7.5, 7.6, 7.7 and 7.13
 - Development Management Local Policies: DM1, DM7, DM22, DM23 and DM45
 - Publication London Plan: D1, D3, D11, D12, HC1
- 6.5.2 The surrounding area is mixed in character. The site itself comprises surface car parking and three large retail units with limited active frontage and urban design quality. The wider area is in flux with no prevailing or distinctive pattern of development. The area is characterised by a mix of uses including residential, industrial, hotel and retail. Notwithstanding this, the imminent redevelopment of the Grange Farm Estate directly north of this building is likely to transform the quality and setting of the wider context inherent to the existing transitional nature of the area.

Emerging Context and Layout

- 6.5.3 Permission was granted on 29 March 2019 for the redevelopment of the Grange Farm Estate to the east of the site under planning reference P/3524/16. Consent was secured in 'Hybrid' form with detailed consent granted for Phase 1 and landscape proposals and outline consent for Phases 2 and 3. The consented development offers opportunities to improve connections around the South Harrow area, through improved pedestrian links and improvements to the variety of open space. The scale of the development respects the amenities and scale of the surrounding area, taking architectural cues from the sites 'Metroland' setting. These elements have heavily influenced the design and development of the current proposals increasing permeability and legibility across both developments, whilst complimenting the scale and design of the approved scheme and wider

context. To reinforce the need for consistency between the two schemes, Hawkins Browns Architects who designed the adjacent consented scheme were appointed to develop the current scheme proposals.

- 6.5.4 Progress has already been made for the implementation of Phase 1 of the approved scheme. Whilst Phases 2 and 3 (located closer to the subject site) have only attained outline consent, the siting and heights of these blocks have been agreed and will not be subject of the detailed reserved matters application. Accordingly, the proposed development will be assessed in terms of the emerging context in respect of the Grange Farm Development.
- 6.5.5 This scheme has been extensively developed through detailed pre-application discussions held with Officers, the Urban Design Officer and external design consultants. It was presented at two design review panels between March and April 2020. The Panel (DRP) support the proposal and judge it to be a high-quality scheme. Both the DRP and the Harrow urban design advisor made a number of recommendations for improvements throughout the process, and the design team have addressed all major points in this application.
- 6.5.6 The proposed development has been laid out to provide three distinctive blocks (Plots 01, 02 and 03) for the provision of residential use. The layout maintains the main customer, employee and service accesses to the existing Waitrose Store as well as the existing surface car parking spaces for the store, albeit would result in reconfiguration. Beneath the Waitrose store and surface car park between Brember Road and Northolt Road is a culverted river. A 5m exclusion zone is required to be maintained from the centreline of the culvert. Although this does not necessarily impact the proposed scheme heavily it sterilizes the southern tip of the site (end of the service road) from development. The layout and design are reflective of this.

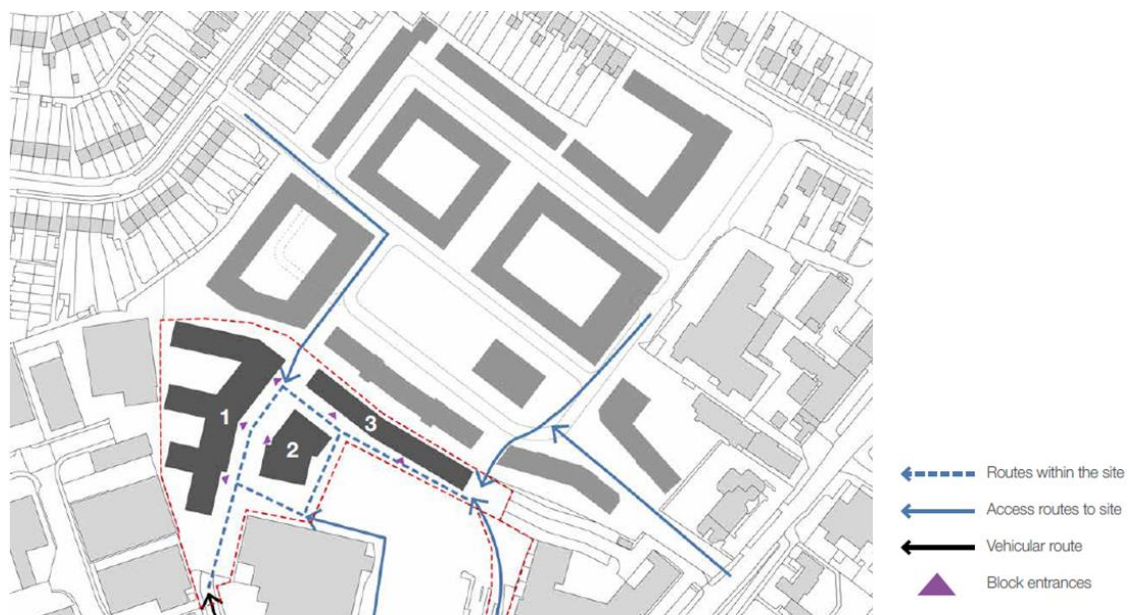


Image 1: Plot layouts in context of consented Grange Farm Scheme to the north (Design and Access Statement, Chapter 4.0)

- 6.5.7 The site has been designed to improve physical and social connections to the existing and emerging community. The south-west corner (via the existing service road) of the site is the main access to the development and would cater for pedestrians and cyclists as well as being the only vehicular access into and out of the site. This is because the surface level car park is located within Plot 01 on the western boundary which removes the need for vehicles to enter the site (with the exception of service and emergency vehicles), creating a predominantly pedestrianised environment. This is supported by proposed improvements to the existing service road including potential widening of the footway leading to the site, provision of zebra crossings and improved lighting to be secured as part of Section 278 legal agreement (discussed later in the report). These improvements would also improve safety within designated green and play space within the proposed development. Improvements to create a single access on the northern boundary, to provide less conflict between vehicles and pedestrians than the existing situation is considered acceptable for the provision of a secondary cycle route and pedestrian access to the development.
- 6.5.8 Opportunities to maximise wider connectivity have also been considered within the layout of the scheme, namely in the placement of key access points from Grange Farm and the siting of the main public spaces within the development. Key pedestrian routes to the Waitrose store and beyond towards South Harrow Station through the existing car park have also been identified. Whilst routes through the Waitrose car park are not encouraged, it is considered that the improved routes and access brought about by the development would detract occupiers and visitors from using this as a primary route, unless to access the supermarket.
- 6.5.9 The site is tightly bound by various constraints on the outer boundaries. Plot 01 seeks to extend the building line (although not adjoined) of the westernmost courtyard block of the Grange Farm development southwards into the site. The main street facing part of Plot 01 extends westward to present gable ends to the Brember Road Industrial Estate with a sequence of communal courtyards to buffer and minimise impact from the adjacent use. Plot 02 is centrally located within the development around which the circulation of the site is articulated. Plot 03 defines the northern boundary and street edge respecting and designed to modulate the emerging adjacent Grange Farm block approved, as reinforced in Image 1. All blocks would have active ground floor frontages and sufficient distances (between 11-22m) would be provided between the proposed blocks. A planted buffer extends around the car park edge, which would delineate a clear edge to the development from the Waitrose car park.

Future development with Waitrose

- 6.5.10 Although it is noted that the site currently shares surface car parking and access rights over the southern service road with the Waitrose site, this site is owned under a separate freehold. Discussions between the applicant and Waitrose have been had to ensure the current redevelopment would not preclude any wider redevelopment opportunities at the adjacent Waitrose site. Improvements to the connectivity and general layout have therefore been devised with the current access and servicing to the existing Waitrose store at the forefront.

6.5.11 The proposed layout is considered to be appropriate for the site. The layout includes the vehicular access points into the site, wider pedestrian and cycle routes to maximise connectivity beyond the site which have been carefully considered in relation to the functional requirements of the proposed residential use and car park re-provision. Officers are therefore satisfied that the proposal would achieve a high standard of development in relation to the layout considerations which safeguards for the existing and emerging context of the wider area.

Scale, Massing and Design

6.5.12 Three building types are proposed – Plot 01 (Linear), Plot 2 (Pavilion Block) and Plot 03 (Mews). Each would have a different character, material palette and design. The proposed blocks vary in scale from 4-6 storeys which is considered to be consistent with the existing and emerging context. This context comprises lower density development to the north and west (1-2 storeys); buildings up to 9 storeys directly south fronting Northolt Road and the emerging Grange Farm development to the east which will have a maximum height of 8 storeys. The heights have also been derived to respect the statutory safeguarding zones surrounding RAF Northolt as the site lies approximately 4.8km from the centre of the airfield. The site occupies aerodrome height, technical and birdstrike safeguarding zones. These safeguarding zones serve to ensure air traffic approaches and the effective operation of navigational aids and transmitters/receivers are not impeded. Any development within the site is therefore restricted to below the conical surface which is the area of protected air space. The MOD have been consulted and raise no concerns with the proposed height. The proposed height is accordingly considered to be sympathetic to the surrounding context.

Plot 01 (Linear)

6.5.13 It is noted that the industrial units and residential properties beyond on Stanley Road comprise mainly of 1-2 storeys. Plot 01 has therefore been designed sensitively to ensure high quality living accommodation for future occupiers and to respect the scale of the surrounding area. To the rear, the series of projecting wings create domestic scaled communal courtyard gardens that mediate in scale between the primary street block (6 storeys) and low-density boundary to the west by reducing the height of two of the wings to 4 storeys and southern-most block to 5 storeys. The wings are also staggered to align with the chamfer of the western boundary. The 6 storey wing to the north relates to the approved Grange Farm block (5 storey) adjacent with a minimum separation distance of 11.4m which is considered appropriate.

6.5.14 Plot 01 is also sited directly opposite Plot 02 although there is approximately 14m between them. This allows the linear street block to define the key routes through the scheme and respond to the natural desire lines of movement through the site. The ground floor units are characterised by large private amenity spaces as buffers between the streets and homes. This creates a good relationship with the street on a human scale as well as ample opportunity for natural surveillance. The

scale and mass have therefore been contrived to provide high quality of spaces within the plot but also respect the scale of the existing context to the west and emerging context to the north and is therefore considered acceptable. A series of inset balconies to the corners with clear corner posts, infill balconies within the massing recesses above communal entrances with some projecting cantilevered balconies (mainly to the rear of the block) are used to minimise the overall bulk of the development. The use of metal railings further reinforces this design approach.

- 6.5.15 In terms of elevational treatment, careful consideration has been made to create active frontages as far as possible. As such, the ground floor units have been designed laterally to frame the generous communal entrances to the apartments above. Whereas the entrances to the ground floor units are recessed as these are private. These units also provide screening to the ancillary accommodation of plant, cycle and bins as well as the podium car parking behind. The linear nature of this block is further accentuated by the regular fenestration arrangement and clear vertical emphasis. Pot 01 is proposed to comprise a reddish pink brick with light grey brick at ground floor level to define the entrances and frontages of the block which is consistent with the wider development.

Plot 02 (Pavilion)

- 6.5.16 Plot 02 is centrally located within the development. It is set in from Plots 01 and 03 by 12-14m and from the Waitrose store and car park by 13-18m. These large separation distances and its central location provide Plot 02 with greater flexibility in terms of scale. The block is 5 storeys in part facing the Waitrose site and main southern entrance and 6 storeys towards north and east of the site consistent with the adjacent proposed blocks. Plot 02 is smaller in overall mass than the other two and is viewed as a more sculptural and articulated 'building in the round' that acts as a physical focus and identity of the scheme. As such, it is experienced from all sides and addresses both the open aspect towards the car park and the new streets that loop around, through the use of private amenity gardens for the ground floor units served by individual entrances and a large central core accessed via the main communal entrance facing into the development. The smaller mass offers more opportunity for articulation of the facades comprising cantilevered balconies with some inset open corner balconies. This detailing is considered acceptable in the context of this plot. It is therefore considered that Plot 02 is comfortable in scale and mass both within the development and wider area.
- 6.5.17 As Plot 02 is located at the heart of the development, the brick proposed is a dark warm grey brick which is considerably darker than the other two plots. This is considered to provide greater emphasis and contrast visually against the other blocks, particularly when viewed from within the Waitrose car park and from the southern access. Furthermore, the use of an irregular fenestration arrangement with openings appearing as hit and miss and horizontal emphasis is considered to successfully provide architectural interest on all exposed elevations.

Plot 03 (Mews)

- 6.5.18 Plot 03 has a height of 4 storeys to the south east side and steps up to 6 storeys. This block directly fronts the Waitrose car park towards the west of the site and

replicates the mass of the approved 5-6 storey block at Grange Farm which runs parallel to the rear. Whilst the site itself is generally level, the Grange Farm site is higher (by approximately 1 storey), resulting in the height of the proposed blocks appearing lower and reducing the visual impact of the development from that side. The proposed 4 storey part of Plot 03 would have a separation distance of approximately 13.6m from the nearest Grange Farm block and would appear modestly as a 2-3 storey block from that side. The separation distance increases to 15.6m as Plot 03 increases to 6 storeys high (although this would appear as 4-5 storeys) from Grange Farm.

- 6.5.19 The design of Plot 03 has been developed to address the linear site boundary along the eastern boundary and has designed as a Mews Street, characterised by maisonettes at ground floor, each with their own front entrance. The street has been lowered and set back (by over 5m) to provide a visual buffer from the car park, although the street would be wide enough for Emergency vehicle access, and private defensible garden space to the front and planters / benches. The rear of the building has also been set back (by approx. 2.4m) from the shared boundary to provide private amenity space to the maisonettes. To reduce the overall massing of the block, inset open corner balconies and infill balconies within the building recesses above communal entrances have been provided. Projecting cantilevered balconies are kept to a minimal and are only proposed to the front of the block. Due to the appropriate separation distances, stepped roof height and level changes mentioned it is considered that the scale and massing of this plot is acceptable.
- 6.5.20 From an elevational treatment point of view, given the typology of the Mews block (Plot 03) and the siting of the building at the edge of the north eastern boundary, an articulated terrace style has been adopted. The first two floors comprise two storey, 3 bedroom maisonettes accessed via private entry courtyards. Separate expressed communal entrances for the floors above are provided for the upper floor units. The ground floor duplexes are highlighted with light grey brick and warm red / brown brick are proposed above. The simple flat roof design and stepped roof line is consistent with the scale and roof designs of buildings in the immediate vicinity. Openings have been provided either end of this block to avoid blank facades and to provide natural surveillance to the public spaces and main accesses to and from Grange Farm sited directly adjacent. The materials palette and architectural detailing are considered to reflect the nature of the typology proposed for Plot 03.

Architectural Detailing

- 6.5.21 Every indication is that the design and finish of the development would, if approved, be carried out to a high standard. The final choice of materials and the details described are critical to achieving the high-quality finish that has been promised, ensuring that the development exploits this opportunity to reinforce and enhance the positive attributes of the local built environment and is sympathetic to the wider area. It is therefore considered that the materials and other detailed aspects of the design, as set out in the Applicant's Design & Access Statement, should be controlled by conditions of planning permission to ensure the development maintains its attractiveness over the lifetime of the development.

6.5.22 In summary, Officers consider that the architects have developed a coherent design that also provides a varied yet consistent response to the different plots based on their individual typologies and site circumstances. It is considered that the elevations are simply designed with high quality brick details, balconies are alternated to the green link edge providing a more relaxed and playful appearance.

Heritage

6.5.23 The London Plan Policy 7.8 and Policy HC1 of the Mayor's The Publication London Plan (2020) state that development should conserve heritage assets and avoid harm. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". The NPPF states that, when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

6.5.24 Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Any harm must be given considerable importance and weight.

6.5.25 The site does not contain any designated heritage assets nor is the site located within a conservation area. There are no statutorily listed buildings or structures in immediate proximity to the site, however the site is located approximately 350 metres from the Mount Park Estate Conservation Area, approximately 300 metres from the Roxeth Hill Conservation Area and approximately 360 metres from the Grade II listed 29-37 Horn Buckle Close. Due to the distance of the proposed development to the designated heritage assets, the proposed development's built form, and the relative scale and character of the surrounding urban form, it is not anticipated the proposed development would be visible in conjunction with the designated heritage assets and therefore would introduce no change to the respective settings of the heritage assets.

6.5.26 Having regard to the statutory duties in respect of listed buildings and conservation areas in the Planning (Listed Buildings and Conservations Areas) Act 1990, and NPPF requirements in relation to listed buildings, structures and conservation areas, Officers are satisfied that no harm will arise to the nearby designated heritage assets through the delivery of the proposed scheme. It is considered that the proposed development is generally sympathetic to the form and scale of the surrounding context, including the nearby designated heritage assets (as

considered above), and the scheme is considered to accord with the aforementioned policies.

Public Realm

- 6.5.27 The proposal incorporates a comprehensive landscape and public realm strategy, as touched upon above and detailed further in the report. The proposed enhancements would be inclusive, attractive, well-designed and accessible with a fundamental focus on connectivity of routes both within and outside of the site. Furthermore, the aspect of the proposed buildings and provision of residential units on the ground floor would activate and define the public realm, providing appropriate levels of natural surveillance. The proposed works would provide street trees and soft landscape planting, which would also serve to support sustainable drainage measures and increase biodiversity. Appropriate street furniture is also proposed to improve pedestrian amenity and experience. These reasons, officers are satisfied that the proposed public realm improvements would meet the objectives of the relevant policies.

Access

- 6.5.28 The site currently lacks permeability primarily due to its current retail function as a purposeful destination rather than being an environment to dwell. The main route to the site is subservient to the roundabout along Northolt Road, and is not currently desirable for both pedestrians and cyclists. To enhance safety within the development car movements to the site are limited to the south and the car park entrance is located close to the main vehicular entrance to minimise vehicle movement within the site. Accordingly, the site is primarily pedestrianised except for managed servicing and emergency service access. This would be the main route into the development for pedestrians, cyclists as well. It is noted that this access, being primarily for servicing of the existing retail units is not designed for use by pedestrians or cyclists. As such, safety improvements to enhance the existing routes will be secured via Section 278 legal agreement in respect of highway works and through appropriate landscape strategies discussed below. The provision of pedestrian and cycle access from the Grange Farm Development via two main points either side of Plot 03 would also encourage wider permeability. One of these routes south of Plot 03 was secured as part of the consented Grange Farm scheme and the other, to the north is proposed as part of the current scheme.
- 6.5.29 Designated delivery/drop off and servicing zones are integrated into the street layout to facilitate this. The layout allows for emergency vehicle access directly on the streets, including via the Mews Street if necessary through the removal of bollards either end (through the use of fob key access). A segregated pedestrian and cycle route starts close to the existing petrol filling station east of the site in front of Plot 03 into the development.

Landscaping

- 6.5.30 The existing site is limited in terms of landscaping, characterised by hard landscaping and scrub boundaries. The landscape masterplan is proposed to stitch in the new residential spaces into the wider context and complement the emerging Grange Farm masterplan to the north. The approach integrates routes, wayfinding, character and biodiversity to deliver what is considered to be a high quality setting for the new homes. The masterplan principles include the creation of legible streets, playful spaces, active frontages and amenity, multifunctional spaces and green and blue networks. It is noted that the revised plans resulted in the adjusted of the original red line boundary which removed a large area of landscaping on the eastern boundary of the site. Whilst this is a considerable loss to the scheme, this was mitigated through the increase in play space, re-provision of allotment space and a clearer boundary hierarchy. Furthermore, given the overall enhancement to the existing urban context and minimal vehicle movement within the site, this change is not considered to compromise the overall high quality design aspirations of the scheme.

Public Spaces

- 6.5.31 In achieving a comprehensive and inclusive landscape strategy, consideration has been given to the approved Grange Farm masterplan. The Grange Farm masterplan creates a new community square with a variety of play and recreation spaces. The proposal seeks to complement and enhance this offer to create an extension to the regeneration of the area. Two key links either side of the Mews block (Plot 03) have been created to provide east to west (vice versa) movement across both the development site and Grange Farm. These 'arrival' nodes as well as the southern access area are characterised with a range of play space typologies including both urban and natural to encourage social activity within the shared street. Primarily the new public space at the heart of the scheme located at the centre point and is visible from all three blocks and Grange Farm. The main linear route via the main southern access provides a key vista and gives legibility to the hierarchy of routes. Orchard gardens are also proposed at the main arrival point comprising semi-wild and woodland planting to enhance biodiversity within the site. Linear gardens are proposed on the north west corner of the site to connect the allotment walks proposed at Grange Farm. Hard and soft landscape plans with detailed specifications of proposed planting and materials along with a management and maintenance strategy to ensure the longevity of the landscape proposals are considered necessary to safeguard the delivery of a high quality public realm.
- 6.5.32 In terms of boundary treatments, a combination of low brick wall and planted strips form the private gardens to the street, with integrated gates and bin/cycle storage. The car park boundary is also incorporated within the scheme through a series of raised planters, bench seating and visual and acoustic barriers (mainly for car park boundaries). This is particularly inherent in addressing the level changes adjacent to the Mews Street. Planting will also incorporate vehicle barriers and lighting bollards to create safe play and recreational space and allotment planters will form the edges to the new connections to Grange Farm as well as support the SUDs

strategy. The shared surface would be flush and cohesive as a single space open for users. Subject to conditions requiring details of all boundary treatments.

Private Spaces

- 6.5.33 The range and quality of private amenity spaces is considered to be high. Doorstep play is encouraged through the use of wide frontages and recessed entrances to provide shelter on arrival. The podium courtyards within Plot 01 are private and shared amenity for residents of this block. The orientation of these maximises the south western siting. Play space has been designed to be safe and accessible for all, ensuring a road safety compliant street network through low planting, defensible barriers and legible surfaces.

Children's Play

- 6.5.34 Policy S4 in the Mayors The Publication London Plan and policy DM28 require an on-site provision of facilities where a development would result in a net increase in child yield. Policy S4 requires at least 10 sqm of play space to be provided per child which would result in a requirement of approximately 694sqm. Applying the GLA Population Yield Calculator, the proposed development is expected to yield a total of 69 under 16's comprising 28 x 0-3 year olds, 28 x 4-10 year olds and 10 x 11-15 year olds. Based on the indicative child yield from the development, this would equate to a minimum requirement of 278 sqm of play space. The development proposes 630 sqm of play space.
- 6.5.35 The Council's Planning Obligations SPD, is informed by Harrow's PPG 17 Study and specifies that a standard needs to be set that is both aspirational and also achievable. For this reason, the quantity standard for children's play space within Harrow has been set at 4sqm of dedicated play space per child which would result in a requirement of 278 sqm. When assessed against the Council's own benchmark, the development would provide more than the required dedicated space equating to 630 sqm. The revised Landscape Strategy within the Design and Access Statement by Hawkins Brown Architects provides details of the proposed play strategy. The report identifies that the proposed development would provide play provision that would be integrated into the public and communal spaces. Although the scheme falls short of the Draft London Plan requirement it would exceed the local thresholds. Furthermore, the integration and improvements to connectivity between the extant Grange Farm scheme and the proposed development mean users of the proposed scheme can access the nearby amenity spaces (which exceeded threshold requirements for both Harrow and the GLA) at the time permission was granted (P/3524/16). The LPA consider the quantum of play space provided is acceptable for the reasons set out below.

Refuse Storage

- 6.5.36 The supporting Design and Access Statement (DAS) sets out the refuse arrangement for each plot. The plans show that each of the buildings will have its own dedicated refuse store. All of the refuse stores can be accessed by the residents from the core via the lobby and by refuse collectors directly from the street. Plot 01 has three cores and refuse collection points, Plot 02 has one and

Plot 03 has two. All communal bin stores would be located in proximity of the road ensuring the dragging distance between the door of the store and the kerb line is less than 10m as required by the Council's Refuse Collection Code of Practice. The quantum of residual waste and recycling waste bins has not been provided for each building these would need to be provided in accordance with the Council's Refuse Collection Code of Practice, which requires a provision of 1 large bin per 8 flats. A condition requiring the outstanding details is recommended.

External Lighting

- 6.5.37 In terms of external lighting, the applicant included a section relating to the proposed lighting strategy within the Design and Access Statement, which sets out that the external lighting would be designed to support the creation of a high quality public realm through safe, accessible and attractive streets and spaces as well as to protect biodiversity. Low level lighting is proposed for primary routes, to connect to external building entrances, bin and cycle stores. Opportunities to integrate concealed lighting into boundary treatments to light the surfaces along the paths and streets is also proposed. All luminance levels would need to be within the relevant recommended guidance. Whilst the strategy provides examples of luminaire types, the final equipment details and detailed external lighting designed would need to be secured by condition.

Fire Strategy

- 6.5.38 The applicant submitted a concept fire strategy report which demonstrates that fire strategy has been considered during design development. All individual units are proposed to be provided with individual Grade D Category LD1 automatic fire detection and alarm systems alongside the Category L5 alarms for the common corridors and plant rooms. This would support a smoke ventilation system and provide early warning to any occupants located within these areas. These would be designed, installed and commissioned in accordance with BS 5839-6. Horizontal and vertical escape routes for each block have been identified with the provision of firefighting lifts and minimum stair width of 1100mm, main entrances lobbies ventilated and sprinkler system for residential units. The Mayor under his Stage 1 response requested that a revised Fire Statement is produced which would accord with Policy D12 (part B, 1-6) of the Mayor's The Publication London Plan (2020). Although an updated Fire Strategy has been provided, the GLA have not provided further comments. To ensure that appropriate fire strategies are in place and in accordance with Policy D12 an appropriately worded condition is recommended.

Conclusion

- 6.5.39 In conclusion, the proposed development, subject to the imposition of appropriate conditions would achieve a high quality form of development which would be further enhanced by the landscaped strategy which will knit together with the wider masterplan. It is considered that the proposals would meet the high quality design and landscape aspirations in accordance with the policies listed under paragraph 6.6.1 of this appraisal.

6.6 Residential Amenity, Quality, Noise and Accessibility

- 6.6.1 The relevant policies are:
National Planning Policy Framework (2019)
London Plan: 3.5, 3.6, 3.7, 7.6 and 7.15
Harrow Development Management Local Policies: DM1, DM2, DM27 and DM28
Publication London Plan: D4, D5, D6 and D13

Residential Quality of future development

- 6.6.2 In addition to the above policies, the Mayor has published a Housing SPG (2016) which sets out the detailed guidance on a range of matters relating to residential quality, incorporating the Secured by Design principles, and these form the basis for the assessment below. The use of these residential unit GIA's as minima is also reiterated in Appendix 1 of the Residential Design Guide SPD. This is reinforced under policy 3.5 of the London Plan and policy D6 of the draft London Plan. Each of the key standards are appraised below.

Entrances and Shared Circulation

- 6.6.3 The Mayor's Housing SPG calls for entrances to be visible from the public realm and clearly defined. The residential entrances to the buildings would face the new streets within the development. They would be visible from and would help to activate the new public realm within the proposed development. The entrance lobbies to the proposed residential flats would be generously proportioned and in accordance with the Mayors Housing SPG, each building would be served by at least one lift and there would be a maximum of no more than 10 residential units per floor serving the core. The GLA noted in their stage 1 report that this would not accord with Standard 12 of the SPG, however given that all other plots would achieve the required 8 units per core and habitable rooms, on balance this is considered acceptable. The SPG also encourages communal corridors to receive natural light and ventilation where possible. All dwellings accessed via an internal corridor would receive some form of natural light and ventilation. Where possible gallery access to the proposed residential units has been provided namely in Plot 03 which are exposed to open air but covered by the decks above. The corridors are not excessively long. In this regard this element is considered acceptable.

Internal Space Standards

- 6.6.4 The minimum space standards are set out at Table 3.3 of the London Plan (2016) and are reproduced within the Mayor's Housing SPG. The submitted Design and Access Statement details the proposed unit typologies which would be provided within Plots 01, 02 and 03. All of the flats within the proposed development would meet or exceed the London Plan minimum space standards. The development would also achieve the minimum floor to ceiling height of 2.5 metres as required by the Housing SPG. The submitted drawings show that the proposed layouts would make reasonable provision for the accommodation of furniture and flexibility in the arrangement of bedroom furniture.

6.6.5 The SPG requires built in storage space to be provided in all new homes. The proposal is shown to provide an adequate level of storage space for each of the units. To ensure compliance with this standard, it is considered necessary to secure this as a condition of any planning permission. The SPG also seeks adequate space and services to work from home. An indicative furniture layout is set out on the application drawings and this demonstrates that all of the flats would have space for a table. As such, each flat would have space flexible for dining and home study/work activities.

Access

6.6.6 Policy 3.8(c) of the London Plan relating to Housing Choice, requires 90% of homes should meet building regulations M4 (2) – ‘accessible and adopted dwellings’. Policy 3.8(d) will require 10% of new housing to meeting building regulations M4 (3) – ‘wheelchair user dwellings’. The proposals would provide 10% of residential units as wheelchair adaptable units and as such the proposals would be compliant with the required building regulations. A condition is attached to ensure compliance with the regulations.

6.6.7 The submitted applications documents confirm that 22 of the proposed units would be in accordance with M4(3) ‘Wheelchair user dwellings’ and the remaining units would comply with M4(2) ‘accessible and adaptable dwellings’. A condition is recommended requiring the internal layout of the buildings and its external spaces to meet these standards. Subject to this condition, officers consider that the proposed development would be acceptable in this regard.

Private open space

6.6.8 The SPG requires a minimum of 5sqm per 1-2 person dwelling and an extra 1sqm for each additional occupant. In the case of the studios, 1 bed and 2 bed units, these units would have a private balcony space which would exceed the required standard recommended in the SPG. All units are provided with adequate private amenity space in form of either balconies or terraces. Many of the ground floor units which are served with private garden spaces exceed the minimum threshold. This aspect of the proposal is therefore considered to be acceptable.

Privacy

6.6.9 The SPG calls for habitable rooms within dwellings to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces. Paragraph 2.3.36 of the SPG refers to yardstick separation distances of 18-21 metres between facing habitable room windows.

6.6.10 As a high density scheme there would inevitably be some overlooking relationships between homes within the development. Plot 01 generally provides adequate separation distances between habitable rooms. Although the 5 storey element and part of the 6 storey element facing Plot 02 has a reduced separation distance between 14-17m, these distances are common within higher density developments and would not warrant refusal. Although Plot 01 is only separated from the proposed Grange Farm block to the rear by 11.5m at its closest point, this

block has only received outline consent, with plot allocation and indicative internal layouts only. However, any potential overlooking issues have been overcome through the design process by providing deck access along the northern boundary rather than habitable spaces. Terraces and balconies are also oriented to face south, away from the Grange Farm development. This would ensure any forthcoming reserved matters application for the approved block would not be compromised as a result of the development. Some overlooking may occur between the 6 storey elements of Plot 01 and Plot 02 on the north eastern corner given the reduced separation distance of approximately 12m, however such distances are considered appropriate for this type of development and would not result in an unacceptable loss of privacy to future occupiers. All other separation distances would comply with the Mayor's SPG.

- 6.6.11 A number of the balconies and private gardens throughout the development would be sited adjacent to each other, or adjacent to neighbouring windows. However, as noted above the level of overlooking between the balconies would be an acceptable condition in regard to the high density scheme such as this.
- 6.6.12 As noted under the character and appearance section of this appraisal, the ground floor gardens and those units fronting the podium level would maintain sufficient defensible zones from the public realm to ensure the privacy of the occupiers of these units. Appropriate boundary treatments for all ground floor private amenity spaces will be secured by condition.
- 6.6.13 On balance, having regard to the high density nature of the proposal, which is consistent with the need to make effective use of this accessible edge of town centre site and recognising that those choosing to live in a high density development are likely to have different expectations about privacy, it is considered that the relationships between residential buildings would secure a standard of privacy that would be commensurately high for the vast majority of future occupiers.

Dual Aspect

- 6.6.14 The SPG seeks to avoid single aspect dwellings where: the dwelling is north facing (defined as being within 45 degrees of north); the dwelling would be exposed to harmful levels of external noise; or the dwelling would contain three or more bedrooms. The definition of a dual aspect dwelling is one with openable windows on two external walls, which may be opposite (i.e. front & back) or around a corner (i.e. front and side) and the SPG calls for developments to maximise the provision of dual aspect dwellings.
- 6.6.15 The applicant has sought to exploit opportunities where possible to create dual aspect dwellings (up to 78% of the total units). While this number is relatively low, it is noted that there are no single aspect, north-facing units proposed. Furthermore, as the scheme has been designed with a pedestrian / cycle / play street through its centre, meaning that single aspect units that overlook this street are still provided with a relatively quiet aspect. It is therefore considered that the single aspect nature of this development would be off-set by the good internal layout and circulation for each of the units.

Noise

- 6.6.16 The SPG seeks to limit the transmission of noise between flats, and from lifts/communal spaces to noise sensitive rooms, through careful attention to the layout of dwellings and the location of lifts.
- 6.6.17 The majority of units within the blocks would not induce any noise transmission issues resulting from poor vertical stacking arrangements. In the case of the cores to the individual buildings a number of habitable rooms would be sited adjacent to the lift shaft. Whilst this is not ideal, in most cases due to site constraints, this is unavoidable. However, having regard to the fact the development would be a new build and therefore would be required to ensure that sufficient noise insulation is provided to meet Building Regulations. When considered against the requirement for thermal installation also, it is considered that sufficient level of noise mitigation would be achieved to provide a good level of accommodation for future occupiers.
- 6.6.18 Policy D13 of the The Publication London Plan states that the Agent of Change principle places the responsibility for mitigating impacts from existing noise (and other nuisance-generating activities or uses) on the proposed new noise-sensitive development. Furthermore, it states that development proposals: should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances; explore mitigation measures early in the design stage, with necessary and appropriate provisions, including ongoing and future management of mitigation measures secured through planning obligations; and separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, and insulation and other acoustic design measures.
- 6.6.20 A Noise Assessment has been undertaken. This calculates suitable glazing and ventilation specifications required for the development to be acceptable in terms of noise. Due to the proximity of the neighbouring industrial uses located to the west of the site, and the introduction of residential land uses within the proposed development, Policy D13 is applicable to the proposed scheme. The application sets out that this principle has been considered in the design development of the proposal, with units located within Plot 1, at the closest point, benefiting from triple aspect as well as two primary frontages facing away from the industrial estate. Furthermore, the proposals incorporate acoustic fencing along the western boundary, and the incorporation of solid balconies screening off at least 1.2 metres to ensure that the proposed amenity spaces would be of a good quality in respect of the acoustic environment.
- 6.6.21 The Noise Assessment states that the site is considered a 'low risk' when assessed against the ProPG guidance. Noise associated with the existing commercial use (Waitrose), such as fixed plant and equipment would result in low impact in line with BS4142:2014 guidance. The report concludes that subject to the recommendations included the site would result in good internal living conditions in respect of noise for future occupiers. A condition to safeguard the implementation of the mitigation measures proposed is therefore required.

Daylight and Sunlight

- 6.6.22 The SPG (2016) states that “All homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen and dining spaces should preferably receive direct sunlight” (standard 32). Supporting paragraph 1.3.45 outlines that “An appropriate degree of flexibility needs to be used when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties as well as within new developments themselves. Guidelines should be applied sensitively to higher development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and the scope for the character and form of an area to change over time.” Local Plan Policy DM1 includes among its amenity considerations the adequacy of light and outlook within buildings (habitable rooms and kitchens).
- 6.6.23 The applicant has submitted a detailed assessment of the effects of the development on the daylight and sunlight amenity to occupiers of neighbouring residential properties; on transient and permanent overshadowing to existing amenity areas in the vicinity of the site. This is based on the Building Research Establishment’s (BRE) ‘Site Layout Planning for Daylight and Sunlight: A Good Practice Guide’. The assessment considers the quality of sunlight and daylight to the new residential dwellings. Two principal measures of daylight for assessing impact on neighbouring properties are used, mainly Vertical Sky Component (VSC) and No Sky Line (NSL). The methodology adopted is considered to be appropriate.
- 6.6.24 For the purposes of measuring the performance of habitable rooms within the proposed development, the assessment uses the Average Daylight Factor. This method measures how much sky can be seen from the window and converts the results into a percentage of annual probable sunlight hours received. The BRE guidelines recommend that ADF values of 1% should be achieved in bedrooms, 1.5% in living rooms and 2 % in kitchens. In assessing daylight to combined living/ kitchen/ dining rooms, where kitchen areas are located to the rear proportion of such rooms and would receive lower levels of daylight, these have been omitted from the calculations and the assessment is based on the habitable living area only. Hence an ADF target of 1.5% has been adopted.

Impact on consented Grange Farm Development

- 6.6.26 The northern part of Plot 01 and Plot 03 would abut residential blocks approved as part of the Grange Farm redevelopment. As the Grange Farm Estate only has outline consent there is no detailed design of the interior spaces or size of windows. An ADF assessment would normally be considered when these detailed design elements are known, however these details are not known, a Vertical Sky Component (VSC) was undertaken of the facades of the property, most likely to be impacted by the proposed development. The study concludes that at ground level, the façade can achieve at least 15% VSC as a result of the Northolt Road scheme built in the emerging context and as such the requisite Average Daylight Factor

(ADF) targets could be met, subject to appropriate design of the layouts, façade and balcony arrangement. As such, it is considered that both the proposed development and Grange Farm Estate schemes could, through detailed design, achieve adequate daylight levels that conform with current BRE guidelines.

Impact to future occupiers of the proposed scheme

- 6.6.27 In terms of sunlight, 43% of windows would meet the BRE Guidance for APSH. The lower compliance rate is mainly due to the northerly aspect of these rooms. However, on balance, having regard to the wider scheme benefit delivered and the overall quality of the units in terms of their size and internal configuration, the proposal is considered to be acceptable.
- 6.6.28 The sunlight levels to external courtyards, boundary with Grange Farm, shared surface and private gardens have been tested against the BRE guidelines. The results show that on the 21st of March that all outdoor spaces would achieve more than 50% of direct sunlight for a minimum of 2 hours. When assessed for 21 September, all of the external courtyards would receive more than 50% sunlight for a period of 2 hours. In June the analysis shows all external areas would receive over 90% of direct sunlight. This demonstrates that each of the courtyards will receive good sunlight amenity throughout the summer months when they are most likely to be used.
- 6.6.29 In conclusion, Officers consider that whilst clearly it is desirable for a new development to achieve 100% compliance with the recommendations of the BRE guidelines, it is inevitable that a site of the proposed density will require consideration of some compromise between daylight/sunlight, the provision of highly valued residential amenity space (balconies) and other planning considerations that may influence the site layout and orientation of buildings. It should also be emphasised here that the recommended BRE guidelines for daylight and sunlight – whilst a valuable tool for measuring the degree of daylight and sunlight that would be achieved – do not form a part of the adopted development plan. Rather, Local Plan Policy DM1 requires a high standard of amenity and undertakes to have regard to a range of amenity considerations which includes, but is not limited to, the adequacy of light and outlook. Thus, it is concluded that the proposed development would achieve above the recommended BRE standards, as a whole and is therefore acceptable.

Impact on Surrounding Residential Properties

Impact to daylight and sunlight

- 6.6.30 Residential properties nearest to the site is the existing Grange Farm Estate comprising 68-73, 74 and 74 Osmond Close and 64-72, 73-81, 82-90, 91-99, 100-108, 109, 110, 111-116, 117 and 118 Wesley Close. In relation to sunlight, the report concludes that the proposal would accord with default BRE guidance and all neighbouring properties will continue to receive excellent sunlight amenity after the development. Generally daylight impingements would be small although there are some exceptions from the current BRE daylight guidance to a number of properties. However, this is because the existing massing on site is modest and

there are large vacant areas. As such, some noticeable reductions in daylight amenity would be inevitable with any scheme which optimises the potential of a site. Nevertheless, the consultants conclude that the amenity to all surrounding properties would remain good post development and compare favourably with appropriate urban daylight levels.

Visual Impact, Outlook and Privacy

- 6.6.31 Undoubtedly, the proposed development would represent a distinctive new addition to the area. It would, by reason of its height, be visible to occupiers of premises over a wide area. However, the impacts would be most pronounced for the occupiers of adjoining sites. The existing surface car park provides an unobstructed view in the outlook of the residential units and dwellinghouses that surround the application site. In this context, the introduction of development on the site (especially at the scale proposed) would result in a significant change in the outlook and associated amenity benefits currently experienced by the neighbouring residential occupiers. However, being able to see a building is not of itself indicative of visual harm, and it is therefore necessary to consider in greater detail the specific relationships that would result between the proposed buildings and structures and the nearest affected neighbouring properties.
- 6.6.32 The nearest properties are located at Wesley Close which are approximately 18m away from the site / development. Evidently, at six storeys, the proposed buildings would be large, and would appear as such from the rear gardens of the respective residential properties. While the view would be softened through an extensive landscaping strategy, it should be noted that these properties form part of the emerging context albeit latter phases of the Grange Farm redevelopment which will see the construction of blocks up to 7 storeys high. Furthermore, the change in levels (by approximately 3m) would reduce the visual impact of the development and would positively mitigate the perception of bulk and massing, albeit in a modest way. All other uses in the immediate vicinity are commercial uses and whilst the development would be visible from residential properties which surround, it is considered that the visual impact of the development would be in keeping with the emerging scale and density of the wider area.
- 6.6.33 In terms of privacy and overlooking impacts, it is noted that the Mayor's SPG refers to separation distances of 18-21 metres between facing elevations with habitable rooms as being 'useful yardsticks' for visual privacy. The separation distances would therefore be sufficient to mitigate against any intervisibility between the residential buildings. Whilst recognising that the adjacent occupiers would experience a visual change, taken together with the separation distances described above and having regard to the need to make effective use of this allocated site, officers consider that the resulting visual and privacy impacts would be not be unacceptable.

Conclusion

6.6.34 In conclusion, based on the above considerations, and the imposition of appropriate conditions, it is considered that the development would achieve a high standard of quality of accommodation for future occupiers in line with the guidance and policies noted under paragraph 6.7.1 above.

6.7 Traffic, Parking, Access, Servicing and Sustainable Transport

6.7.1 The relevant policies are:

- National Planning Policy Framework (2019)
- London Plan: 6.1, 6.3, 6.9, 6.13
- Publication London Plan: H15, T2, T4, T6, T6.1, T6.3 and T6.5
- Harrow Core Strategy (2012): CS1R
- Harrow Development Management Local Policies: DM42, DM43 and DM44

Transport Impact

6.7.2 This location has a public transport accessibility level (PTAL) of 4 which is considered to be good. There are numerous buses within a 400m walk and South Harrow Underground station is also a similar distance from the site. Northolt Road has a long retail parade functioning as a high street with various food stores, restaurants and other local amenities.

6.7.3 A Transport Statement prepared by Ardent Consulting Engineers was submitted in support of the application. The transport assessment states that Census 2011 records show that for flats within the Roxbourne ward, there is an average of 0.6 vehicles per household. Whilst this site does not sit within a CPZ it does border with both zones M (operating Mon-Sat 10-11am and 2-3pm) and M1 (operating Mon-Sat, 10am to 9pm). Residents of this development will not be eligible for permits however they would be able to park in the zone outside of the hours of operation.

Car Parking Provision

6.7.4 For the application site (outer London and PTAL 4), The Publication London Plan sets a maximum residential parking provision of 0.5 car parking spaces per unit. The proposal includes car parking for 67 vehicles which amounts to 0.35 spaces per household. Of these 7 would be disabled (representing 3% of the total number of units in line with the Policy T6.1 of The Publication London Plan. No visitor parking is provided. The proposal would not result in a loss of any of the existing Waitrose car parking spaces. Although this provision is low, both Council Highways Officers and the GLA consider that this would help to encourage more sustainable travel. The Highways Officer states that car ownership would need to be discouraged and good access to good quality pedestrian and cycle facilities would be required. This is also encouraged by the GLA within their Stage 1 response. The applicant has confirmed several improvements to the existing service road access point by way of S278 legal agreement discussed later in this section (paragraph 6.7.22).

- 6.7.5 The parking survey summary indicates that parking demand is at its highest overnight although there is still capacity. On this basis, the proximity of the site to the zone M CPZ areas means that should there be insufficient capacity within the residential car park, it is likely that there would be overspill on to the surrounding roads. As residents are not eligible for parking permits, in order to achieve the low car intentions and to prevent harm to the highway in the form of parking congestion, it is recommended that further studies are undertaken by the Council following occupation of the site with a view to introducing longer hours of operation of Zone M, should this be necessary. This will be secured by way of legal obligation.
- 6.7.6 The Highways officer considers the car parking design and management plan (CPDMP) is acceptable; but would require a detailed document to be secured by condition. This needs to set out where the 3% disabled parking spaces are within the car park and where a further 7% of standard bays are located that can be converted should demand increase and how this will be undertaken. Additionally, it should set out how the passive EV charge points will be made active should demand increase. The intentions at paragraph 4.3 of the CPDMP need further consideration; as not all blue badge holders would require a wheelchair accessible home therefore, it may not be appropriate to restrict the provision of disabled parking spaces on this basis as the type of accommodation a person occupies doesn't necessarily reflect their parking needs. The outline construction logistics plan is acceptable. A detailed plan must be secured by pre-commencement condition. This must follow TfL/CLOCS guidance.

Access and Street Layout

- 6.7.7 The development results in a significant reduction in trips which is to be expected following the removal of retail outlets. The low parking provision also helps to reduce vehicular activity further. The revision of the red line boundary during the application process on the eastern side of the site at the main retail park entrance has resulted in a change to a single lane from the roundabout. The development site has rights over this access and as such this route would also form an emergency access route to the site. This LPA Highways Officer considers the reduction in the number of lanes a positive for pedestrians using the supermarket in particular, as it would mean less opportunity for conflict given that all vehicular movements are concentrated into a single area.
- 6.7.8 Although it is noted that as a result of the revisions no dedicated pedestrian / cycle routes would be included to access the development from the northern points, routes are available via the Waitrose car park and measures would be secured to encourage access via the main southern route. As such, key routes linking the development to Grange Farm would not be compromised. Given the positive improvements to the safety of this access through the provision of a single access it is considered on balance that this route would be acceptable. To ensure suitable pedestrian/cycle safety a cycle gate is proposed at the eastern end of Plot 03 (Mews), to ensure cycles slow down before entering the access road.

- 6.7.9 The Transport Consultant has confirmed that the main desire paths to and from South Harrow on Northolt Road to the south of the site would be via the main southern access point. Furthermore, to encourage sustainable travel within and beyond the development a number of improvements to the southern access (currently used only as a service route) would be secured via Section 278 works and which have been confirmed by the Council's Highways Officers, these include: Improvements and potential widening to the footway on the southern side of the access road leading to the site; provision of a zebra crossing for pedestrians linking the footpath to Stanley Road; improved lighting to the footway link to Stanley Road and a provision of a car club space. The implementation of these measures would ensure the safety of all users using this route.
- 6.7.10 The Active Travel Zone (ATZ) assessment reviewed the connections to key destinations and identified that there are no significant issues meaning that pedestrian access is good. Improvements to lighting could enhance the cycling connection to the nearest cycle route in Roxeth Green Avenue; this can be explored by the Council, should the application be approved, particularly to consider connections to other nearby routes. The Highways Officers have confirmed that these discussions could take place should the application be approved. The GLA requested confirmation regarding cycle routes to the wider area, the applicant has confirmed that the internal layout of the site has been designed to allow future links to cycle routes if/when these are available, and further detail on any off-site improvements required to link to any cycle infrastructure in the vicinity would be picked up as part of the Section 278 agreement.
- 6.7.11 Swept-path analysis has been undertaken of the internal highway network and parking areas with a standard design vehicle. The TA contends that a Stage 1 road safety audit was undertaken on the proposed highway layout and no major concerns were highlighted. The GLA requested that a collision analysis should be undertaken to ensure that the scheme aligns with the Mayor's Vision Zero Action Plan. The applicant has confirmed that the Road Safety Audit recommendations largely related to issues which would be picked up as part of the detailed design and would be included at that stage as well as being considered as part of the Stage 2 Safety Audit. This will be secured by condition. However, given that it is anticipated that the proposed internal roads would have relatively low vehicle movements per hour and managed through the use of bollards and fob access it is not considered that the proposed development would raise significant safety concerns.

Cycle & Motorcycle Parking

- 6.7.12 Cycle parking requirements are based on the minimum standard set out under policy T5 of the draft London Plan. The proposal would provide 331 long stay cycle parking and 6 short stay cycle parking. 5 per cent of the total long stay provision will be in form of wider spaced Sheffield Stands and adapted cycles; 20% of spaces within the standard Sheffield Stands and remaining 75% provided as tiered-stands, which will be gas assisted.

- 6.7.13 All long stay cycle parking will be provided in secure and covered locations in line with policy T5 of the draft London Plan and the London Cycling Design Standards. All short stay cycling will be situated within the public realm in visible, convenient locations, which will be step free and within 15m of the main entrance of their allocated residential core or non-residential unit. Confirmation and details of appropriate cycle stands and adequate space within the designated areas would be required to ensure compliance with The Publication London Plan (2020) and London Cycle Design Standards. A condition is therefore recommended.
- 6.7.14 Policy DM42 sets out that 1 motorcycle parking per 20 car parking spaces should be provided to all developments with more than 10 car parking spaces. Based on the quantum of parking proposed, this would require a quantum of 3 motorcycle spaces to be provided for this development. The proposed ground floor plan indicates that a provision of 4 spaces could be accommodated. The exact detailing of the proposed motorcycle can be secured by condition spaces to ensure these are adequately sited and provided for.

Travel Plan

- 6.7.15 The applicant has submitted a framework travel plan in support of the residential element of the proposed development. This is yet to be reviewed by the Council's Travel Planner. If any amendments are required these will be sought prior to any formal decision being made. Notwithstanding this, a detailed travel plan for the development would be secured through the section 106 agreement along with any associated cost for the monitoring these travel plans, if such has not been already secured under the principle section 106 agreement relating to the wider masterplan site.

Car Club

- 6.7.16 The applicant's TA sets out that there would be no car club provision although there are two car club vehicles stationed within walking distance to the south of the site. The applicant states that residents will be made aware of the benefits of membership to the established neighbourhood car club network. However, further discussions with the Council's Highways Officer resolved that a car club space should be provided which would further encourage sustainable travel for future occupiers. This was agreed by the applicant and will be secured by way of legal agreement, details of which finalised during the drafting of the Section 106 to ensure uptake of this space.

Deliveries and Servicing

- 6.7.17 As noted the development is likely to result in a significant reduction in trips given the loss of the retail units. It is still considered that up to 35 servicing trips per day associated with this development would be expected. The development proposes a parcel drop off/locker facility which is considered to be acceptable as it would reducing the likelihood of repeat journeys through missed visits. A delivery and servicing plan has been provided and this sets out how these visits are intended to be managed.

- 6.7.18 Dedicated servicing areas are provided close to cores/bin stores on site, with delivery and service vehicles able to pass whilst a refuse vehicle is waiting. The Mews block (Plot 03) being wholly pedestrianised (with the exception of emergency access) would have refuse stores located to the northeast with waste holding areas close to residential units to achieve suitable carry distances. The Delivery and Servicing Management Plan states that an onsite management company would assist with deliveries and servicing.
- 6.7.19 It is noted that the main access to the site would cross paths with the operations of the Waitrose Store. The Transport Consultant has confirmed that servicing for Waitrose does take place from the southern access road, but entry/egress are in forward gear, and suitable visibility splays are achievable. Furthermore, the Transport Consultant states that low numbers of delivery/servicing movements take place at the Waitrose site which would limit the opportunity for conflict and as such this would not compromise the existing operation of the store or the future safe accessibility to the proposed development, particularly in the context of the Section 278 works proposed. On this basis, it is considered that this element would be acceptable subject to a condition securing the assessment and measures outlined in the submitted delivery and servicing plan.
- 6.7.20 Emergency Vehicles has been considered in the design of the proposed development. Fire tender vehicles are able to stop within 18m of each external riser inlet and clear routes have been provided to ensure unobstructed access in the event of an emergency.

Highway Works and Mitigation

- 6.7.21 The proposed off-site highway works would consist of:
- Improvements and potential widening to the footway on the southern side of the access road leading to the site;
 - Car club space provision;
 - Provision of a zebra crossing at grade for pedestrians linking the footpath to Stanley Road; and
 - Improved lighting to the footway link to Stanley Road.
- 6.7.22 As detailed above, various strategies are proposed to mitigate the impacts of the proposed development. In addition to the provision of a designated the cycle stores for the proposed residential development, a Residential Travel Plan would be secured through a section 106 Planning Obligation. Furthermore, the legal agreement would also secure further studies and a contribution for the implementation of measures (should the need for specific CPZ measures be identified). Officers consider that these measures would serve to better implement the modal shift while ensuring the proposal does not have a detrimental impact on the safety and functioning of the highway.

Conclusion

6.7.23 In conclusion, it is considered that the proposed development, subject to the imposition of appropriate conditions and/ or section 106 obligations would have no adverse impact up parking or highway safety and consequently would give rise to no conflict with the policies stated under paragraph 6.7.1 above.

6.8 Development and Flood Risk

6.8.1 The relevant policies are:

- NPPF: Chapter 14
- London Plan: 5.12 and 5.13
- Harrow Core Strategy: CS1 U
- Harrow Development Management Local Policies: DM9, DM10 and DM12
- Publication London Plan: SI 12 and SI 13

Flood Risk

6.8.2 The applicant submitted a Flood Risk Assessment (FRA) for this site. The entirety of the site and surrounding areas are shown to be within Flood Zone 1 i.e. land having a less than 1 in 1,000 annual probability of fluvial or tidal flooding. The FRA confirms that there is negligible risk of tidal flooding. However, a small portion of the eastern part of the site is identified within surface water flood zone 3a & 3b according to the Council's surface water flood maps. There is also a piped watercourse located within the site. Part of the site is therefore at a highest risk of flooding.

6.8.3 An FRA was submitted in support of the application and has been reviewed by the Council's Drainage Authority and they requested further information all of which were supplied by way of Flood Risk addendum. The updated information included:

- calculations for volume of compensation storage required;
- location of proposed CFS on plan
- cross section of the proposed compensatory flood storage with levels of the existing and proposed / lowered ground level in relation to the finish floor level.
- Detailed floor mitigation measures taking into account the depth of flooding.
- Emergency planning information
- Permeable paving;
- Drainage strategy; and
- Further details relating to the impact on the piped watercourse.

6.8.4 It is noted that there is a piped watercourse which cuts across the entire retail park and thereby part of the development of the site. The original design included with the Flood Risk Proposal showed all buildings greater than 5m from the culvert, however, did show both permeable paving and the attenuation crates 3-5m from the culvert. To avoid any conflict these, have both been moved so they are outside the 5m easement to the culverted watercourse, even with the survey provided.

The FRA confirms that any planting within the vicinity of the culverted watercourse will be within raised planters or trees to avoid roots impacting the culvert.

- 6.8.5 In response to the above, the applicant's Drainage Consultant has provided a Technical Design Note in response to the above LBH comments, which sets out that the proposed surface water drainage system for the site already provides an appropriate form of surface water 'compensatory flood storage', with no further compensation therefore considered necessary. Furthermore the proposals would include 'rain gardens' and other soft landscaping which will provide additional form of surface water 'compensatory flood storage'. The provision of a surface water drainage system designed to ensure there is no on-site water flooding post development would negate the need to raise floor levels 300mm above the flood level.
- 6.8.6 The Council's Drainage Authority confirms that points addressed in the addendum are sufficient subject to conditions requiring full design details of escape route (an alternative route to the north should be marked on plan) and watercourse protection condition (discharging surface water to the watercourse which requires Council consent).
- 6.8.7 Subject to these conditions and given that Mayor's Stage 1 response raises no concerns with the submitted FRA the proposal is considered to satisfy the requirement of the policies set out under paragraph 6.10.1 above. In addition, the

Drainage Strategy

- 6.8.8 Policy 5.13 requires a surface water drainage network to utilise sustainable urban drainage techniques, discharging surface water at greenfield runoff and managing surface water as close to source as possible in line with the drainage hierarchy set out under this policy. The applicant has submitted a Drainage Strategy (DS) which has been developed in accordance with policy 5.13 of the London Plan and policy SI 13 of the draft London Plan. 6.11.4
- 6.8.9 The DS in line with the hierarchy will include storage water for later use by way a planting strategy with water butts at grow areas and opportunities for water run off to provide irrigation to podiums and private gardens, permeable surfaces, proprietary below ground attenuation which supports the permeable surfaces and soft landscaping and living roofs designed to work with PV array. The EA's Surface Water Flood Risk mapping shows that majority of the site to be at 'low risk' of surface water flooding and this is reiterated within the FRA. The aforementioned SUDS strategy can be summarised below:
- Living roofs
 - Tree pits
 - Water butts
 - Geo cellular storage; and
 - Permeable paving.

Conclusion

6.8.10 It has also been recommended that details of the foul water disposal system be controlled by condition. Through such controls it will be possible for the Council to ensure that separate surface water and foul water drainage systems are implemented, reducing the risk of foul water flooding and water contamination. The Mayor's Stage 1 response makes no comments on the flood risk element of the scheme. Accordingly, subject to conditions, the proposal would accord with the relevant policies in this regard.

6.9 Ecology and Biodiversity

6.9.1 The relevant policies are:

- National Planning Policy Framework
- London Plan: 7.19
- Harrow Development Management Local Policies: DM20 and DM21
- Harrow and Wealdstone Area Action Plan: AAP12
- Publication London Plan: G6

6.9.2 The applicant has submitted a Preliminary Ecological Appraisal in respect of this application. This notes that the site is not designated for its nature conservation value and its not lie within the impact risk zone of Ruislip Woods SSSI. As such it is considered that the site is located sufficiently far from any priority habitat areas and designated conservation sites to conclude that the proposal would have no direct impact on these.

6.9.3 The Council's Biodiversity Officer has reviewed the information and considers the submitted Preliminary Ecological Appraisal (PEA) to be satisfactory. The site is within an area that is generally deficient in opportunities for access to nature but lies within 2 kilometres of a number of local wildlife sites including the extensive Harrow of the Hill Borough Grade 1 SINC. The PEA does not consider the site within the context of this wider local ecological network nor does it give consideration to the Mayor's Urban Greening Factor (although this is addressed within the Design and Access Statement). There are a number of concerns raised by the Biodiversity Officer in relation to the information supplied in relation to the exact amount of net biodiversity gain. However, as outlined within the PEA a number of recommendations have been made within the PEA to address this including:

- Native tree and shrub planting;
- Inclusion of green roofs (revised proposals include on all blocks);
- Bat boxes; and
- Inspect boxes.

6.9.4 Whilst the Council's Biodiversity Officer has acknowledged the above conditions have been outlined to make the scheme acceptable in planning terms, by ensuring that it will have a positive impact on biodiversity to ensure that the applicant outlines and commit to the implementation of detailed proposals in this regard.

Conclusion

6.9.5 Subject to the imposition of the conditions recommended above, it is considered that the proposal development would meet the aspirations of the policies listed under paragraph 6.9.1 above.

6.10 Sustainability and Climate Change Mitigation

6.10.1 The relevant policies are:

- National Planning Policy Framework
- London Plan: 5.1, 5.2, 5.3, 5.4A, 5.7, 5.9, 5.10, 5.11, 5.15, 5.18, 7.6 and 7.7
- Harrow Core Strategy: CS1 T
- Harrow Development Management Local Policies: DM1, DM12, DM13 and DM14
- Publication London Plan: D7, D8, G5, S1 2, SI 3, S1 4, SI 5 and SI 7

Energy and Sustainability

6.10.2 The overarching target for development in The Publication London Plan (2020) is for major developments to be net 'zero-carbon', with this preferably achieved on site. A minimum on-site reduction of at least 35 percent beyond Building Regulations is required for major development. Where it is clearly demonstrated that the zero-carbon cannot target cannot be fully achieved on-site, any shortfalls should be provided through a cash in lieu contribution to the Council to undertake carbon emissions reductions elsewhere in the borough. The policy seeks to reduce reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy of 'be lean; be clean; be green; and be seen'. The applicant has submitted an Energy Strategy Report (Dated 12th June 2020).

6.10.3 The Energy Strategy sets out carbon savings beyond Part L of the Building Regulations. The Energy Strategy sets out the energy hierarchy as detailed within The Publication London Plan (2020) being; Be Lean, Be Clean, Be Green and Be Seen. This does detail that the proposed development would achieve 9% savings through energy efficiency measures. However, policy SI2 (Minimising greenhouse gas emissions) The Publication London Plan (2020) requires 10% to be achieved. Therefore there is minor non-compliance with this requirement. However, it is noted that the overall saving would be 43% on site which is in excess of the required on-site savings of 35%. Therefore, and notwithstanding the minor non-compliance, the proposed development would achieve a satisfactory on-site savings for a residential development.

6.10.4 The applicant notes that there is a Combined Heat Pump unit within the permitted Grange Farm scheme, which is directly adjacent to the application scheme. The permitted Grange Farm energy centre would be delivered in Phase 2 of that development and is expected to be operational in 2024. By reason of this, the submitted energy strategy proposes that the Northolt Retail Park redevelopment connects the permitted energy centre within the Grange Farm development. The applicant has proposed an interim strategy to be utilised until such time (likely 2024) as the development is able to be connected to the Grange Farm heat

network. This approach is supported by Policy S13D(a) and is therefore encouraged and will be secured by way of condition. Evidence of discussions between the applicant and the network provider at Grange Farm have been submitted which suggest that a connection between the two sites would be feasible. The GLA have also suggested a condition is secured should the connection to the Grange Farm district heating network not be achieved within 5 years of occupation of the development to the temporary gas boiler energy centre proposed with a LZC heating technology that will meet the 35% on-site carbon reduction target for the development.

- 6.10.5 The GLA reviewed the energy strategy and provided their comments as part of the Stage 1 response. Further information was required in respect of a number of elements of the energy strategy to ensure compliance with the London Plan and Mayor's Publication London Plan (2020). This included information in relation to the decarbonisation strategy, Be Clean, Be Lean and Be Green elements, carbon performance and offsetting. Detailed technical comments in respect of energy have been circulated to the Council and applicant under a separate cover to be addressed in their entirety. Following the submission of further details the GLA notes: "The energy strategy is generally compliant with the London Plan policies. The carbon dioxide savings meet the on-site target set within the London Plan for domestic uses, however, the applicant is required to submit the additional information, which has been requested below. The applicant will be expected to review the 'Be seen' energy monitoring guidance early in the design process to ensure that they are fully aware of the relevant requirements to comply with the 'be seen' policy. A commitment should be provided that the development will be designed to enable post construction monitoring and that the information set out in the 'be seen' guidance is submitted to the GLA's portal at the appropriate reporting stages. A revised Energy Strategy will be requested to resolve outstanding matters as suggested by the GLA. Furthermore, post construction monitoring would be secured by way of legal agreement.
- 6.10.6 As the development would not be able to achieve the 'zero carbon' requirement on site, the remaining 131 of carbon would be offset at the current GLA rate of £1,800 per tonne (£60 per tonne / year x 30 years), equating to a contribution of circa £237,600 (note: The higher rate is likely to apply given the status of the Publication London Plan (2020). Subject to appropriate conditions and the necessary planning obligations, the proposal is acceptable in this regard.
- 6.10.7 Given the above, it is considered that the proposed energy strategy follows the energy hierarchy as required by the London Plan. It achieves greater on-site carbon reductions than the minimum 35% required under the London Plan (56.4% residential / non-residential). The proposed connection to an existing (under construction) CHP-led heat network is considered acceptable given the history of the site and its ongoing development. Solar PV as a form of renewable energy is considered appropriate to the site. Any remaining residential carbon emissions will be offset by way of a monetary contribution, secured through s106 agreement. Implementation of the energy strategy should be secured by way of condition, with the development to be implemented 'generally in accordance with' the strategy to allow some flexibility as the scheme progresses through detailed design and construction phases.

Water Efficiency

- 6.10.8 The Energy and Sustainability Statement also outlines several broader sustainability measures, including water efficiency. In this regard, it proposes that all dwellings will be designed so that maximum water consumption is 105 litres per person per day. This is consistent with London Plan Policy 5.15 and draft New London Plan Policy SI5 Water Infrastructure (excluding an allowance of 5 litres or less per head per day for external water consumption). This should be secured by way of condition.

Overheating

- 6.10.9 The London Plan, both in its current form and draft seeks to ensure to minimise impacts on the urban heat island through design, layout, orientation, materials and incorporation of green infrastructure. Major developments through their energy strategy should demonstrate how the development will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy set out under policy 5.9 and draft policy S1 4.
- 6.10.10 A separate overheating study was undertaken to assess and minimise overheating. Within this, a TM59 assessment undertaken using the IES Virtual Environment software, which is a CIBSE AM11 compliant thermal modelling software. The DSY1, DSY2 and DSY3, London Heathrow, high emission, 50% percentile weather files were used to assess current overheating potential. The results show that all but one of the assessed units within the development pass the overheating assessment for the current DSY1 scenario, which is the weather file recommended to be used in TM59. The development also had high pass rates when assessed using DSY2. However, in more extreme heat, such as DSY3 scenarios, the building struggles to meet the requirements of Criteria 2. Although DSY2 and DSY3 scenarios are rare weather events, guidance has been provided within the report to prevent overheating. A condition to ensure this is followed should these be deemed necessary is therefore recommended.

Wind Microclimate

- 6.10.11 In view of the taller buildings proposed on this site, a Wind Microclimate assessment has been undertaken. To predict the local wind environment associated with the completed development, and the resulting pedestrian comfort within and immediately surrounding the site, wind tunnel testing of the proposed development has been undertaken. This is the best method of quantifying and classifying in accordance with the widely accepted Lawson Comfort Criteria. A 1:300 scale model of the existing site and the surrounding area within a 360m radius of the entire site was constructed. a scale model of the building comprising the proposed development has also been constructed.
- 6.10.12 A Wind Microclimate study has been submitted alongside this application by Urban Microclimate. The report states that the site is partially sheltered from approaching winds by the surrounding buildings. The proposed development is of modest height, with the massing gradually increasing from southwest to northeast,

encouraging prevailing south-westerly winds to pass up and over the development. The report states that the potential for any downdraughts and subsequent channelling of pedestrian level winds, for prevailing south-westerly wind, is therefore limited. The report concludes that the proposed development is not expected to have any significant impact on conditions within the surrounding area, which are expected to generally remain suitable for existing activities, including recreational activities in surrounding private gardens.

Potential Cumulative effects of proposed development and Grange Farm Estate

- 6.10.13 The Urban Microclimate study suggests that the Grange Farm redevelopment would result in the proposed development being more sheltered from north-easterly winds although this is not expected to materially affect the suitability of conditions within the site as discussed above. On this basis, potential adverse cumulative effects are expected to be limited to channelling of westerly winds between the western blocks and into the combined phase of the linear garden, between the developments. However, the associated soft landscaping in this area is expected to largely mitigate this potential effect, such that conditions are expected to be suitable for recreational activities including at least short periods of standing or sitting, such as for picnics, may benefit from localised shelter from hedging or tall shrub planting (where not already proposed) to create more amenable conditions during summer. However, similar conditions would also be expected in the absence of the proposed development (due to the increased exposure to prevailing south-westerly winds). On this basis, it is not considered that the potential cumulative effects would be significant.
- 6.10.14 In conclusion, with the implementation of the landscaping and mitigation measures set out in the landscaping strategy, there would be no significant effects from the proposed development either on its own or cumulatively. On this basis, the proposal is acceptable with regard to the relevant policies set out under paragraph 6.12.1 of this appraisal.

Urban Greening

- 6.10.15 Policy 5.10 of the London Plan sets out that development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include tree planting, green roofs and walls, and soft landscaping. A target of 0.4 for residential development should be achieved in line with policy G5 of the draft London Plan.
- 6.10.16 The applicant has calculated the Urban Greening Factor (UGF) of the proposed development as 0.4, which meets the target set by Policy G5 of The Publication London Plan (2020). The Mayor's (GLA) Stage 1 response required the applicant to clarify and submit detailed drawings showing the location and design of the green roofs. The updated design and access statement show the location of the green roofs proposed on all the blocks, tree planting, permeable paving, sealed surfaces, rain gardens and other sustainable drainage elements to name a few. Compared against the existing situation which has a UGF of 0.14 means that substantial improvements are made to the urban greening across the site is

considered to weigh in favour of the proposed development. As such, Officers consider the proposals to be acceptable in this regard.

6.11 Land Contamination and Remediation

6.11.1 The relevant policies are:

- National Planning Policy Framework (2019)
- London Plan: 5.21
- Harrow Core Strategy: CS1
- Harrow Development Management Local Policies: DM15

6.11.2 A Geo-Environmental & Geotechnical Assessment (Ground Investigation) Report was produced by Jomas Engineering Environmental has been submitted with the application. A desk-based study was undertaken, and it was identified that due to the limitations with desk-based appraisals, further investigations are carried out. In relation to foundations the report suggests that all foundations should be deepened beneath deposits and founded within underlying strata. In terms of the traditional shallow foundations, the report recommends that formations are inspected by a geotechnical engineer prior to the pouring of concrete to confirm the bearing capacity. It is also concluded that the use of piling foundation solution will require the emplacement of an engineered granular piling mat to support the piling of and prevent overturning and designed in accordance with BRE 470. Recommendations in relation to the ground floor slabs, concrete in the ground, groundwater control and excavations have been provided.

6.11.3 The Council's Environmental Health Officer has not reviewed the report however as per the suggestions within the report it is recommended further site investigations, a written method statement providing details of the remediation scheme and a watching brief strategy during groundworks for unexpected contamination are provided and which can be secured by condition. Subject to this and a condition requiring the recommendations outlined in the desk-based report are carried out, the proposal would be acceptable in this regard.

6.12 Air Quality

6.12.1 The relevant policies are:

- National Planning Policy Framework (2019)
- London Plan: 7.14
- Harrow Development Management Local Policies: DM1
- Draft London Plan: SI 1

6.12.2 The applicant has submitted an Air Quality Assessment (AQA) prepared by Ardent which assess the impact of the development during construction phase and completion stage on air quality on the surrounding area and within the development itself and future residents of the site.

6.12.3 Harrow is within an 'Air Quality Management Area (AQMA) due to the exceedance of the annual and hourly mean Nitrogen Dioxide and the 24 hours mean small airborne particles.

- 6.12.4 In terms of potential effects during construction, the main emissions are likely to be dust and particulate matters (PM₁₀) generated during earth movement or from construction materials. However, with appropriate mitigation by way of appropriate duct suppression methods, the impact would have a neutral impact on the surrounding areas. The AQA states that the impact of construction traffic would be below the relevant criteria and will not be significant. Furthermore, in terms of future residents, the report concludes that air quality would be good and would not require mitigation.
- 6.12.5 The desktop assessment identifies that any additional traffic movements are likely to be the most significant local source of pollutants from the proposed development and its surroundings. The effects of this was modelled as part of the AQA and the conclusions drawn from this assessment conclude that the mean Nitrogen Dioxide emission and Particulate Matter (PM₁₀), concentrations at surrounding existing receptors from the effects of increased traffic and traffic flows associated with the proposed development is predicted to be above the benchmark requirements of the Sustainable Design and Construction SPG (Greater London Authority, 2014) and therefore the development cannot be considered to be air quality neutral in terms of transport. An assessment of operational road traffic impacts has been provided within the AQA and the report concludes that the development is not considered to be air quality neutral in terms of transport emissions, despite resulting in a significant net reduction in transport emissions and therefore additional mitigation or damage cost is considered necessary.
- 6.12.6 The GLA have commented within their Stage 1 response that the proposed development is not air quality neutral and would exceed the transport emissions benchmark (TEB), and therefore does not comply with London Plan Policy 7.14 (part B(c)) and the Mayor's The Publication London Plan Policy SI 1 (part B) 2a). The GLA have therefore requested that the applicant provide a scheme of mitigation, appropriate in scale, to address the exceedance of the TEB, or address the exceedance of the TEB in scheme design (i.e. reduce vehicle trips associated with the development) by way of condition. Compliance with the Non-Road Mobile Machinery (NRMM) Low Emission Zone for London during the construction phase would also be secured within the Construction Environmental Management Plan, to ensure compliance with Policy 7.14 (part Bb) and The Publication London Plan policy SI 1 (part D). Measures to control emissions during construction and demolition would also be secured and implemented during the construction phase, as per paragraph 6.2 of the air quality assessment, to ensure compliance with Policy 7.14 (part Bb) and The Publication London Plan Policy SI 1 (part D).
- 6.12.7 Whilst the Council's Environmental Health Team has not commented in respect of this matter, it is considered that the mitigations suggested in the AQA in respect of the construction phase would be adequately captured with the Construction Logistics condition. Subject to the imposition of the recommended condition, the proposed development would give rise to no conflict with the above stated policies.
- 6.12.8 Overall it is considered that the proposed development will not generate any likely significant effects, either during the construction or operational phases with the implementation of the mitigation measures identified above. As such, there are no

air quality constraints arising from the proposed development and there would be no conflict with the policies listed under paragraph 6.14.1 of this appraisal.

6.13 Aviation

6.13.1 The relevant policies are:

- National Planning Policy Framework (2019)
- London Plan: 6.6
- Harrow Development Management Local Policies: DM1
- Draft London Plan: T8

6.13.2 An Aviation Risk Assessment was prepared by PagerPower. The position and mass of the proposed development have been informed by advice and recommendations provided. The site is located 4.25km to the north of Safeguarding Area for RAF Northolt and occupies aerodrome height, technical and birdstrike statutory safeguarding zones.

6.13.3 The Ministry of Defence (MOD) was consulted on the proposed development. The MOD completed their own Obstacle Limited Surfaces (OLS) assessments at the early development stages of the application, alongside the applicants both of which informed the current layout and building altitudes. It was concluded that the all assessed building would not infringe the RAF Northolt OLS. The MOD provided comments based on the most up to date iterations of the development and state that in respect of the aerodrome height and technical safeguarding zones no concerns are raised. Furthermore, Within the birdstrike safeguarding zone, the principal concern of the MOD is with the creation of new habitats which may attract and support populations of large and, or, flocking birds hazardous to air traffic. The flat roofs with photovoltaic arrays within this proposal have the potential to attract and support breeding gulls and feral pigeons. To prevent gulls and feral pigeons from successfully breeding on the roof, full access to the roofs should be included in the design and a Bird Hazard Management Plan (BHMP) is required. The BHMP should include provision to prevent successful breeding by large gulls and feral pigeons on the roof spaces. This requirement should be applied as a condition of any planning permission granted.

6.13.4 The MOD concluded that provided the maximum build height does not exceed 82.725m AODL and a condition is applied to any consent granted for the submission of a BHMP and a Construction Management Strategy then the MOD does not object to this proposal. Furthermore, the consultant report confirms that the development would lie beneath the Obstacle Limitation Surfaces for RAF Northolt and would therefore not impinge upon: (1) Take-off and Climb Surface (TOCS); (2) Approach path (APPS); and Conical Surface. Subject to the aforementioned conditions, it is considered that the proposal would accord with the policies above.

6.14 Secure by Design

6.14.1 The Metropolitan Police Secure by Design Officer was consulted during the application and raised concerns with the stepped connections between the site and Grange Farm Development as well as some detailed aspects of the

development that are proposed, which could attract crime and anti-social behaviour if the development is appropriately secured. During the course of the application, the applicant has confirmed that there would be appropriate external lighting and CCTV as added security measures which can be conditioned. Other detailed aspects, including the choice of doorways and boundary treatments will be conditioned and a pre-occupation condition is also attached to ensure the proposal achieved Secure by Design Accreditation.

6.15 Statement of Community Engagement

- 6.15.1 The NPPF, Localism Act and the Council's Statement of Community Involvement encourage developers, in the case of major applications such as this, to undertake public consultation exercise prior to submission of a formal application.
- 6.15.2 Prior to the submission of this application, the applicant held a one day consultation event on 27th February 2020. The applicant had sent out leaflets (1,767 households) of invitation to local residents that residing close to the site. Invitation letters were also sent to local stakeholders, ward councillors, Harrow Hill Trust, Harrow Hill Planning Committee, Harrow Federation of tenants and residents association. The exhibition was held at the Royal British Legion, 76 Northolt Road and 79 residents attended. The proposals were also presented at the Council's Major Development Panel in February 2020. The applicant has submitted a comprehensive Statement of Community Involvement which sets out the outcome and feedback from these public events.
- 6.15.3 The Council also sent out letters of consultation to local residents in the surrounding area inviting them to make representations on the proposed development.
- 6.15.4 The applicant has sought to encourage public consultation in respect the proposal in line with the guidance set out in the NPPF and the Localism Act.

6.16 S.106 Obligations and Infrastructure

- 6.16.1 The heads of terms of the section 106 agreement have been set out above. These are considered necessary to make the application acceptable, in accordance with policies 3.11, 3.13, 5.2, 6.3, 7.4, 7.5 and 7.6 of The London Plan (2016), Core Strategy (2012) policy CS1 and policies DM1, DM2 DM42, DM43 and DM50 of the Harrow Development Management Polices Local Plan and the Supplementary Planning Document: Planning Obligations (2013).

7.0 CONCLUSION AND REASONS FOR APPROVAL

- 7.1 The statutory position is that planning applications have to be determined in accordance with the development plan unless material considerations indicate otherwise. The relevant policies have been set out within the report above.
- 7.2 The redevelopment of the site would enhance the urban environment in terms of material presence, attractive streetscape, and good routes, access and makes a positive contribution to the local area, in terms of quality and character and delivering new public spaces to support the wider masterplan and community. The massing and scale proposed would appropriately relate to the wider masterplan site and would permit full optimisation of this previously developed land to bring forward much needed housing which would positively add to the Council's housing delivery targets. The proposal would secure the provision of affordable housing at a level that meets the minimum affordable housing target set out in the development plan.
- 7.3 Subject to appropriate conditions and planning obligations, the proposal would enhance biodiversity, provide landscaping and public realm improvements, appropriately address surface water flood risk, improve drainage measures, and contribute towards sustainable patterns of travel and healthy streets. These are all given weight. Reasonable weight is afforded to economic benefits that would arise from the provision of employment opportunities during the construction phase and the spending power from 191 new households within the local area. Taken a whole, these benefits range from moderate to significant in magnitude and can all be regarded as public benefits of the proposal.
- 7.4 For all these reasons, the material considerations and benefits in favour of the proposal would outweigh the harm. In accordance with the NPPF, including its presumption in favour of sustainable development, officers recommend that the planning application should be approved, and planning permission granted, subject to the section 106 Planning Obligations and schedule of conditions.

APPENDIX 1: Conditions and Informatives

Conditions

1. Timing

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

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

2. Approved Plans and Documents

Save where varied by other planning conditions comprising this planning permission or unless otherwise agreed in writing by the local planning authority, the development hereby permitted shall be carried out in accordance with the following approved plans to show the redevelopment of the site to include the erection of three buildings ranging between 4-6 storeys and up to 191 residential units, associated landscaping; Access; Parking; Refuse stores and cycle parking; associated work:

Plan Numbers:

NRP-HBA-SW-ZZ-DR-A-08-0500 Rev 1, NRP-HBA-SW-ZZ-DR-A-08-0600 Rev 1, NRP-HBA-SW-ZZ-DR-A-08-0700 Rev 1, NRP-HBA-P01-XX-DR-A-20-0201 Rev P2, NRP-HBA-P01-XX-DR-A-20-0202 Rev P2, NRP-HBA-P01-XX-DR-A-20-400 Rev P2, NRP-HBA-P01-XX-DR-A-20-0401 Rev P2, NRP-HBA-P01-05-DR-A-20-0110 Rev P2, NRP-HBA-P01-01-DR-A-20-1202 Rev P2, NRP-HBA-P01-04-DR-A-20-0108 Rev P2, NRP-HBA-P01-00-DR-A-20-0100 Rev P2, NRP-HBA-P01-06-DR-A-20-0112 Rev P2, NRP-HBA-P01-02-DR-A-20-0104 Rev P2, NRP-HBA-P01-05-DR-A-20-0111 Rev P2, NRP-HBA-P01-03-DR-A-20-0106 Rev P2, NRP-HBA-P01-1-DR-A-20-02103 Rev P2, NRP-HBA-P01-04-DR-A-20-0109 Rev P2, NRP-HBA-P01-00-DR-A-20-0101 Rev P2, NRP-HBA-P01-06-DR-A-20-0113 Rev P2, NRP-HBA-P01-02-DR-A-20-0105 Rev P2, NRP-HBA-P01-03-DR-A-20-0107 Rev P2, NRP-HBA-P02-XX-DR-A-20-0203 Rev P2, NRP-HBA-P02-05-DR-A-20-0119 Rev P2, NRP-HBA-P02-01-DR-A-20-0115 Rev P2, NRP-HBA-P02-04-DR-A-20-0118 Rev P2, NRP-HBA-P02-00-DR-A-20-0114 Rev P2, NRP-HBA-P02-06-DR-A-20-0120 Rev P2, NRP-HBA-P02-02-DR-A-20-0116 Rev P2, NRP-HBA-P02-03-DR-A-20-0117 Rev P2, NRP-HBA-P02-XX-DR-A-20-0402 Rev P2, NRP-HBA-P03-XX-DR-A-20-0205 Rev P2, NRP-HBA-P03-XX-DR-A-20-0204 Rev P2, NRP-HBA-P03-05-DR-A-20-0126 Rev P2, NRP-HBA-P03-XX-DR-A-20-0122 Rev P2, NRP-HBA-P03-04-DR-A-20-0125 Rev P2, NRP-HBA-P03-00-DR-A-20-0121 Rev P2, NRP-HBA-P03-06-DR-A-20-0127 Rev P2, NRP-HBA-P03-02-DR-A-20-0123 Rev P2, NRP-HBA-P03-03-DR-A-20-0124 Rev P2, NRP-HBA-P03-XX-DR-A-20-0403 Rev P2, NRP-HBA-SW-XX-DR-A-20-0020 Rev P2, NRP-HBA-SW-05-DR-A-20-0015 Rev P2, NRP-HBA-SW-01-DR-A-20-0011 Rev P3, NRP-HBA-SW-04-DR-A-20-0014 Rev P3, NRP-HBA-SW-00-DR-A-20-0010 Rev P4, NRP-HBA-SW-06-DR-A-20-0016 Rev P3, NRP-HBA-SW-02-DR-A-20-0012 Rev P3, NRP-HBA-SW-03-DR-A-20-0013 Rev P3, NRP-HBA-SW-ZZ-DR-A-20-0030 Rev P2, NRP-HBA-SW-ZZ-DR-A-20-0031 Rev P2, NRP-HBA-SW-XX-DR-A-08-0000 Rev P2, NRP-HBA-SW-00-DR-A-20-0018 Rev P2, NRP-HBA-P03-SW-DR-SK-0008

Supporting Documents:

Planning Statement (Prepared by DP9, June 2020), Aborigicultural Impact Assessment (Prepared by PJC Consultancy, 9th June 2020), Air Quality Assessment (Prepared by Ardent Consulting Engineers, ref: 193000-09, dated June 2020), Design and Access Statement (Prepared by Hawkins Brown, dated 15 June 2020), Archaeological Desk-based assessment (Prepared by RPS, dated June 2020), Delivery and Servicing Management Plan (Prepared by Ardent Consulting Engineers, ref: 193000-07, dated June 2020), Daylight and Sunlight Report (Prepared by Point, dated June 2020), Covering Letter (Prepared by Point, dated 12 June 2020), Preliminary Ecological Appraisal (Prepared by The Ecology Partnership), Flood Risk Assessment and Drainage Strategy (Ref: 193000-05, dated June 2020), Framework Travel Plan (Prepared by Ardent Consulting Engineers, dated June 2020), Geo-Environmental & Geotechnical Assessment (Ground) Investigation Report (Prepared by JOMAS Engineering Environmental), Healthy Streets Transport Assessment (Prepared by Ardent Consulting Engineers, Dated June 2020), Noise Assessment (Prepared by Ardent Consulting Engineers, dated June 2020), Statement of Community Involvement (SCI) (Prepared by Your Shout, dated May 2020), Utilities and Services Statement (Prepared by Ardent Consulting Engineers, dated June 2020), Viability Study (Prepared by Turner Morum LLP, dated June 2020), Aviation Risk Assessment (Prepared by Pagerpower, dated 17 June 2020), Car Park Management Plan (Prepared by Ardent Consulting Engineers, dated June 2020), Circular Economy Statement (Prepared by JAW, dated 12 June 2020), Life Cycle Carbon Assessment (Prepared by JAW, dated 15 June 2020), Outline Construction Logistics Plan (Prepared by Ardent, dated June 2020), Overheating Assessment (Prepared by JAW, dated 15 June 2020), Design and Access (5.0 Landscape Design only), Affordable Housing Document (Prepared by Hawkins Brown, dated 16 November 2020), Technical Report (Prepared by Ardent Consulting Engineers (dated 17 November 2020), Energy Strategy (Prepared by JAW, dated 6 October 2020), Fire Engineering Concept Fire Strategy Report (Prepared by Clarke Banks, dated 3.6.2020), Covering Letter prepared by DP9 (dated 16 November 2020), Wind Microclimate Study (Prepared by Urban Microclimate, dated July 2020), Heat Network Connection Initial Report (Prepared by TPS, dated October 2020), Area Schedule (dated November 2020), Urban Greening Factor – Summary (Prepared by Hawkins Brown, dated 21/12/2020), Email dated 22 May 2020 re. Energy Centre.

3. Construction Logistics Plan

No development shall take place, including demolition, until a construction logistics plan has first been submitted to the Local Planning Authority in writing to be agreed. The plan shall detail the arrangements for:

- a) the parking of vehicles of site operatives and visitors;
- b) loading and unloading of plant and materials;
- c) storage of plant and materials used in construction the development;
- d) the erection and maintenance of security hoardings including decorative displays and facilities for public viewing;
- e) wheel washing facilities; and

- f) a scheme for recycling/disposing of waste resulting from demolition and construction works.
 - g) measures for the control and reduction of dust
 - h) measures for the control and reduction of noise and vibration.
- The construction of the development shall be carried out in accordance with the plan so agreed.

REASON: To ensure that measures are put in place to manage and reduce noise and vibration impacts during demolition and construction and to safeguard the amenity of neighbouring occupiers.

4. Phasing Strategy

Notwithstanding the approved plans, the development hereby approved shall not commence until a Phasing Strategy has been first submitted to, and approved in writing by the local planning authority, setting out how each plot and the buildings within those plots including affordable housing units which will be secured within the first phase of the proposed development, along with associated streets and landscape works would be delivered. The details shall include appropriate safeguards, if necessary, to be provided for buildings that are ready for occupation whilst construction works continue on other phases of the site and any temporary works that may be required to facilitate access to any buildings/part of the site. The Phasing Strategy shall, unless otherwise agreed in writing, be implemented as approved.

REASON: Due to the quantum of development and the number of plots associated with this development, a Phasing Strategy is required to ensure the development is delivered on an appropriate phased basis and appropriate safeguards are in place during these phased work to protect the amenities of future residents of this site. Details are required PRIOR TO COMMENCEMENT OF DEVELOPMENT to ensure a satisfactory method of construction is agreed prior to any works on site commencing.

5. Construction Environmental Management Plan

No site works or development shall take place until a Construction Environmental Management Plan (CEMP) is submitted to and approved in writing by the local planning authority. This should include:

- 1a) how potential impacts on biodiversity, including protected and priority species will be avoided or, where this is not entirely possible, minimized
- b) the steps to be taken to ensure such measures will be fully implemented.
- 2) A Mitigation and Enhancement Management Plan detailing the measures to be undertaken to provide appropriate mitigation and gain for biodiversity, in respect of the impacts of the scheme's construction and operation, within and around the site, to include the provision of:
 - a) Trees, shrubs and other vegetation, including green walls, and any necessary protection for retained trees;
 - b) Full specification of a mix of blue-green and brown roof provision, including blue-green bio-solar areas, with full details of build-up, substrate, water retention, plant species mixes, watering, roof-top invertebrate shelters

and target condition across each roof area. These measures would need also to take account of RAF Northolt views.

- c) Full details of the type, numbers and locations for bat, bird and other wildlife shelters, with a requirement to include provision for swift, house sparrow and a selection of other birds and a mix of bat species including breeding shelters. All bat and bird boxes should be incorporated within the fabric of the new buildings and be of 'woodcrete' or similarly durable material Overall provision should be one wildlife shelter per every three dwellings with an approximate 45:40:15 mix for birds: bats and invertebrates.
- 3) A detailed lighting strategy that will minimize potential disturbance to the behaviour of nocturnal species including bats and permanently prevent direct illumination of the provided bat shelters.
- 4) A detailed plan for:
- a) the timing of the above works in relation to the construction schedules and the establishment phase for the soft landscaping;
 - b) the maintenance and management of the provided wildlife features for a period of at least 5 years following on from the establishment of the soft landscaping.

The works shall be completed in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.

REASON: For the purposes of proper planning and in support of local, regional and national policy requirements for the enhancement of biodiversity and access to nature.

6. Construction Management Strategy – Air Traffic

Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority covering the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the details of cranes and other tall construction equipment (including the details of obstacle lighting).

The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

Reason: To ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems.

REASON: To ensure the safe operation of air traffic.

7. Levels

No site works or development shall commence until details of the levels of the building(s), road(s) and footpath(s) in relation to the adjoining land and highway(s), and any other changes proposed in the level of the site, has first been submitted to and agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with the details so agreed.

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

8. Surface and Foul Water Disposal

No development shall take place, until works for the disposal of surface and foul water have been submitted to, and approved in writing by, the local planning authority. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter. The applicant should contact the Harrow Infrastructure Team at the earliest opportunity.

REASON: To ensure that the development achieves an appropriate greenfield run-off rate in this critical drainage area and to ensure that sustainable urban drainage measures are exploited

9. Surface Water Attenuation

No development shall take place, until surface water attenuation and storage works have been submitted to, and approved in writing by, the local planning authority. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter. The applicant should contact the Harrow Infrastructure Team at the earliest opportunity.

REASON: To ensure that the development achieves an appropriate greenfield run-off rate in this critical drainage area and to ensure that sustainable urban drainage measures are exploited

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

10. Permeable Paving and Drainage Strategy

Notwithstanding the approved details and prior to the commencement of development, full details of the permeable paving and details relating to the long-term maintenance and management of the on-site drainage shall be submitted to and approved in writing by the Local Planning Authority. Details thereby approved shall be retained thereafter.

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

11. Emergency Planning

The development of any building hereby permitted shall not be commenced above damp-proof course level until Emergency Planning Information (reference should be made to EA flood warning procedures for occupants and users. Details

of safe access/egress arrangements and a plan indicating a safe route for the occupants and users away from the source of flooding should be submitted).

has been submitted to and approved in writing by the Local Planning Authority.

Reason: To build in resistance and resilience in managing, reducing and mitigating the effects of flood risk and to ensure evacuation arrangements are adequate and safe access/egress from the site during a flood event is provided.

12. Pipe Protection

The development hereby permitted shall not commence until a scheme for the protection of the piped watercourse has been submitted to, and approved in writing by, the Local Planning Authority. The scheme shall include a structural survey by CCTV and trial holes to assess the construction, position, condition and expected life of the culvert; proposal of an agreed method of repair or replacement if required; full details demonstrating that the new structure does not impart any load on the culvert or destabilise it in any way; details of any necessary build over or adjacent to the culvert; details of access for future repairs, blockage clearance, maintenance and future condition surveys, connection point and discharge level.

The applicant can contact the Harrow Infrastructure Team for further information regarding this matter.

Reason: To protect the integrity of the piped watercourse structure, reduce and mitigate the effects of flood risk.

13. Materials

Notwithstanding the details shown on the approved drawings, the development relating to each building, plot or phase (whichever is relevant), hereby approved shall not progress beyond damp proof course level until samples of the materials (or appropriate specification) to be used in the construction of the external surfaces noted below have been submitted to, and agreed in writing by, the local planning authority:

- a) facing materials for the building, including brickwork bond details;
- b) windows/ doors, including those to all servicing areas;
- c) balcony screens including balustrade detail, privacy screens and soffits;
- d) boundary treatment including all vehicle and pedestrian/ access gates;
- e) ground surfacing; and
- f) raised planters.

The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To safeguard the appearance of the locality and to ensure a satisfactory form of development.

14. Noise and Ventilation

The development hereby approved in relation to criterion a) and b) below concerning each building, plot or phase (whichever is relevant) shall not progress beyond damp proof course level until details noted below have been submitted to and approved in writing by the local planning authority:

a) full details (including specification) of any extraction flues, plant/ ventilation systems, rainwater disposal systems (including downpipes) and any rollershutters, gates and other means of controlling access to the car park or areas within the site including, but not limited to the Mews Street adjacent to Plot 03;

b) details to demonstrate that all plant/ ventilation systems would meet the plant noise criteria set out in the submitted Environment Statements; and

c) a follow up acoustic survey to demonstrate installed plant compliance shall be submitted within six months of the first occupation of the development.

The application shall be implemented in full accordance with such details and be maintained thereafter.

REASON: To ensure that potential adverse noise impacts to residential premises within the development are mitigated.

15. Air Source Heat Pump and Revised Energy Strategy

a) The development hereby approved shall not commence until detailed specification and design of the Air Source Heat Pump (ASHP) and an updated energy strategy which takes into account the detailed specification and design of the ASHP has first been submitted to and approved in writing by the local planning authority. This should also include details of the following:

1. Decarbonisation strategy for the DH network connection;
2. GLA's Carbon Emission Reporting Spreadsheet for use updated SAP10 emission factors alongside the SAP 2012 emission factors;
3. Confirmation of estimated energy costs.

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

b) Within 3 months (or other such period agreed in writing by the local planning authority) of the final completion of the development a post construction assessment shall be undertaken demonstrating compliance with the approved Energy Statement; which thereafter shall be submitted to the local planning authority for written approval.

REASON: To ensure the delivery of a sustainable development

16. Contamination

The development hereby approved in relation to each plot or phase (whichever is relevant) shall not be first occupied until a verification report demonstrating completion of the works set out in the approved remediation strategy 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.

A verification report is only required to be submitted and approved once per phase.

REASON: To protect groundwater and future end users of the site

17. Landscaping

Notwithstanding the details that have been submitted, the development hereby approved shall not commence until a scheme for detailed hard and soft landscaping of the development has been submitted to and approved in writing by the Local Planning Authority. To include:

- a) A scheme for detailed hard and soft landscaping of the development, to include details of the planting, hard surfacing materials, raised planters and external seating and so on. Soft landscaping works shall include: planting plans (at a scale not less than 1:100), written specification of planting and cultivation works to be undertaken and schedules of plants, noting species, plant sizes, plant container sizes (all at time of planting) and proposed numbers / densities and an implementation programme. Planting which may provide benefits in terms of improving air quality are encouraged. The hard-surfacing details shall include samples to show the texture and colour of the materials to be used and information about their sourcing/manufacturer. The hard and soft landscaping details shall demonstrate how they would contribute to privacy between the communal garden/open space areas and the adjacent co-living units.
- b) Green roofs, hard and soft landscape details and planting plans, the roofs at first, third and fourth floor and the roof area with PV panels to be incorporated into the green roof areas where feasible, including written specification of the planting and the biodiverse roof details, planting plans, and associated features (e.g. invertebrate shelters), details of the proposed irrigation or any watering system to be installed for regular watering in dry / drought conditions for the landscaped areas maintenance and proposed ongoing plant replacement, for any plant failures, during the lifetime of the built development;
- c) Full scale metric cross sections and elevations for all communal open amenity spaces (at a scale of not less than 1:100) including the proposed details for level changes.
- d) Details of all furniture, boundary treatment, specification for the proposed supports and fixings for plants, landscape structures and any pergolas and climbing plant frames, including proposed material and source / manufacturer,

irrigation for planting and detailed drawings of such; for all communal areas, raised beds and bespoke furniture;

- e) Details of the two access points on the eastern boundary of the site including step depths, access ramps and / or any relevant details associated with the safe access to and from the Grange Farm Development; and
- f) Suitable wayfinding signage and mitigation should be secured to ensure the safe function of pedestrian, play and servicing road through the middle of the site and to avoid conflicts between the different user groups.

REASON: To ensure that the development achieves a high standard of design, layout and amenity and make provision for hard and soft landscaping which contributes to the creation of a high quality, accessible, safe and attractive public realm

18. Refuse Strategy

Unless otherwise agreed in writing by the Local Planning Authority, prior to commencement of development (excluding any demolition works) pursuant to this permission, details of:

- (a) the proposed number of refuse and recycling bins per unit.

The development shall be carried out in accordance with the approved details and the details outlined within the Delivery and Servicing Management Plan (Prepared by Ardent) dated June 2020 unless otherwise agreed in writing by the Local Planning Authority.

REASON: To ensure that adequate refuse storage and disposal facilities are provided, in the interests of local character and amenity.

19. Water Efficiency

The development hereby approved in relation to each building, plot or phase (whichever is relevant) shall not progress beyond damp proof course level until a strategy for the efficient use of mains water within the residential parts of the development, pursuant to a water consumption limit of 105 litres per person per day, has been submitted to, and agreed in writing by, the local planning authority. The development shall be carried out in accordance with the strategy so agreed and shall be retained as such thereafter.

REASON: To ensure that the development makes efficient use of mains water.

20. Play Space

The development hereby approved shall not commence above damp proof course level until a detailed play strategy for the site has first been submitted to and agreed by the Local Planning Authority. Such details shall comprise: a specification of all play equipment to be installed (including provision for children with disabilities and special sensory needs where possible); a specification of the surface treatment within the play areas; and a detailed assessment on the quantum of play space proposed. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development makes appropriate provision for play and informal recreation

21. Photovoltaic

The development hereby approved in relation to each building, plot or phase (whichever is relevant) shall not progress above damp proof course level until a detailed roof layout has been submitted to, and approved by the local planning authority indicating the proposed location of the photovoltaic panels (PV). This should include details of over shading impacts on roof plant uses and details ensuring these would not exceed RAF Northolt height restrictions.

REASON: To ensure the delivery of a sustainable development

22. Window and Door Reveals

Notwithstanding the details shown on the approved drawings, the construction of the buildings hereby approved shall not progress above damp proof course level until there has been submitted to and approved in writing by the Local Planning Authority detailed sections at metric scale 1:20 through all external reveals of the windows and doors on each of the elevations. In the event that the depth of the reveals is not shown to be sufficient, a modification showing deeper reveals shall be submitted for approval in writing. The development shall be completed in accordance with the approved details and shall thereafter be retained.

REASON: To ensure a high-quality finish to the external elevations of the building

23. Communal Facilities

Prior to the first occupation of the development, details of a strategy for the provision of communal facilities for television reception (e.g. aerials, dishes and other such equipment) shall be submitted to the Local Planning Authority in writing to be agreed. Such details shall include the specific size and location of all equipment. The approved details shall be implemented prior to the first occupation of the relevant phase and shall be retained thereafter. No other television reception equipment shall be introduced onto the walls or the roof of the building without the prior written approval of the Local Planning Authority

REASON: To ensure that any telecommunications apparatus and other plant or equipment that is required on the exterior of the buildings preserves the high-quality design of the buildings and spaces

24. Landscape Management and Maintenance

The development relating to the Detailed Application hereby approved shall not be first occupied until a scheme for the on-going management, management programme of works and maintenance of all the hard and soft landscaping within the development, to include a Landscape Management Plan, including long term design objectives, management responsibilities and set out, graphically and / or in writing, the overall functional and aesthetic objectives of the landscape scheme and the steps (e.g. legal arrangements including ownership and management responsibilities, planned maintenance tasks, any phased works, management programme of works, monitoring procedures etc.) that will be taken after implementation to ensure that the scheme becomes successfully established and reaches maturity.

The maintenance schedules should include details of the arrangement for the implementation for all landscape areas including communal residential areas green roof, blue infrastructure, other than small, privately owned, domestic gardens and who is responsible for the maintenance. The aforementioned details shall be submitted to, and approved in writing by, the local planning authority. Details shall also include schedule of landscape maintenance for year 1, years 2-5 and on-going maintenance from year 6 onwards.

The Landscape Management Plan and Landscape Maintenance Plan shall be carried out in a timely manner as approved and shall be retained as such thereafter.

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes (i) to the creation of a high quality, accessible, safe and attractive public realm and (ii) to the enhancement, creation and management of biodiversity

25. Secure by Design

Prior to the first occupation of the development, evidence of Secured by Design Certification shall be submitted to the Local Planning Authority to be agreed in writing, or justification shall be submitted where the accreditation requirements cannot be met. Secure by design measures shall be implemented and the development shall be retained in accordance with the approved details.

REASON: In the interests of creating safer and more sustainable communities and to safeguard amenity by reducing the risk of crime and the fear of crime

26. Delivery and Servicing Plan

Notwithstanding the details hereby approved, the development hereby approved shall not be first occupied until a Delivery and Servicing Plan has first been submitted to and agreed in writing by the Local Planning Authority. The revised Delivery and Servicing Plan shall include full details of the onsite Refuse

Management Strategy. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter. All deliveries and servicing associated with the development shall be carried out only in accordance with the approved details.

REASON: To ensure that the transport network impact of deliveries associated with the development are managed

27. Car Park Design and Management Plan

The development hereby permitted shall not be occupied until a detailed parking management plan has been submitted to and agreed in writing by the local planning authority. The plan shall make provision for:

- a) details of how the parking spaces would be managed;
- b) identify the electric vehicle charging point spaces that are to be provided as 'active' spaces and those as 'passive' spaces;
- c) detail the relevant blue-badge parking spaces within the car park;
- d) detail the provision of cycle parking for residential and non-residential users, including visitors to the development, which shall include the type of cycle stands proposed (including specification);
- e) Identify number and location of disabled bay(s) for London Affordable Rent Housing.
- f) details of the siting, size and manoeuvrability of motorcycle spaces.

REASON: To ensure that the development provides sufficient blue badge parking, cycle, motorcycle and electric vehicle charging points.

28. Landscape Implementation

All hard landscaping shall be carried out prior to the occupation of any part of the development or in accordance with a programme that has been submitted to the Local Planning Authority in writing to be agreed. All soft landscaping works including planting, seeding or turfing comprised in the approved scheme of landscaping shall be carried out no later than the first planting and seeding season following the final occupation of the residential parts of the buildings, or the completion of the development, whichever is the sooner. Any existing or new trees or shrubs which, within a period of 5 years from the completion of the development, die, are removed, or become seriously damaged, diseased or defective, shall be replaced in the next planting season, with others of a similar size and species, unless the local authority agrees any variation in writing.

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes (i) to the creation of a high quality, accessible, safe and attractive public realm and (ii) to the enhancement, creation and management of biodiversity

29. Aboricultural Site Supervision

Prior to commencement of work at the site, the LPA will be provided with clear and obvious proof that the details of the Aboricultural Impact Assessment (Prepared by PJC, dated 9 June 2020) have been adhered to, either through separate reports or single larger report, summarising details of each clerk of works visit and including (where relevant) photographic evidence of adherence to the aforementioned report and Tree Protection Plan. This condition may only be discharged on completion of the development, subject to satisfactory evidence of compliance through contemporaneous monitoring of tree protection throughout construction, by the appointed specialist

REASON: to safeguard the protected trees adjacent to the application site during construction

30. Refuse Storage

The refuse bins shall be stored at all times, other than on collection days, in the designated refuse storage area, as shown on the approved drawing plans.

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

31. Accessible and Wheelchair Dwellings

A minimum of 10% of the units shall be built in accordance with Building Regulation standard M4 (3) 'Wheelchair User Dwellings'. All other residential units in this development, as detailed in the submitted and approved drawings, shall be built to Building Regulation Standard M4(2) 'Accessible and adaptable dwellings'. The development shall be thereafter retained to those standards.

REASON: To ensure provision of 'Wheelchair and Accessible and adaptable' housing

32. Communications

Notwithstanding the provisions of Part 16 (Communications) to Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015, or any order revoking and replacing that Order with or without modification, no development that would otherwise be permitted by that part of the Order (or the equivalent provisions of any replacement Order) shall be carried out without planning permission having first been obtained by the local planning authority.

REASON: To ensure that the development preserves the highest standards of architecture and materials

33. Appearance of buildings
Other than those shown on the approved drawings, no soil stacks, soil vent pipes, flues, ductwork or any other pipework shall be fixed to the elevations of the building hereby approved.

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

34. Contamination 2

If, during development, contamination not previously identified is found to be present at the site then no further construction of that phase of the development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unanticipated contamination is to be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

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

35. Mailboxes

The mailboxes as shown on the approved plans shall be installed to ensure that they are secure and meet all safety standards and shall be made available prior to the first occupation of each relevant building and maintained thereafter.

REASON: To ensure that the development contributes to the achievement of a lifetime neighbourhood and a high standard of design and layout.

36. Piling

Piling or 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.

37. Storage

The residential units hereby approved shall each be provided with storage space in accordance with standard set out under Table 3.3 (Minimum Space Standards for new dwellings) appended to policy 3.5C of the London Plan (2016) unless otherwise agreed in writing by the local planning authority.

REASON: To ensure that the development achieves a high standard of residential quality for future occupiers of the development

38. Connection to District Heat Network (DHN)

Should a connection to the Grange Farm district heating networking not be achieved within 5 years of occupation of the development, the applicant must provide confirmation and evidence to the local planning authority that retrofitting of the temporary gas boiler energy centre hereby approved, with LZC heating technology that will meet the 35% on-site carbon reduction target of the development has been provided, unless otherwise agreed.

REASON: To ensure the delivery of a sustainable development

Informatives

1. Planning Policie

The following policies are relevant to this decision:

The London Plan (2016): 2.8, 3.3, 3.5 3.4, 3.5, 3.6, 3.8, 3.10, 3.11, 3.13, 5.1, 5.2, 5.3, 5.4, 5.5, 5.6, 5.7, 5.11, 5.12, 5.13, 5.15, 5.18, 5.21, 6.1, 6.3, 6.9, 6.10, 6.11, 6.13 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.8, 7.14, 7.15, 7.19, 7.21, 8.2

Publication London Plan (2020): GG2, GG4, GG6, D1, D2, D3, D4, D5, D6, D7, D8, D14, H1, H4, H5, H6, H10, HC1, G6, G7, G8, S11, S12, S13, S14, S15, S12, S13, T1, T2, T3, T4, T5, T6, T6.1, T7, DF11

Harrow Core Strategy (2012): CS1A, CS1B, CS1D, CS1E, CS1H, CS1I, CS1J, CS1K, CS1R, CS1U, CS1W, CS1X, CS1Z, CS8I

Development Management Policies DPD (2013): DM1, DM2, DM7, DM9, DM10, DM12, DM13, DM14, DM15, DM20, DM21, DM22, DM24, DM27, DM28, DM42, DM43, DM44, DM45, DM50

Supplementary Planning Document: Residential Design Guide (2010)

Site Allocations Development Plan Document (2013)

Planning Obligations and Affordable Housing Supplementary Planning Document (2013)

Mayor of London's Housing Supplementary Planning Guidance (2016)

Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance (2017)

2. Considerate Contractor Code of Practice

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

3. The Party Wall etc. Act 1996

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

1. work on an existing wall shared with another property;
2. building on the boundary with a neighbouring property;
3. excavating near a neighbouring building,

and that work falls within the scope of the Act. Procedures under this Act are quite separate from the need for planning permission or building regulations approval.

"The Party Wall etc. Act 1996: Explanatory booklet" is available free of charge from: Communities and Local Government Publications, PO Box 236 Wetherby, LS23 7NB. Please quote Product code: 02 BR 00862 when ordering. Also available for download from the CLG website:

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/133214.pdf> Tel: 0870 1226 236, Fax: 0870 1226 237, Textphone: 0870 1207 405, E-mail:

Ucommunities@twoten.comU4T

4. Mayoral Community Infrastructure Levy (Provisional)

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

The Provisional Mayoral CIL liability for the application, based on the Mayoral CIL levy rate for Harrow of £60/sqm is £998,880 This amount includes indexation which is 323/323. The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).

You are advised to visit the planningportal website where you can download the appropriate document templates. Please complete and return the Assumption of Liability Form 1 and CIL Additional Information Form 0.

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

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

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

The above forms should be emailed to HarrowCIL@Harrow.gov.uk Please note that

the above forms must be completed and provided to the Council prior to the commencement of the development; failure to do this may result in surcharges and penalties

5. Harrow Community Infrastructure Levy (Provisional)

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

Harrow's Charges are:

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

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

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

All other uses - Nil.

The Provisional Harrow CIL liability for the application, based on the Harrow CIL levy rate for Harrow of £110/sqm is £2,730,604.94

This amount includes indexation which is 323/224. The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).

The CIL Liability is payable upon the commencement of development.

You are advised to visit the planningportal website where you can download the relevant CIL Forms.

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

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

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

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

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

The above forms should be emailed to HarrowCIL@Harrow.gov.uk

Please note that the above forms must be completed and provided to the Council prior to the commencement of the development; failure to do this may result in surcharges.

6. Pre-application Engagement

Statement under Article 35(2) of The Town and Country Planning (Development Management Procedure) (England) Order 2015. This decision has been reached in accordance with paragraphs 39-46 of The National Planning Policy Framework. Pre-application advice was sought and provided and the submitted application was in accordance with that advice

7. Sustainable Urban Drainage

The applicant is advised that surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SUDS). SUDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SUDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SUDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity. Where the intention is to use soak ways they should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365. Support for the SUDS approach to managing surface water run-off is set out in the National Planning Policy Framework (NPPF) and its accompanying technical guidance, as well as the London Plan. Specifically, the NPPF (2012) gives priority to the use of sustainable drainage systems in the management of residual flood risk and the technical guidance confirms that the use of such systems is a policy aim in all flood zones. Policy 5.13 of the London Plan (2012) requires development to utilise sustainable drainage systems unless there are practical reasons for not doing so. Sustainable drainage systems cover the whole range of sustainable approaches to surface drainage management. They are designed to control surface water run-off close to where it falls and mimic natural drainage as closely as possible. Therefore, almost any development should be able to include a sustainable drainage scheme based on these principles. The applicant can contact Harrow Drainage Section for further information

8. Compliance with conditions

Compliance with Planning Conditions Requiring Submission and Approval of Details Before Development Commences

- You will be in breach of planning permission if you start development without complying with a condition requiring you to do something before you start. For example, that a scheme or details of the development must first be approved by the Local Planning Authority.
- Carrying out works in breach of such a condition will not satisfy the requirement to commence the development within the time permitted.
- Beginning development in breach of a planning condition will invalidate your planning permission.
- If you require confirmation as to whether the works you have carried out are acceptable, then you should apply to the Local Planning Authority for a certificate of lawfulness.

9. Highways interference

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

10. Naming and Numbering

Harrow Council is responsible for the naming and numbering of new or existing streets and buildings within the borough boundaries. The council carries out these functions under the London Government Act 1963 and the London Building Acts (Amendment) Act 1939. All new developments, sub division of existing properties or changes to street names or numbers will require an application for official Street Naming and Numbering (SNN). If you do not have your development officially named/numbered, then then it will not be officially registered and new owners etc. will have difficulty registering with utility companies etc. You can apply for SNN by contacting technicalservices@harrow.gov.uk or on the following link. http://www.harrow.gov.uk/info/100011/transport_and_streets/1579/street_naming_and_numbering

Checked

<u>Interim Chief Planning Officer</u>	<u>Beverley Kuchar 07/01/2021</u>
<u>Corporate Director</u>	<u>Paul Walker 07/01/2021</u>

APPENDIX 2: SITE PHOTOS

View from Northolt Road access into the Retail Park



Existing Access to Retail Park



View of existing retail units, car park and corner of Waitrose Store to left and Grange Farm Close to the right



View of site from car park of retail park



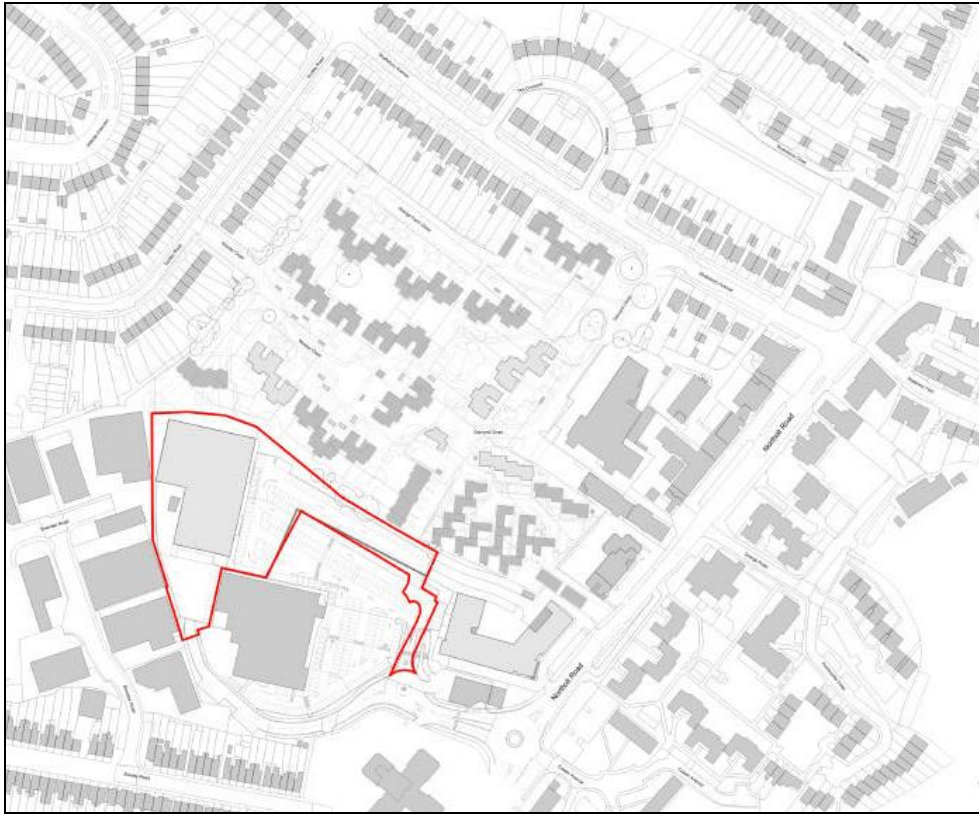
View of existing delivery and service road south-west of the site



View from Retail Park car park towards Northolt Road



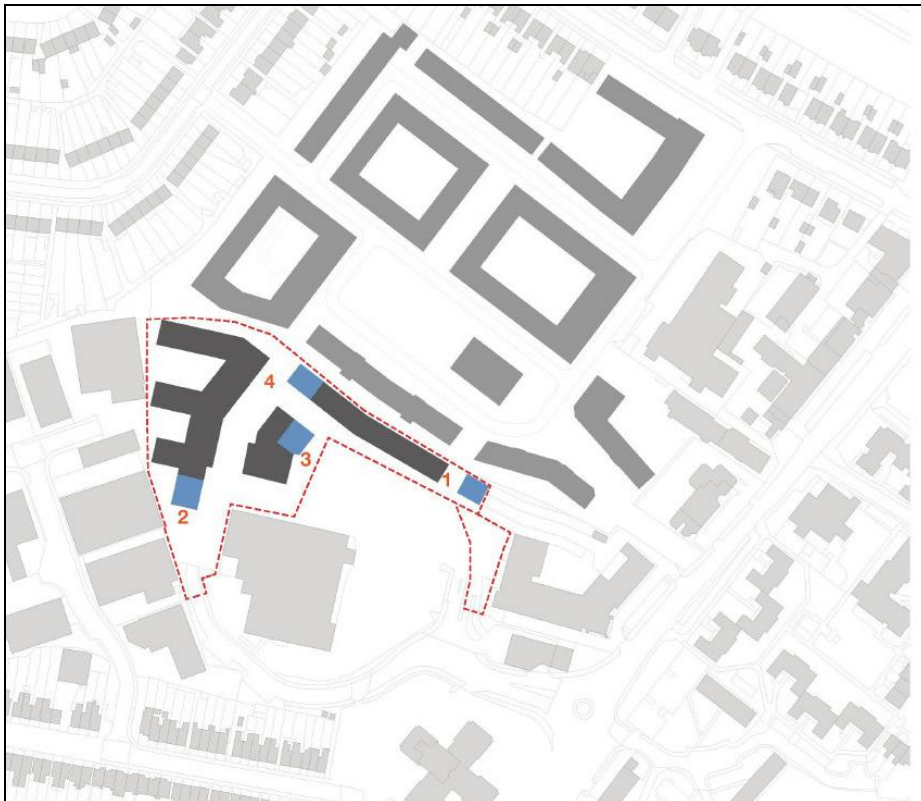
APPENDIX 3: SITE PLAN



Proposed site plan

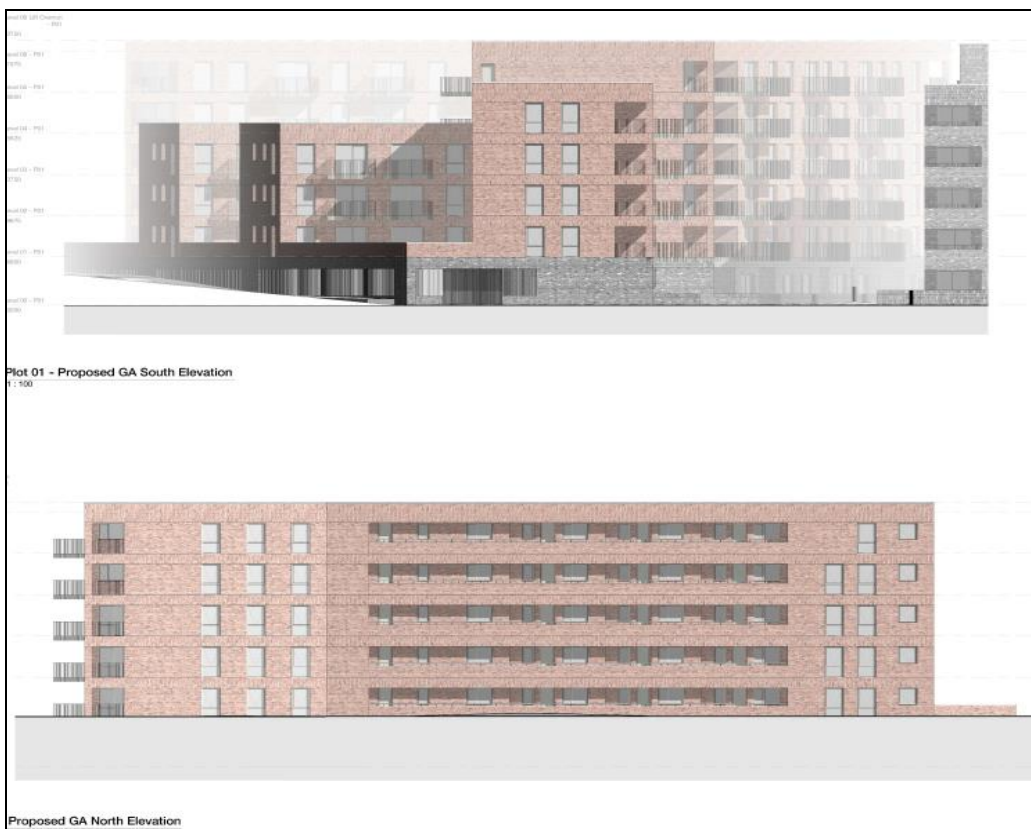


Proposed Site in context of emerging Grange Farm Development



APPENDIX 4: PLANS AND ELEVATIONS

Plot 01 (Linear block)



Plot 1A (Ground Floor)



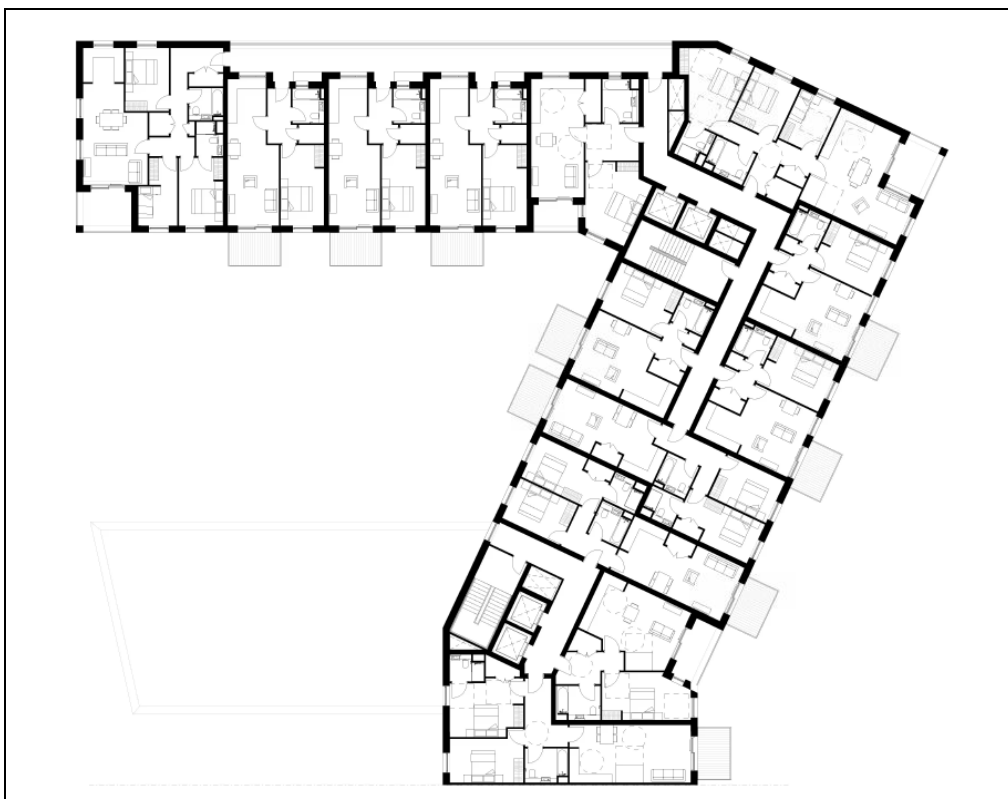
Plot 1A (Typical Upper Floor Layout)



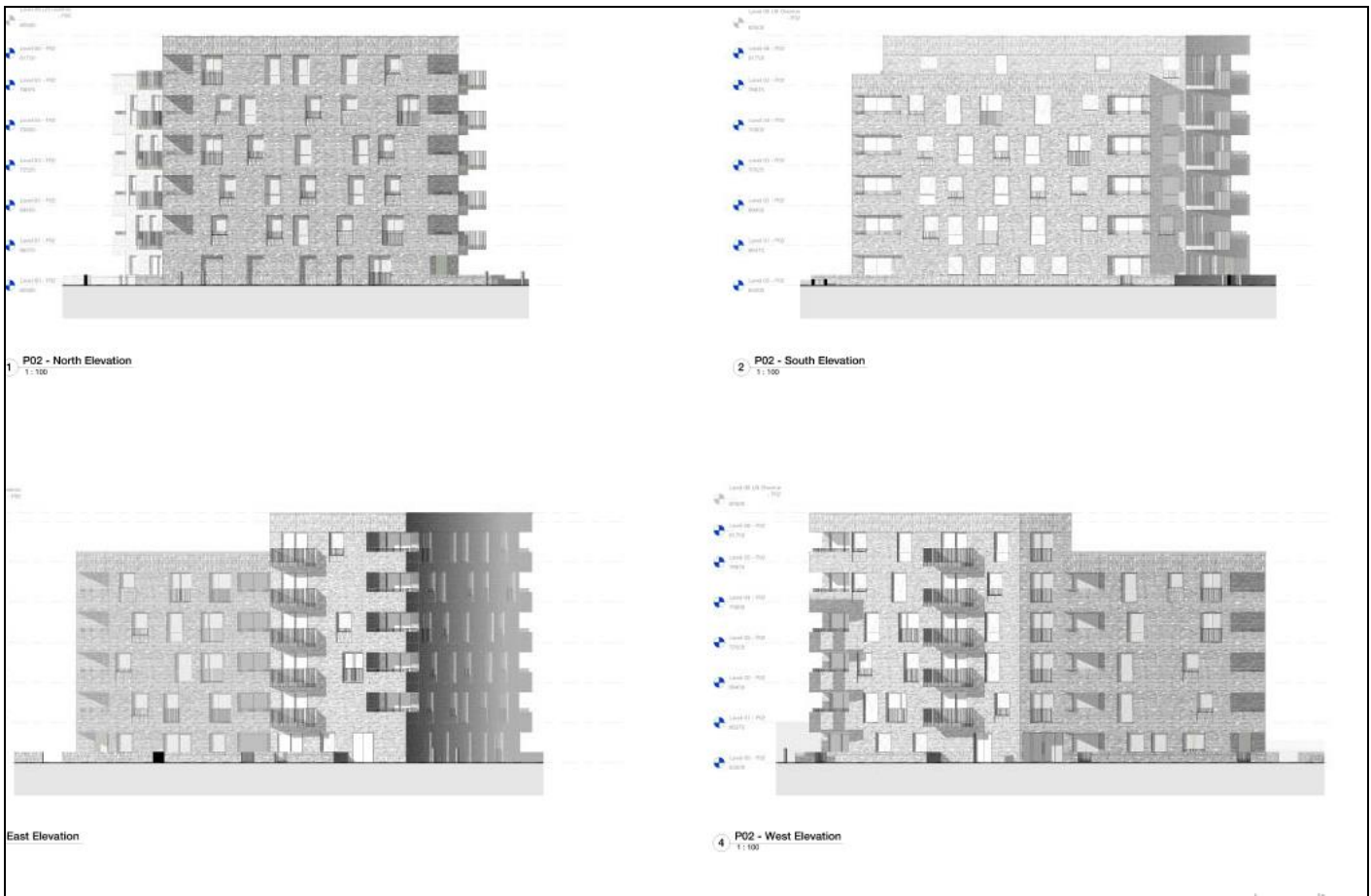
Plot 1B (Ground Floor Layout)



Plot 1B (Typical Upper Floor Layout)



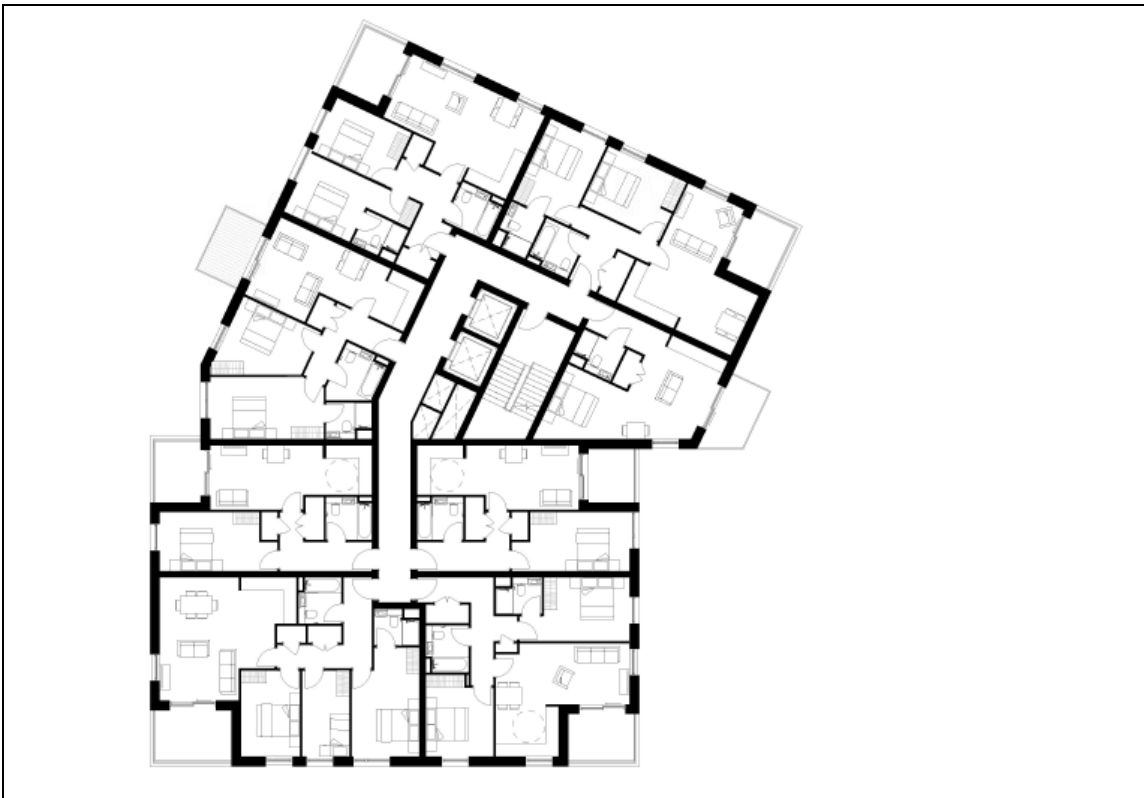
Plot 02 (Pavilion Block)



Plot 02 (Proposed Ground Floor)



Plot 02 (Typical Upper Floor Layout)



Plot 03 (Mews Block)





1 Plot 03 - Proposed GA East Elevation
1 : 100



2 Plot 03 - Proposed GA West Elevation
1 : 100

Plot 03 (Ground Floor Plan)



Plot 03 (Typical Upper Floor layout)



3D Views

Proposed Development in context of Grange Farm consented scheme



Sketch View from connection to Grange Farm towards Plots 01 and 02 (left) and View towards Plot 03 (right)



Sketch view along Mews Street (Plot 03) (Left) and Views towards Plots 01 and 02 with Grange Farm (right)



View of the steps leading to Grange Farm from a ground floor garden in Plot 01



APPENDIX 5: STAGE 1 GLA RESPONSE

GREATER LONDON AUTHORITY

Good Growth

Selina Hotwani
West Area Team
Regeneration, Enterprise and Planning
London Borough of Harrow

Our ref: GLA/2020/6010/S1/01
Your ref: P/2052/20
Date: 24 August 2020

By Email

Dear Selina

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

Northolt Road Retail Park, South Harrow

Local Planning Authority reference: P/2052/20

I refer to the copy of the above planning application, which was received from you on 09 July 2020. On 24 August 2020, Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and Skills, acting under delegated authority, considered a report on this proposal, reference GLA/2020/6010/S1/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

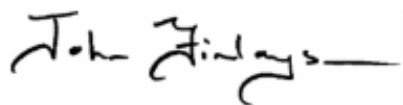
The Deputy Mayor considers that the application does not yet comply with the London Plan and the Mayor's Intend to Publish London Plan for the reasons set out in paragraph 75 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the

Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Melvyn Dresner, e-mail Melvyn.Dresner@tfl.gov.uk, telephone 07590600428.

Yours sincerely



John Finlayson
Head of Development Management

cc Navin Shah, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
Danny Calver, TfL
Sunny Desai, DP9 Ltd.

Northolt Road Retail Park, South Harrow

in the London Borough of Harrow

planning application ref: P/2052/20

<p>Strategic planning application stage 1 referral Town and Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Mayor of London) Order 2008.</p>
<p>The proposal Redevelopment of the site to provide three buildings ranging from 4-6 storeys for the provision of 191 residential units, associated landscaping, access, car and cycle parking, refuse stores and associated works.</p>
<p>The applicant The applicant is Northolt Retail Park LLP (Aitch Group). The architect is Hawkins/Brown.</p>
<p>Strategic issues Principle of development: The principle of the redevelopment of an edge-of-centre retail park to provide residential uses is supported as it optimises the land and contributes towards housing delivery, in accordance with the Mayor's Intend to Publish London Plan Policies SD6, SD7, SD8, E9 and H1. The loss of retail uses does not raise strategic concern (paragraphs 13-16). Affordable housing: The scheme proposes 10% affordable housing by habitable room, with a tenure split of 60% low-cost rent housing and 40% intermediate housing. The provision of 10% affordable housing falls significantly below the threshold level of affordable housing set out in the Mayor's Intend to Publish London Plan and, prior to the independent verification of the viability position, is wholly unacceptable. The applicant's viability assessment will be robustly scrutinised by GLA Officers to ensure the scheme provides the maximum reasonable amount of affordable housing. Early and late stage viability review mechanisms, and affordability levels should be secured (paragraphs 17-26). Design: The proposal seeks to optimise the site and the proposed building heights are sympathetic to the surrounding context. The massing of the proposed buildings could be acceptable subject to further consideration of the architectural detailing. Further consideration should be given to elements of residential quality, and further information is required in relation to the proposed play strategy. A revised fire statement must also be provided, evidencing compliance with the Mayor's Intend to Publish London Plan Policy D12 (paragraphs 30-48). Transport: Options for improved pedestrian access to the site, as well as links from the proposed on-site cycle route into wider cycle routes, should be reviewed and improved. An assessment of collision analysis should be undertaken. A delivery and servicing plan, and construction logistics plan should be secured by condition. (paragraphs 64-70). Issues relating to energy, air quality and urban greening need to be addressed.</p>
<p>Recommendation That Harrow Council be advised that the application does not yet fully comply with the London Plan and the Mayor's Intend to Publish London Plan, for the reasons set out in paragraph 75 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.</p>

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Context

1 On 9 July 2020, the Mayor of London received documents from Harrow Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town and Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan and the Intend to Publish London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1A of the Schedule to the Order 2008:

- Category 1A(1)- "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats".

3 Once Harrow Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website: www.london.gov.uk.

Site description

5 The site is 0.93 hectares in size and comprises the north-west corner of the Northolt Road Retail Park in South Harrow. The site is bound by a site known as Grange Farm Estate to the north (which received permission for comprehensive redevelopment in 2019), by a Waitrose supermarket and associated car parking to the south and east, and by industrial/retail units to the west. The site is accessed via the Northolt Retail Park's access roundabout. The site retains a right of access over the retail park's unadopted access roads. The site currently comprises existing "big-box" retail units (occupied by Dunelm, Sports Direct and Homesense retailers) and associated surface car parking. There is an existing water culvert that runs through part of the site.

6 The site does not contain any designated heritage assets and is not located within a conservation area. The site is located approximately 350 metres from the Mount Park Estate Conservation Area, approximately 300 metres from the Roxeth Hill Conservation Area and approximately 360 metres from the Grade II listed 29-37 Horn Buckle Close. The site is located within RAF Northolt's conical protected surfaces.

7 The nearest part of the Strategic Road Network is Northolt Road which is adjacent to the site. Northolt Road is served by five regular bus routes (395, 140, 116, H9 and H10), school buses and night services (N140). The nearest station is South Harrow, which is on the Piccadilly Line, approximately 400 metres from site. The highest Public Transport Accessibility Level on site is 4, on a scale of 1 to 6b, where 1 is the least accessible location and 6b the most.

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Details of the proposal

8 The proposal comprises the demolition of the existing buildings and the redevelopment of the site to provide three buildings ranging from 4-6 storeys for the provision of 191 residential unit, associated landscaping, access, parking, refuse and cycle parking, and associated works.

Case history

9 GLA officers held a pre-application meeting on this scheme on 29 January 2020. The pre-application report (reference number GLA/5400) concluded that while the proposed residential use is supported in principle, to ensure a high-quality environment for future residents, further consideration should be given to the layout of the proposed scheme, the quantum of development proposed within the site and the wider area's masterplanning. Furthermore, the pre-application concluded that the applicant should address comments made in respect of affordable housing, urban design, historic environment, inclusive access, energy, the circular economy, flood risk, sustainable drainage, water efficiency, urban greening and transport, to ensure accordance with the London Plan and the Mayor's Intend to Publish London Plan.

Strategic planning issues and relevant policies and guidance

10 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the 2012 Harrow Core Strategy, the 2013 Development Management Policies, the 2013 Site Allocations, the 2013 Harrow and Wealdstone Area Action Plan, the Joint West London Waste Plan and the London Plan 2016 (The Spatial Development Strategy for London Consolidated with Alterations since 2011)

11 The following are relevant material considerations:

- The National Planning Policy Framework (February 2019) and National Planning Practice Guidance;
- The London Plan Intend to Publish Version (December 2019) which should be taken into account on the basis explained in the NPPF;
- On the 13 March 2020, the Secretary of State issued a set of Directions under Section 337 of the Greater London Authority Act 1999 (as amended) and, to the extent that they are relevant to this particular application, have been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation; and
- The Mayor's Affordable Housing and Viability SPG.

12 The relevant issues and corresponding policies are, as follows:

- Land use London Plan; Mayor's Intend to publish London Plan;
- Housing and affordable housing London Plan; Mayor's Intend to publish London Plan; Affordable Housing and Viability SPG; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;

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- Urban design and heritage London Plan; Mayor's Intend to Publish London Plan; Shaping Neighbourhoods: Character and Context SPG;
- Inclusive design London Plan; Mayor's Intend to Publish London Plan; Accessible London: Achieving an Inclusive Environment SPG;
- Sustainable development London Plan; Mayor's Intend to Publish London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;
- Transport London Plan; the Mayor's Transport Strategy.

Principle of development

13 Spatially, the site is not located within a town centre or an opportunity area. The site is approximately 350 metres from the South Harrow Town Centre, which is classified as a District Centre within the London Plan and the Mayor's Intend to Publish London Plan. The site is therefore an out-of-centre location.

14 The proposal comprises the demolition of all on-site buildings and the redevelopment of the site for residential land uses. As existing the site comprises 2,973 sq.m. of retail warehouse (A1 Use Class), currently occupied by "big box" retailers (Dunelm, Sports Direct and Home Sense).

15 Policies SD6, SD7, SD8 and E9 of the Mayor's Intend to Publish London Plan seek to realise the potential of edge of centre sites (including existing retail parks) through mixed-use or residential development that makes the best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. Further, Policy H1 of the Mayor's Intend to Publish London Plan sets out that the redevelopment of retail and leisure parks to deliver housing intensification is encouraged. Accordingly, the principle of the introduction of residential use on this out-of-centre site is supported. In accordance with Policy SD7 of the Mayor's Intend to Publish London Plan, this net loss of retail floorspace does not raise strategic concerns.

16 London Plan Policy 3.3 'Increasing housing supply', in seeking to increase the supply of housing in London, sets borough housing targets, and in Table 3.1 sets a minimum ten-year housing supply monitoring target for the London Borough of Harrow of 5,927 additional homes between 2015 and 2025. The Mayor's Intend to Publish London Plan sets a ten-year target of 8,020 for the period 2019/2020 to 2028/2029. The increase in the housing targets identified in the Mayor's Intend to Publish London Plan evidences the continued need for housing in Harrow. The scheme proposes to deliver 194 residential units, which would contribute towards Harrow's housing targets and is supported. Affordable housing is discussed in the subsequent section of this report.

Affordable housing

17 London Plan Policy 3.12 requires boroughs to seek the maximum reasonable amount of affordable housing in all schemes. London Plan Policies 3.11 and 3.12, Policy H4 of the Mayor's Intend to Publish London Plan, as well as the Mayor's

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Affordable Housing and Viability SPG set a strategic target of 50% affordable housing in all new developments.

18 The Mayor's Affordable Housing and Viability SPG and Policy H5 of the Mayor's Intend to Publish London Plan set out the 'threshold approach' to planning applications whereby schemes that meet or exceed the relevant 35% or 50% threshold of affordable housing by habitable room without public subsidy, and meet the Mayor's preferred tenure mix, are eligible to follow the "Fast-Track Route". Generally, this means that schemes that provide 35% affordable housing by habitable room on site (or 50% for industrial and public land), without public subsidy, and meet the specified tenure mix, in accordance with Policy H5 of the Mayor's Intend to Publish London Plan, are not required to submit viability information nor be subject to a late stage review.

19 Policy H6 of the Mayor's Intend to Publish London Plan and the Mayor's Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the borough as low cost rented homes or intermediate based on identified need. There is a presumption that the 40 per cent to be decided by the borough will focus on low cost rent, however in some cases a more flexible tenure may be appropriate, for example due to viability constraints or to achieve mixed and inclusive communities. In this case, the Harrow Local Plan sets an affordable housing tenure balance of 60% social / affordable rent and 40% intermediate.

20 The scheme proposes 191 residential units of which 10% is proposed as affordable housing by habitable room (18 units). It is understood that the affordable housing proposals comprise a tenure split of 60% low-cost rented housing (London Affordable Rent) and 40% intermediate housing (shared ownership).

21 The provision of 10% affordable housing falls significantly below the 35% threshold level of affordable housing and, in the absence of a verified viability position, is unacceptable. While the proposal complies with the minimum tenure expectations set out in the Council's Local Plan and Policy H6 of the Mayor's Intend to Publish London Plan, as set out above, the overall proposed quantum of affordable does not comply with policy aspirations set out in Policies H4 and H5 of the Mayor's Intend to Publish London Plan, and is required to follow the viability tested route.

22 A Financial Viability Appraisal (FVA) has been submitted as part of the application, which is currently being scrutinised by Council and GLA officers to ensure the scheme provides the maximum viable amount of affordable housing. In accordance with the Mayor's Affordable Housing and Viability SPG, the Council is required to publish the financial viability assessment (including any reviews) to ensure transparency of information.

Viability review mechanisms

23 As with all schemes which follow the 'Viability Tested Route', the application will be subject to both early implementation and late stage viability reviews, in accordance with Policy H6 of the Mayor's Intend to Publish London Plan. Early and late-stage review mechanisms should ensure that any additional affordable housing is provided

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on-site where sufficient surplus profit is generated, in line with the Mayor's Affordable Housing and Viability SPG.

Housing affordability

24 The Mayor is committed to the delivery of genuinely affordable housing and Policy H6 of the Mayor's Intend to Publish London Plan, the Mayor's Affordable Housing and Viability SPG and the Mayor's Affordable Homes Programme 2016-21 Funding Guidance set out the Mayor's preferred affordable housing products. The applicant is advised that the Mayor's preference is for affordable rent products to be secured at London Affordable Rent benchmark levels, and for intermediate shared ownership products to be secured as affordable to a range of incomes below the upper limit of £90,000 per annum and benchmarked against the monitoring figure of £56,200 per annum in the London Plan Annual Monitoring Report. All affordable housing must be robustly secured in perpetuity, within a Section 106 agreement.

25 A draft of the S106 agreement must be agreed with GLA officers prior to any Stage II referral; example clauses are provided within the Affordable Housing and Viability SPG.

Phasing

26 The phasing of the proposed scheme should be clarified, noting that the delivery of affordable housing should be secured within the first phase of the proposed development.

Housing mix

27 London Plan Policies 3.8 and 3.11 as well as Policy H10 of the Mayor's Intend to Publish London Plan, encourage a choice of housing based on local needs with regard given to robust local evidence of need, the requirement to deliver mixed and inclusive neighbourhoods and the need to deliver a range of unit types at different price points across London.

28 The scheme proposes 191 residential units with a range of typologies and tenures, as detailed in the table below:

Unit Type	Studio	1-Bed, 2 Person	2-Bed, Four Person	3-Bed, Five Person*	Total
	10 5%	83 43%	70 37%	28 15%	191 100%

*8 of which are provided as maisonettes.

29 The housing mix comprises a range of unit sizes including studios, 1-beds, 2-beds and 3-beds. Subject to the Council confirming the proposed mix meets the local need of the Borough, GLA Officers are supportive of the housing mix from a strategic perspective.

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Urban design

30 The design principles in chapter seven of the London Plan and chapter 3 of the Mayor's Intend to Publish London Plan expect all developments to achieve a high standard of design which responds to local character, enhances the public realm and provides architecture of the highest quality.

31 London Plan Policy 3.4 and Policy D3 of the Mayor's Intend to Publish London Plan seek to optimise the potential of sites. As per Policy D3 of the Mayor's Intend to Publish London Plan, a design-led approach to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth.

Height, massing and architecture

32 The proposed height of the development (up to 6 storeys) has been designed to fit within the restrictions of the conical surface for RAF Northolt. The proposed height is accordingly sympathetic to the surrounding context, and it is noted the consented redevelopment of Grange Farm Estate, which is located to north of the site, fits within this same context.

33 The development has been designed to optimise the site and comprises three main plots, which are located between the Grange Farm Estate to the north and the carpark operated and managed by the neighbouring Waitrose to the south and south-east. On Plot 1, the building is located to the west and frames three courtyards; on Plot 2 a pavilion block located in the centre of the site; and on Plot 3, a linear mews steps down in height along the northern boundary of the site. The proposed massing of the proposed buildings could be acceptable subject to further consideration of the architectural detailing. Specifically, noting the length and lack of variety along the Plot 1 and Plot 3 façades, consideration should be given to the creation of added interest with further variations in materials or vertical articulation along the respective elevations. The use of brick as the primary building material is nonetheless strongly supported, and the proposed differences in brick colour between the three different plots will create some variation across the site. The material detailing should be secured through the grant of any planning permission.

Layout

34 The use of the south-west corner of the site for vehicle access is supported, as it removes the majority of vehicles from the site (with the exception of service vehicles) and creates a predominantly pedestrianised environment. The creation of pedestrian access between the proposed site and the Grange Farm Estate to the north is strongly supported, as it provides pedestrian permeability and improved access for residents of the development, and residents in the surrounding area. This access should be secured by the Council. High quality planting, paving and lighting should be secured by the Council, and a maintenance / management strategy for this space should be secured.

35 The provision of high-quality landscaped spaces and public realm is supported and should be secured. As further discussed in the play space and transport sections of this report, to ensure the safe function of the pedestrian, play and servicing road through the middle of the site, pedestrian, cyclist and vehicle conflict should be

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avoided through securing of suitable mitigation and a legible route. Suitable wayfinding signage and mitigation should be secured.

Residential quality

36 London Plan Policy 3.5 and Policy D6 of the Mayor's Intend to Publish London Plan promote quality in new housing provision, with further guidance provided by the Housing SPG.

37 The proposals set out that all the units and room sizes meet or exceed minimum room standards. The proposed development will include a range of private and communal amenity spaces. The Council should also secure high-quality landscaping features within these communal and publicly accessible areas, including areas for rest and shade. Private external space is proposed for each unit in the form of balconies, terraces and private gardens, with a minimum of 5sqm of private amenity space per 1-2 bed dwelling and an extra 1sqm per additional occupant.

38 Across the scheme, 78% of units are dual aspect. While this number is relatively low, it is noted that there are no single aspect, north-facing units proposed. Furthermore, as the scheme has been designed with a pedestrian / cycle / play street through its centre, meaning that single aspect units that overlook this street are still provided with a relatively quiet aspect. Noting the proximity of the units within Plot 2 and 3 to the neighbouring Waitrose carpark, the Council should secure sufficient landscaping to provide a buffer and sufficient levels of privacy, particularly for the ground floor units and habitable rooms. Taking into account the noise considerations (further discussed in the Agent of Change section of this report), it is considered the scheme is broadly acceptable in respect of aspect.

39 The core within Plot 1 serves a maximum of 10 apartments per floor. While the applicant states that this has been reduced wherever possible, it is unclear why this floorplate is acceptable in this instance, and the number of units per core should be further reduced, in line with the Housing SPG. All other plots serve a maximum of 8 units per core which accord with Standard 12 of the Housing SPG (March 2016). The design and access statement states that all cores receive natural light and adequate ventilation. It is unclear how this is achieved in all the proposed blocks and this should be addressed by the applicant.

Play space

40 London Plan Policy 3.6 and Policy S4 of the Mayor's Intend to Publish London Plan seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child.

41 While the application documents state out that the proposal generates a requirement of 350 sq.m. of play space using the GLA play space calculator, further information is required to enable GLA officers to assess the play space. The tenure breakdown has not been provided by unit and the information in the relevant section of the Design and Access statement is not legible due to image quality.

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42 The proposed development includes a total of 400 sq.m of play space comprising equipped and informal play spaces located in a range of locations throughout the scheme. Specifically, door-step playable space is provided at podium level in communal courtyards and in public space. Informal play space for the 0-5 age bracket is proposed within one communal courtyard of Plot A and within a publicly accessible space. Equipped playable spaces are proposed within one communal courtyard of Plot A and within two publicly accessible play spaces. The documents also indicate play space will be provided within a "play street".

43 The provision of on-site high quality, safe, playable features for children, as well as safety measures and shaded spaces, should be secured by the Council via condition or S106 obligation. Noting that the "play street" will also be used by pedestrians, cyclists and access vehicles, mitigation measures to avoid user conflicts within this space should be secured by the Council.

44 The play strategy indicates that space for older children is proposed within the neighbouring, approved Grange Farm Estate redevelopment. The applicant is required to demonstrate that the off-site play space fully satisfies the needs of the proposed development whilst meeting the needs of residents within the approved development. Subject to addressing this requirement of the SPG, the Council should secure the off-site play provision (comprising the creation of new provision, improvements to existing/emerging play facilities and/or an appropriate financial contribution) within a S106 agreement.

45 The location of the proposed affordable housing within the scheme is required to be clarified. In accordance with Policy S4 of the Mayor's Intend to Publish London Plan, the applicant must demonstrate that the proposed play space within the communal courtyards of Plot A is not segregated by tenure and this must be secured within any planning permission.

Fire safety

46 A fire statement has been provided with the planning application, however the statement provided does not meet the requirements of Policy D12 (part B1-6) of the Mayor's Intend to Publish London Plan. Notably, the fire statement should detail the qualifications of the assessor who has prepared the document; this should be specified within the statement. Furthermore, the statement has been prepared to confirm that the proposed development will be built to comply with the functional requirements of the Building Regulations; this does not address the policy requirements of Policy D12 of the Mayor's Intend to Publish London Plan which, in the interests of fire safety and to ensure the safety of all building users, seeks to ensure that development proposals achieve the highest standards of fire safety.

47 A revised fire statement should be secured which clearly address (in appropriate sections) the requirements outlined in Policy D12 (part B, 1-6) of the Mayor's Intend to Publish London Plan, including: construction methods and materials; means of escape for all building users; fire safety features, which reduce the risk to life; access for fire service personnel and equipment; access within the site for fire appliances; and how potential future modifications to the building will take into account, and not comprise, the base build fire safety and protection measures. Furthermore, Policy D5(b) of the Mayor's Intend to Publish London Plan sets out that,

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in all developments where lifts are installed, a minimum of one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift; this should be suitable for use to evacuate people who require level access from the building and should be addressed and secured within the revised fire statement.

Agent of Change

48 Policy D13 of the Mayor's Intend to Publish London Plan states that the Agent of Change principle places the responsibility for mitigating impacts from existing noise (and other nuisance-generating activities or uses) on the proposed new noise-sensitive development. Furthermore, it states that development proposals: should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances; explore mitigation measures early in the design stage, with necessary and appropriate provisions, including ongoing and future management of mitigation measures secured through planning obligations; and separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, and insulation and other acoustic design measures.

49 Due to the proximity of the neighbouring industrial uses located to the west of the site, and the introduction of residential land uses within the proposed development, Policy D13 is applicable to the proposed scheme. The application sets out that this principle has been considered in the design development of the proposal, with units located within Plot 1, at the closest point, benefiting from triple aspect as well as two primary frontages facing away from the industrial estate. Furthermore, the proposals incorporate acoustic fencing along the western boundary, and the incorporation of solid balconies screening of at least 1.2 metres to ensure that the proposed amenity spaces would be of a good quality in respect of the acoustic environment. The Council should secure mitigation measures accordingly.

Heritage

50 London Plan Policy 7.8 and Policy HC1 of the Mayor's Intend to Publish London Plan state that development should conserve heritage assets and avoid harm. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". The NPPF states that, when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

51 Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Any harm must be given considerable importance and weight.

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52 The site does not contain any designated heritage assets nor is the site located within a conservation area. There are no statutorily listed buildings or structures in immediate proximity to the site, however the site is located approximately 350 metres from the Mount Park Estate Conservation Area, approximately 300 metres from the Roxeth Hill Conservation Area and approximately 360 metres from the Grade II listed 29-37 Horn Buckle Close.

53 Due to the distance of the proposed development to the designated heritage assets, the proposed development's built form, and the relative scale and character of the surrounding urban form, it is not anticipated the proposed development would be visible in conjunction with the designated heritage assets and therefore would introduce no change to the respective settings of the heritage assets.

54 Having regard to the statutory duties in respect of listed buildings and conservation areas in the Planning (Listed Buildings and Conservation Areas) Act 1990, and NPPF requirements in relation to listed buildings, structures and conservation areas, GLA officers are satisfied that no harm will arise to the nearby designated heritage assets through the delivery of the proposed scheme.

55 It is considered that the proposed development is generally sympathetic to the form and scale of the surrounding context, including the nearby designated heritage assets (as considered above), and the scheme is considered to accord with London Plan Policy 7.8. and Policy HC1 of the Mayor's Intend to Publish London Plan.

Inclusive design

56 London Plan Policy 7.2 and Policy D5 of the Mayor's Intend to Publish London Plan require that all new development achieves the highest standard of accessible and inclusive design and can be used safely, easily and with dignity by all. London Plan Policy 3.8 and Policy D7 of the Mayor's Intend to Publish London Plan requires that 90% of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and 10% meets Building Regulation requirement M4(3) 'wheelchair user dwellings', that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

57 The proposal states that all units have been designed to meet M4(2) requirements and 10% of units would meet M4(3) requirements. The Council should secure policy compliant levels of accessible dwellings through to the delivery stage, and that these M4(3) units are provided across a variety of housing typologies, tenure and locations within the scheme to give disabled and older people similar choices to non-disabled people.

58 As detailed in the Fire Safety section of this report, a minimum of at least one lift per core (or more subject to capacity assessments) must be a suitably sized fire evacuation lift, suitable to be used to evacuate people who require level access from the building, in accordance with Policy D5 of the Mayor's Intend to Publish London Plan.

Environment

Energy

59 Further information is required in respect of a number of elements of the energy strategy to ensure compliance with the London Plan and Mayor's Intend to Publish London Plan. This includes information in relation to the decarbonisation strategy, Be Clean, Be Lean and Be Green elements, carbon performance and offsetting. Detailed technical comments in respect of energy have been circulated to the Council and applicant under a separate cover to be addressed in their entirety.

Air quality

60 The proposed development is predicted to result in a reduction in vehicle movements compared to the site's existing use, and it has been assumed that the development will not lead to adverse impacts on local air quality. The assessment has also shown that air quality for future residents of the proposed development will be acceptable.

61 The proposed development is, however, not air quality neutral and exceeds the transport emissions benchmark (TEB), and therefore does not comply with London Plan Policy 7.14 (part B(c)) and the Mayor's Intend to Publish London Plan Policy SI 1 (part B) 2a). The applicant must provide a scheme of mitigation, appropriate in scale, to address the exceedance of the TEB, or address the exceedance of the TEB in scheme design (i.e. reduce vehicle trips associated with the development).

62 The proposed development will include a communal gas boiler prior to connection to a district heat network. An assessment of the gas boiler has not been carried out as details are not yet available, however this will need to be assessed prior to occupation of the proposed development. A pre-occupation condition should be secured requiring an assessment of the impacts of the communal boiler to ensure that there are no adverse impacts on air quality at existing locations, and that future occupants are not adversely impacted by its emissions and to ensure compliance with Policy 7.14 (part B) and Policy SI 1 (part B) of the Mayor's Intend to Publish Policy.

63 Compliance with the Non-Road Mobile Machinery (NRMM) Low Emission Zone for London during the construction phase should be appropriately secured, to ensure compliance with Policy 7.14 (part Bb) and Intend to Publish Policy SI 1 (part D). Measures to control emissions during construction and demolition must be appropriately secured and implemented during the construction phase, as per paragraph 6.2 of the air quality assessment, to ensure compliance with Policy 7.14 (part Bb) and Intend to Publish Policy SI 1 (part D).

Urban greening and trees

64 The applicant has calculated the Urban Greening Factor (UGF) of the proposed development as 0.4, which meets the target set by Policy G5 of the Mayor's Intend to Publish London Plan. The green roofs shown for the UGF calculation do not appear to have been included in any of the planning drawings. The applicant should

clarify this and submit detailed drawings showing the location and design of the green roofs.

Transport

65 It is proposed to provide 0.35 car parking spaces per unit; the approach to car parking is acceptable. The provision for Blue Badge parking and Electric Vehicle Charging Points is in line with the Mayor's Intend to Publish London and should be secured.

Active travel and Healthy Streets

66 The provision of pedestrian and cycle links on site, and connections to the neighbouring Grange Farm Estate, are supported and should be secured. Removing or adjusting individual parking bays of the Waitrose car park could allow for improved pedestrian links between the store, the development site and Grange Farm Estate. As such, it is recommended that options between Waitrose and the applicant are explored.

67 The level of cycle parking and its design accords with the London Cycle Design Standards and the Mayor's Intend to Publish London Plan policy and should be secured by condition.

68 The Road Safety Audit should be reviewed by the local highway authority. An assessment of collision analysis should be undertaken to ensure the scheme aligns with the Mayor's Vision Zero Action Plan.

69 An Active Travel Zone assessment is included in the Transport Assessment which shows the local environment generally scores well. This should be confirmed by the local highway authority. It is not clear how the on-site cycle route links into wider cycle routes. The applicant should work with the local authority to ensure the proposed development links into any nearby active travel improvement proposals.

Delivery and servicing plan

70 The assessment and measures proposed in the Transport Assessment to manage deliveries and servicing are supported and should be secured by condition.

71 An outline Construction Logistic Plan has been provided and should be secured by condition.

Local planning authority's position

72 GLA Officers understand that Harrow Council planning officers have engaged in pre-application discussions with the applicant and are currently undertaking an assessment of the submitted planning application, including the viability information. The committee date is not yet known.

Legal considerations

73 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

74 There are no financial considerations at this stage.

Conclusion

75 London Plan and the Mayor's Intend to Publish London Plan policies on land uses, housing, affordable housing, urban design, play space, Agent of Change, heritage, inclusive design, energy, air quality, urban greening and transport are relevant to this application. The below issues must be addressed to ensure the proposal complies with the London Plan and the Mayor's Intend to Publish London Plan:

- **Principle of development:** The principle of the redevelopment of an edge-of-centre retail park to provide residential uses is supported as it optimises the land and contributes towards housing delivery, in accordance with the Mayor's Intend to Publish London Plan Policies SD6, SD7, SD8, E9 and H1. The loss of retail uses does not raise strategic concern.
- **Affordable housing:** The scheme proposes 10% affordable housing by habitable room, with a tenure split of 60% low-cost rent housing and 40% intermediate housing. The provision of 10% affordable housing falls significantly below the threshold level of affordable housing set out in the Mayor's Intend to Publish London Plan and, prior to the independent verification of the viability position, is wholly unacceptable. The applicant's viability assessment will be robustly scrutinised by GLA Officers to ensure the scheme provides the maximum reasonable amount of affordable housing. Early and late stage viability review mechanisms, and affordability levels should be secured.
- **Design:** The proposal seeks to optimise the site and the proposed building heights are sympathetic to the surrounding context. The massing of the proposed buildings could be acceptable subject to further consideration of the architectural detailing. Further consideration should be given to elements of residential quality, and further information is required in relation to the proposed play strategy. A revised fire statement must also be provided, evidencing compliance with Intend to Publish London Plan Policy D12.

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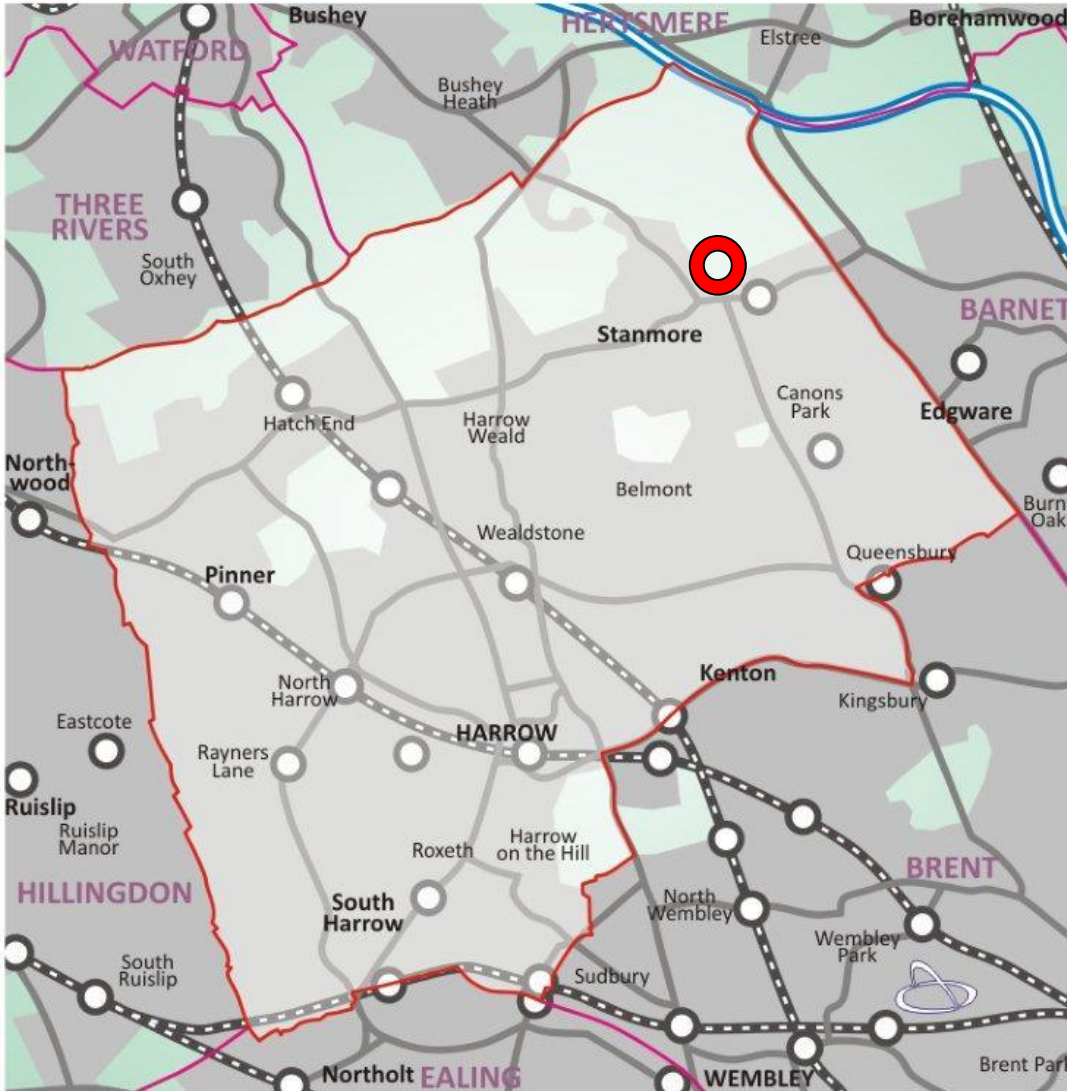
- **Energy:** Further information is required in respect of a number of elements of the energy strategy to ensure compliance with the London Plan and Mayor's Intend to Publish London Plan. This includes information in relation to the decarbonisation strategy, Be Clean, Be Lean and Be Green elements, carbon performance and offsetting.
- **Air quality:** The proposed development is not air quality neutral and exceeds the transport emissions benchmark (TEB). A scheme of mitigation, which is appropriate in scale, must be provided to address the exceedance of the TEB, or address the exceedance of the TEB in scheme design. Conditions should be imposed to ensure the development does not lead to adverse impacts on local air quality.
- **Urban greening:** The green roofs shown for the UGF calculation do not appear to have been included in any of the planning drawings. The applicant should clarify this and submit detailed drawings showing the location and design of the green roofs.
- **Transport:** Options for improved pedestrian access to the site, as well as links from the proposed on-site cycle route into wider cycle routes, should be reviewed and improved. An assessment of collision analysis should be undertaken. A delivery and servicing plan, and construction logistics plan should be secured by condition.

for further information, contact GLA Planning Unit (Development Management):

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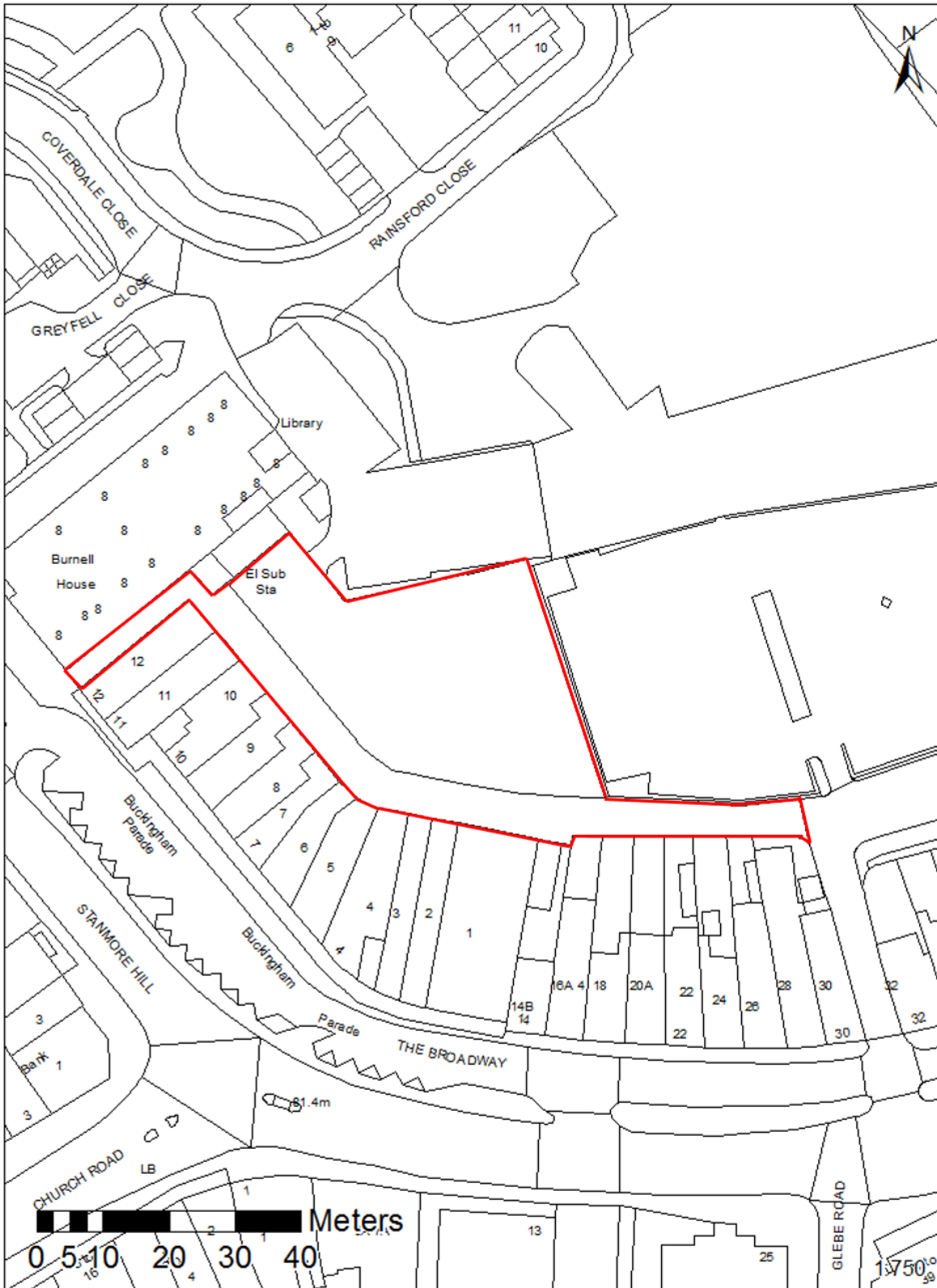
Agenda Item: 2/01

 = application site



CAR PARK: SOUTH OF THE FORMER ANMER LODGE, HA7 4EB P/3109/20

LAND SOUTH OF ANMER LODGE



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**LONDON BOROUGH OF HARROW
PLANNING COMMITTEE**

20th January 2021

APPLICATION NUMBER: P/3109/20
VALID DATE: 21st SEPTEMBER 2020
LOCATION: LAND SOUTH OF ANMER LODGE, COVERDALE
CLOSE (CAR PARK R/O BUCKINGHAM PARADE,
THE BROADWAY
WARD: STANMORE PARK
POSTCODE: HA7 4EB
APPLICANT: STANMORE PROPERTY DEVELOPMENTS LTD
AGENT: DESIGN COLLECT
CASE OFFICER: NABEEL KASMANI
EXTENDED EXPIRY DATE: 22nd JANUARY 2020

PROPOSAL

Redevelopment to provide a six storey building comprising of office floor space on the first floor (use class E) and 9 flats (2 x 3 bed, 5 x 2 bed and 2 x 1 bed) on second, third, fourth and fifth floors; parking; bin and cycle stores

RECOMMENDATION

The Planning Committee is asked to:

- 1) agree the reasons for approval as set out in this report, and
- 2) grant planning permission subject to the conditions listed in Appendix 1 of this report:

REASON FOR THE RECOMMENDATIONS

The proposal would respond to the strategic objective of optimising the potential for growth on sustainable brownfield sites within Town Centre locations. The proposed development would appropriately relate to the site, local context, massing and architectural appearance and would bring forward housing provision of a satisfactory layout and design to ensure that the future occupiers would benefit from an acceptable standard of living accommodation.

Given the Town Centre location of the application site, officers are satisfied that the proposal would maintain an appropriate quality of residential amenity for the adjoining occupiers. The proposal would enhance biodiversity on the site, provide sustainable urban drainage measures, improve access routes and provide high-quality hard and soft

landscaping. Furthermore, the transport aspects of this proposal are considered to be in accordance with strategic and local transport policies.

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

INFORMATION

This application is reported to Planning Committee as it would provide the construction of more than three dwellings and therefore falls outside category 1(b) of Schedule 1 of the Scheme of Delegation.

This application was reported to committee in December 2020 and it was deferred for a Members' site visit.

Statutory Return Type:	(E)13 Minor Dwellings
Council Interest:	n/a
Net Additional Floorspace:	1027m ²
GLA Community	
Infrastructure Levy (CIL):	£61,620
Local CIL requirement:	£124,677

HUMAN RIGHTS ACT

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

EQUALITIES

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

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

S17 Crime & Disorder Act

Policies 7.3.B and 7.13.B of The London Plan and Policy DM1 of the Development Management Policies Local Plan require all new developments to have regard to safety and the measures to reduce crime in the design of development proposal. It is considered that the proposed access does not adversely affect crime risk.

1.0 SITE DESCRIPTION

- 1.1 The application site consists of a parcel of land located to the south of the former Anmer Lodge, the west of Burnell House and north of Buckingham House. The site currently comprises a hard surface car park for permit holders of the adjacent residential and commercial uses.
- 1.2 To the south of the application site is Buckingham Parade, a three storey building incorporating a mansard roof with commercial uses on the ground floor and residential uses on the upper floor. A commercial road serving the rear of the commercial units adjoins the application site immediately to the south. The refuse/cycle stores and designated blue-badge parking bays for some of the residential flats within Buckingham House East are located within the application site.
- 1.3 Sited adjacent to the north of the application site is Burnell House, a rectangular three storey detached building. Stanmore Library is located on the ground floor and residential flats (formerly offices) occupy the first and second floor and within the roof.
- 1.4 The application site is located within the Stanmore Town Centre and is within a Critical Drainage Area. The application site is also within the protected views setting corridor of Wood Farm Country Park
- 1.5 The application site has a public transport accessibility rating (PTAL) of 3

2.0 PROPOSAL

- 2.1 The application proposes a new five-storey building. As a result of the change in levels of the site, the proposal incorporates a lower ground and upper ground level. The lower ground level would feature the refuse and cycle bins, 19 parking spaces and a car lift. The proposed upper ground level would provide a further 16 car parking spaces.
- 2.2 The proposed first-floor would provide 336m² of commercial floorspace (Use Class E). Three residential units would be provided each within the second and third floors, two residential units on the fourth floor (including a duplex unit) and one residential unit on the fifth floor.
- 2.3 The proposed development would feature the following housing mix: 2 x 1 bed, two person units, 1 x 2 bed 3 person units, 4 x 2 bed four person units and 2 x 3 bed 6 person units.
- 2.4 The proposed building would have a broadly 'L-shaped' layout with staggered elevation projections on the south facing elevation. The proposed fifth floor would also be recessed and the proposed building would feature a flat roof profile.

- 2.5 A terrace/podium garden would be provided above the ground floor car park accessed by the commercial unit and entrance on the first floor. The overhang of has been removed during the course of the application. The proposal would also provide a pocket garden to the north-west part of the application site adjacent to the substation.
- 2.6 The proposed development would re-provide 15 car parking spaces related to the existing leases for commercial uses within Buckingham Parade. Furthermore, the proposal would provide 11 parking bays, 68 cycle spaces and refuse storage for the residential units within Buckingham House which are currently provided on the application site. The proposal would provide 7 parking spaces for the new flats and 2 parking spaces for the proposed commercial use.
- 2.7 Following the previously refused scheme, the proposal seeks to provide the primary pedestrian access via the service road which adjoins the site along the southern boundary of the site. During the course of the application, amendments have been made to the design of the access route including a uniform paving material to slow traffic and make the road a pedestrian priority, introduction of a turning head and remove the curved path towards the north-west of the application site. Minor internal amendments have been made to the layout of some of the flats and external fenestration details. The curved suspended decking serving the commercial unit has also been removed.
- 2.8 The previous application was previously refused because of the poor primary residential access to the site and the failure of the proposal to optimise the housing potential of the site through an inefficient layout and housing mix. The subject application therefore seeks to address these reasons for refusal.

3.0 RELEVANT PLANNING HISTORY

Ref no.	Description	Status & date of decision
P/5253/19	Development Of A Five-Storey Building To Provide 302 Sqm Commercial Office Space (Use Class B1A) Nine Residential Dwellings (Use Class C3) Undercroft Parking Refuse And Cycle Storage And Landscaping.	Refused: 25/02/2020 Appeal Dismissed: 02/12/2020
<p>Reasons for Refusal:</p> <p>1. The proposed development, by reason of its location and the unsuitable pedestrian access to the site, would fail to provide a high standard of design and layout for the development, fail to meet the objectives of lifetime neighbourhoods and would not create safe, secure and appropriately accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or community cohesion, to the detriment of the living conditions of the future occupiers of the</p>		

proposed residential units, contrary to the high quality design aspirations of the National Planning Policy Framework (2019), policies 3.5, 7.1, 7.3, 7.4 and 7.6 of the London Plan (2016), Policy CS1E of the Harrow Core Strategy (2012), Policies DM1, DM2 and DM22 of the Harrow Development Management Policies Local Plan (2013), the adopted Supplementary Planning Document: Residential Design Guide (2010) and the Mayors Housing SPG (2016).

2. The proposed development, by reason of its housing mix and inefficient layout, would fail to optimise the housing potential of the site and therefore undermine the Council's strategic objective to provide the maximum reasonable level of affordable housing to the Boroughs housing stock. The proposal therefore fails to address the key aims of Policies 3.11 and 3.13 of the London Plan (2016), Policy CS1J of the Harrow Core Strategy (2012), Policy DM24 of the Development Management Policies Local Plan (2013) the Mayors Housing SPG (2016), the Mayors Affordable Housing SPG (2017) and adopted Supplementary Planning Document: Planning Obligations and Affordable Housing (2013).

Relevant Planning History on Adjacent Sites

P/0412/14	Redevelopment of Anmer Lodge & Stanmore car park site in four blocks of various heights: block a to provide 1,692 sq. m (gross) food retail store (class a1) with ancillary café and 3-5 storeys of flats over; block b to provide multi storey car park and 3-4 storeys of flats over; block c to comprise 3-6 storeys of flats with undercroft parking; block d to comprise 2-4 storeys of houses and flats with surface car parking; basement car park below blocks a & b; total 120 dwellings (class c3) (resident permit restricted); 294 car parking spaces (comprising 151 replacement spaces, 50 spaces for the food store and 93 spaces for residents), 8 motorcycle spaces and 144 cycle spaces; access from Dennis lane and Coverdale close. proposal also includes combined heat & power plant; landscaping & roof gardens; diversion of water culvert; works to provide temporary replacement town centre car park (minimum of 151 spaces) and demolition of Anmer Lodge	Grant: 22/08/2014
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P/0514/15 (Buckingham House West)	Conversion of offices on first and second floors (class b1a) to 10 self-contained flats (class c3) (prior approval of transport & highways impacts of the development and of contamination risks and flooding on the site)	Grant: 13/03/2015
P/1470/17/Prior (Burnell House)	Conversion of first and second floor offices (class b1a) and roof void to 39 self-contained flats (class c3) (prior approval of transport & highways impacts of the development contamination and flooding risks on the site and impacts of noise)	Grant: 07/07/2017
P/4904/17 (Buckingham House East)	Creation of third floor to provide additional nine flats (use class c3); external alterations	Grant: 18/06/2018
P/2888/18/Prior (Buckingham House East)	Conversion of offices (class b1) on part first floor and second floor to 23 self-contained flats (class c3) (prior approval of transport & highways impacts of the development and of contamination risks and flooding risks on the site and impacts of noise)	Grant: 21/08/2018

4.0 **CONSULTATION**

- 4.1 A total of 161 consultation letters were sent to neighbouring properties regarding this application on 12th October 2020. A re-consultation was also undertaken on 4th November 2020 for minor amendments made to the proposal during the course of the application.
- 4.2 Two general site notices were placed outside the application site on 15th October 2020
- 4.3 A total of 43 objections by neighbouring residents and a petition with 47 signatures from the occupiers of Buckingham House East and West have also been submitted. A summary of the responses received are set out below with officer comments in Italics:

Summary of Comments on original consultation

Character and Appearance:

over-intensification, too large, massing is far greater than necessary, protected view from wood farm could be compromised, overdevelopment, out of character; site not designated for development; better access required for main access; previous refusal for access remains valid;

These comments have been addressed within the report.

Residential Amenity:

loss of light/outlook, overshadowing, loss of privacy, noise during construction/servicing, smell/smoke/gasses from hazardous materials used in construction and health implications, pollution, impact on Burnell House not adequately assessed in daylight and sunlight assessment; limited view to park will be lost; noise impact working from home; eyesore; will prevent individuals 'right to light; angled windows on facing Notting Hill Development but not towards Burnell House; use of terraces for storage or laundry will have a further negative impact on local residents

These comments have been addressed within the report.

Trees/Landscaping and Environment:

loss of trees and green space; will damage environment; increased carbon footprint; increased energy use and carbon footprint of Burnell House residents; increased carbon footprint; adjacent residents benefit from solar gain and which will result in increase in energy bills; air/noise/rubbish pollution

As noted within the report, conditions are required for biodiversity enhancements. The potential impacts on the energy use within Burnell House is acknowledged, but currently this is obtained through 'borrowed light' beyond the application site by virtue of the absence of development within the application site. This therefore should not be a determinative factor and would not be weighed against the benefits of the subject proposal. It is not likely that the proposal would generate more air/noise/rubbish pollution than any other development of a similar size

Traffic and Parking:

more congestion and traffic, extra parking on surrounding roads, impact on highway safety for service access points, no contingency arrangements if car lift fails, parking spaces for leaseholders on site would be affected; not enough turning space for delivery vehicles; More congestion on Stanmore; parking an issue in the area; no where for residents to park with leases during construction; *The Council's Highways Officer is satisfied with regard to the impact of the proposal on parking stress on adjacent roads and parking/cycle provision on site. The relocation of leased spaces during construction is a civil matter*

Other:

devalue property value, risk of antisocial behaviour/crime, not demonstrated adequacy to deal with fire tenders/fire assembly points, at the time of purchase estate agent said no further buildings would be built; Stanmore will become more congested and people will stop using shop and facilities leading to business closures; density yields are disingenuous as they do not account for inefficiency of re-providing the existing facilities; should wait for the planning appeal decision first; flats in Buckingham house not consulted; site could provide more efficient development and affordable housing; no need for additional residential and commercial space

The impact of the development on property value is not a material planning consideration; the impact on crime has been detailed within the report; the requirement to meet with fire regulations is a matter for building control; the council did notify the relevant statutory consultees and site notices were placed

in the vicinity, the proposed car/cycle and refuse facilities serving Buckingham House would be reprovided on site; there is no sustained evidence that the proposal would lead to reduced vitality of Stanmore town centre; officers consider that the applicant has satisfactorily addressed the reasons for refusal of the previous application and therefore it is not necessary to wait for the appeal decision before determining this application;

4.4 Statutory and Non-Statutory Consultation

4.5 The following consultations have been undertaken and a summary of the consultation responses received are set out below.

Consultee and Summary of Comments

LBH Highways

The site is currently operating as a car park serving the commercial properties fronting The Broadway and providing residential spaces for some flats above these businesses. The proposal seeks to re-provide the 27 leased commercial and residential spaces within the proposed car park and provide a further 8 spaces for the new development. This is broadly acceptable as the existing spaces do not directly relate to the new proposals; it must however be made clear that the 27 spaces are to be used for the intended purpose only and are not transferable to the new development uses.

The existing car park is adjacent a general servicing area at the rear of shops – deliveries and refuse collections take place along the access road. The proposal seeks to improve the service road by introducing a raised shared surface with a dedicated pedestrian path which also includes an improved pedestrian link from the site to the The Broadway. It is most important that safety around manoeuvring HGV's is achieved. The access road must be a minimum of 4.8m to be acceptable as a shared surface in line with Harrow's Street Design Guide, however it is indicated that it reduces to 4.5m in places.

Furthermore, the adjacent former Anmer Lodge site has an obligation for highway works to be undertaken on the service road outside of this development site, therefore, it will be necessary to ensure that the design of the road layout can tie in with the highway works. At this stage, nothing has been formally designed but it is considered relevant to note the requirement.

The travel plan statement indicates that the development will be car free however, the Transport Statement includes 8 car parking spaces for the new development – either is acceptable but requires some clarification on how spaces are to be allocated if provided. If any are for the office, some should be disabled bays. The location of spaces for each use need to be set out in a car park design and management plan – this also needs to show where active EV charge points are located and where passive provision will be plus how these can be activated should demand increase and how parking will be managed and enforced.

More detail on the proposed cycle parking facilities is required. The short stay for all elements of the proposal should be near to the entrances and ideally, should not be combined with the long stay as public access to the long stay would not provide appropriate security. The type of stands to be provided need to be identified and must include 5% accessible stands; plans must show the access routes, door openings and dimensions.

Following the road safety audit which has been undertaken, the revised layout is considered acceptable.

LBH Urban Design Officer

It is welcome to see consideration in massing and outlook for the pending Notting Hill Housing development immediately east of site. This will shape both how the site public realm is used and the built character of the wider backland area. The mix of unit sizes within the residential component is highly welcome and will aid a diverse and heterogeneous social mix within the flatted block. The stepped element to commercial and secondary residential entrances with glass balustrade cannot be supported. These entrances should be at-grade or ramped and well-knitted into the surrounding public realm. The primary residential entrance is well considered with a generous dwelling space upon entrance and unique setts delineating this space as the main entrance.

The curved suspended decking is an unsuccessful element of the scheme and feels detached from the form of the building itself. Its curved form and relationship to the main massing should be revised and reduced. Retention of an inaccessible flat roof to rear of commercial unit is appropriate in mitigating noise and privacy issues for residential units and amenity spaces above. Second floor residential units are well considered internally regarding circulation, outdoor space and dual aspect elements however there is concern as to the predominance of north and north-west aspect windows. Additionally, concern exists regarding the type of obscured glazing treatment to south-facing windows.

The use of a glass balustrade at ground floor level to surround the commercial and secondary residential entrances is inappropriate. The applicant is encouraged to use this sparingly as a motif for the rest of the development elevations as at present there is little visual interest to remaining elevations. Material choices for public realm, entrances and signage are of high quality and successful.

The applicant should ensure that biodiversity net gain is achieved on site through generous planting and opportunities for green/ brown roofs where suitable. The applicant should also at this stage consider a fabric first approach and the energy efficiency of the building envelope itself as well as opportunities to greatly reduce construction embodied carbon.

LBH Landscape Officer

The proposed change to the main service road incorporating the primary pedestrian access, using a shared surface for pedestrians and vehicles make more sense than the previously proposed narrow, overshadowed access between Burnell House and 12 Buckingham Parade. The emphasis would need to be on making people feel safe and welcome in this constricted, back of buildings space by creating a well-designed, high quality space that somehow creatively thinks about and solves the issue of the rear, dead commercial facades and clutter and provides as much soft landscape as possible to visually filter the unattractive, cluttered views and create a visual amenity and sense of arrival. The access road must feel safe, pedestrians must feel they have priority and there should be no or limited conflict with vehicles going in and out, turning, loading and unloading or parking. The revised proposals are welcome and it would be for the detailed design to create a high quality environment. Soft landscape is desirable to soften the development, in the small available spaces and should be proposed where it can realistically survive, thrive and be maintained and contribute greenery to the development. If you are minded to approve the application, hard and soft landscape conditions would be required.

LBH Drainage

We can confirm that the FRA submitted is satisfactory. No objection subject to conditions

Secure By Design Officer

Serious consideration must be given to crime and anti-social behaviour at the proposed development site. I have meet with the architects and they have made several changes to the original plans to support obtaining a Secured By Design accreditation. The car park will need to be secured for the private car parking company to manage.

I am concerned that the upper level car park exit and entrance is shared with either the south residential stairs and lifts or the commercial entrance core. I advise that the door to the south residential core is a fire escape only, and that door is alarmed. Therefore the only exit and entrance is via the commercial entrance. The mixture of both the new developments and the Buckingham House refuge storage is not ideal. However if the council are happy with this it will not affect SBD requirements.

A full list of security requirements and security product standards can be sent to the developers once planning permission has been approved.vl also advise that the privately run car park, would benefit from having to obtain and maintain a Park Mark safer parking scheme award.

If planning is granted I would strongly advise that a Secured By Design accreditation be part of the planning conditions for this development

5.0 POLICIES

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

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

5.2 The Government has issued the National Planning Policy Framework [NPPF 2019] sets out the Government’s planning policies for England and how these should be applied, and is a material consideration in the determination of this application.

5.3 In this instance, the Development Plan comprises The London Plan 2016 [LP] and the Local Development Framework [LDF]. The LDF comprises The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan 2013 [AAP], the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan [SALP] 2013 and Harrow Local Area Map 2013 [LAP].

5.4 While this application has been considered against the adopted London Plan (2016) policies, significant regard has also been given to policies in the Publication London Plan (2020), as this will replace the current London Plan (2016) when published and form part of the development plan for the Borough.

5.5 The Publication London Plan was originally published in draft form in December 2017 and subject to Examination in Public (EiP) with the Panel’s report received in October 2019. The Secretary of State issued two sets of directions on policies in the subsequent London Plan (Intend to Publish Version) (2019). The Mayor of London has accepted the Secretary of State directions and has now sent the Publication London Plan (2020) to the Secretary of State for final approval to publish. As such, the entire Plan can be given significant weight. The Secretary of State has until the 1st February 2021 to either agree the Plan or issue further directives. Should the Publication London Plan (2020) be agreed by the Secretary of State, the Mayor of London will be in a position to publish it, thereby superseding the London Plan (2016) and giving it full weight as part of the Council’s development plan.

5.6 The Publication London Plan (2020) is a material planning consideration that holds significant weight in determining planning applications, with relevant policies referenced within the report below and a summary within Informative 1.

6.0 ASSESSMENT

6.1 The main issues are;

- Principle of the Development
- Housing Density and Unit Mix
- Design, Character and Appearance of the Area
- Residential Amenity and Lifetime Neighbourhoods

- Transport and Parking
- Flood Risk and Drainage
- Biodiversity and Sustainability

6.2 Principle of Development

6.2.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2016): 2.8, 3.8
- The Publication London Plan (2020): GG2, H1
- Harrow Core Strategy (2012): CS1A
- Harrow Development Management Policies (2013): DM40

6.2.2 Harrow's Core Strategy establishes a clear vision for the management of growth in the Borough over the Local Plan period (to 2026) and a framework for development in each district of the Borough. Policy CS1(A) directs growth to the Harrow and Wealdstone Opportunity Area and throughout the rest of the borough, within town centres and strategic, previously-developed sites.

6.2.3 Furthermore, the regional policy context (policy H1 of the draft London Plan) requires boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites with particular focus on sites with existing access levels (PTALs) 3-6 which are located within 800m distance of a station, and redevelopment of car parks and low-density retail parks and supermarkets as a source of capacity.

6.2.4 The application site is within Stanmore Town Centre and is regarded as previously developed land. The proposed mixed use development would therefore accord with the strategic objectives of the development plan and the proposed commercial floorspace would contribute to the functioning and vitality of the Town Centre. Officers therefore consider the principle of development to be acceptable.

6.2.5 The existing commercial and residential occupiers of Buckingham House have existing lease arrangements for the car park spaces. Furthermore, it is noted that the application site also formed the location for the cycle and refuse stores for the previously approved residential uses that are detailed in the planning history. The submitted application details that the proposed quantum of cycle and refuse storage space would be reprovided within the development. Furthermore, while the proposal would see a reduction in existing car parking spaces, the application has demonstrated that the number of spaces required as a result of existing lease arrangements (26 car parking spaces) would be provided. This is considered to be acceptable.

6.2.6 While the proposed development would be sited adjacent to the shared boundary with the allocated Anmer Lodge and Stanmore Site, the massing and layout of the development has been designed in response to the implemented planning permission. The upper floors would be sited away from the boundary and would only feature one habitable room window directly facing that site. Officers are

therefore satisfied that the proposed development would not prejudice future development on that site or frustrate the delivery of adopted plans, in accordance with Policy DM1 of the Harrow Development Management Policies.

6.2.7 For these reasons, the proposal would accord with the relevant policies in this regard.

6.3 Housing Density and Unit Mix

6.3.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2016): 3.3, 3.4 3.8
- The Publication London Plan (2020): GG4, H1, H4, H5, H6, H10
- Harrow Core Strategy (2012): CS11,
- Harrow Development Management Policies (2013): DM24

6.3.2 The London Plan and Local Plan policies on housing development must be viewed in the context of the forecast growth across London and Harrow's spatial strategy for managing growth locally over the plan period to 2026.

6.3.3 The proposed development would contribute to the boroughs housing need over the plan period to 2026 by providing a further 9 residential units. London Plan Policy 3.4 seeks to optimise housing output from development by applying the sustainable residential quality density matrix at Table 3.2 of the Plan. Supporting text to the policy makes it clear that the density matrix is only the start of planning for housing development and that it should not be applied mechanistically. Further guidance on how the matrix should be applied to proposals is set out in the Mayor's Housing SPG (2012).

6.3.4 The application site area is 0.07 hectares and it has a public transport accessibility level (PTAL) score of 3 indicating a moderate level of public transport accessibility. Within the definitions of the London Plan density matrix, the site is considered to have an urban setting. Although the proposed units per hectare and habitable rooms per hectare would fall within the density matrix of the London plan, as noted above, the matrix is only the starting point for considering the density of development proposals.

6.3.5 The second reason for refusal in the preceding application related to the housing mix and inefficient layout which did not optimise the housing potential of the site. In the planning appeal provided in Appendix 5, it is noted that the Planning Inspector found the housing mix to be acceptable for the preceding application. Notwithstanding this, the subject proposal has amended the housing mix to provide a commensurate mix with its Town Centre designation. Officers consider that the revised housing mix would be acceptable. The proposal would therefore accord with the relevant policies in this regard.

6.4 Design, Character and Appearance of the Area

6.4.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2016): 7.4, 7.6, 7.8, 7.12
- The Publication London Plan (2020): D1, D3
- Harrow Core Strategy (2012): CS1,
- Harrow Development Management Policies (2013): DM1, DM3

6.4.2 The layout, massing and scale and design of the proposed development is identical to the preceding application which officers considered to be acceptable. The visual and townscape quality of the existing site is low given its 'backland' siting and function as a car park. The proposed layout of the development and its massing and height would be acceptable with the existing and emerging built context.

6.4.3 In terms of design, the proposal would feature numerous set-backs that would break up the mass to ensure that the development does not appear overly bulky and unremitting. Furthermore, the proposal has been amended to remove the curved suspended decking which would enhance the appearance of the building and emphasise the articulated facades. In terms of architectural appearance the proposed building would be predominantly finished in brick. The car park would be partly obscured by perforated decorated metal screening. Officers consider that the proposed architectural detailing would create visual interest and articulate the façade in a way that sympathetically relates to, and compliments the context of the site.

Locally Protected Views and Vistas

6.4.4 The application site falls within the protected views setting corridor of Wood Farm Country Park. The submitted design and access statement shows a section of the protected view. The proposed building would only be marginally higher than Burnell House and Buckingham House and similar in height to Block A of the adjacent Notting Hill Genesis development. On this basis, officers consider that the proposal would not harm the protected view and their landmark elements. The proposal would therefore accord with the relevant policies in this regard.

Landscaping

6.4.5 The existing site is dominated by hardstanding. As detailed in the residential amenity and lifetime neighbourhoods subsection, the proposed primary access route proposed would be capable of support by officers, subject to further detailed design. The intention of a high-quality hard surface materials to reinforce the pedestrian priority of the access is acknowledged. The proposed soft landscaping would be relatively modest in size, but would nonetheless provide an enhancement to the existing provision.

6.5 Residential Amenity and Lifetime Neighbourhoods

6.5.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2016): 3.5, 7.6,
- The Publication London Plan (2020): D5, D6
- Harrow Core Strategy (2012): CS1
- Harrow Development Management Policies (2013): DM1, DM27
- Mayor's Housing SPG (2016)

Neighbouring Occupiers

6.5.2 In the preceding application, officers considered that the impact of the proposal on the residential amenities of the adjoining occupiers would be acceptable. The layout, massing and fenestration details are broadly similar to the preceding scheme.

6.5.3 Given that the existing site is a car park and owing to the absence of built form, the neighbouring occupiers benefit from a largely open view from the respective south south-east facing elevation of Burnell House and the north-west facing elevation of Buckingham House. Clearly, such a scale of development on a site with little/low-rise existing development will result in a significant change in outlook when viewed from these neighbouring residential flats. However visibility does not equate to harm.

6.5.4 In terms of separation distances, the proposed first-floor would be set-in 3m from the northern boundary, 20m to the south of Burnell House, between 12-19m away from the shared boundary with Buckingham House to the south and between 3-5m with the shared boundary to the east. These distances would also be retained at second floor level, although the proposed northern flank wall would be set in a further 1.5m away from the boundary owing to the provision of the inset terrace. The proposed third floor would feature a further recess to the southern elevation increasing the distance from 14-16m to 18-20m from the southern boundary. This recess would increase again at fourth floor level increasing to 21-23m for the southern flank wall. The proposed fifth floor would be set in further resulting in a separation distance of 5m to the northern boundary, 6m to the eastern boundary and 29m to the southern boundary.

6.5.5 The residential units facing the application site within Burnell House and Buckingham House are single aspect. However, it is important to note that these properties were predominantly converted from offices into residential flats through Class O of the Part 3 Town and Country Planning (General Permitted Development) (England) Order 2015, as amended. Under Class O, there was no consideration on the layout or quality of accommodation of the proposed residential units. Many of the flats therefore do not accord with the design standards set out in the London Plan and the Mayors Housing SPG as they are single aspect units. The siting of single aspect units towards the application site is considered to result in a poor relationship (for which the LPA had no control

over) and may unreasonably prejudice the ability to optimise the potential of the site for development in accordance with the spatial strategy for this town centre location.

- 6.5.6 It is noted that the closest distance between the proposed building and the respective habitable room elevation for Buckingham House would be approximately 12m. The majority of the building would be sited approximately 18m (or more) away from Buckingham House. A distance of 11m would be the minimum provided between the most western part of Building A of the approved Notting Hill development to the east of the application site. However, a separation distance of approximately 20m would be retained between the eastern flank wall of the proposed development and the recessed western flank wall of Building A (which would be the primary elevation for the flats). The proposed northern flank wall would be sited 20m from the south-eastern elevation of Burnell House. As detailed within the subsection on the character of the proposed development, it is considered that the staggered design of the building and articulation of the building would serve to provide some visual relief and would help to mitigate the perception of its bulk and massing. Taken together with the separation distances described above and having regard to the need to make effective and efficient use of this backland town centre site, it is considered that the visual impact of the proposed development would not be unacceptable
- 6.5.7 The private amenity space would be provided in the form of balconies. The proposed terraces in the north and west elevations would mainly be integral to the building. Open terraced balconies would be partly provided for flat numbers 6, 8 and 9. It is noted that a number of concerns have been raised by neighbouring residents in relation to the potential for overlooking and loss of privacy. It is noted that the balconies on the northern and western elevations would primarily be inset balconies. A minimum separation distance of 23m would be provided between the balconies on the northern elevation and Burnell House, and a distance of 21m-25m would be maintained between the western facing balconies and Buckingham House. The south facing terrace to Flat 8 would be sited approximately 12m away from the deepest part of Buckingham House East. Given the separation distances afforded, the orientation of the windows and balconies and within the context of a town centre location such as this, officers consider that the proposal would not have an unacceptable privacy relationship with the adjoining properties

Daylight and Sunlight

- 6.5.8 A number of consultation responses received by the occupiers of Buckingham House and Burnell House specifically raise concern at the potential loss of daylight and sunlight. The proposed development would be sited to the south-east of Burnell House, north/east of Buckingham House and to the west of Block A of the approved Notting Hill Genesis scheme.
- 6.5.9 A daylight and sunlight report has been included as part of the submission documents. The assessment uses a widely recognised methodology to assess the proposal's impact upon neighbouring property against British Research

Establishment (BRE) guidelines which is considered to be more appropriate for the assessment of the proposal's amenity impacts, pursuant to Policy DM1 of the Harrow Development Management Policies. The report assesses the potential impact on 80 windows within Buckingham House, 45 windows within Block A of the approved Notting Hill Genesis Scheme and 55 windows on Burnell House.

- 6.5.10 In relation to daylight impacts, the report concludes that all 180 windows achieve the recommended daylight targets and all 101 windows identified as facing within 90 degrees due south of the development would achieve the recommended sunlight targets. Having considered the conclusions of the submitted report, officers are satisfied that the proposal would not have a detrimental impact on the daylight or sunlight of adjoining occupiers.

Noise and Disturbances

- 6.5.11 The subject site has been in use as a car park. The adjoining residential properties within Buckingham House and Burnell House are comparatively new (having been converted post 2015). The proposed development would reduce the number of parking spaces within the site and the car park itself would be rationalised occupying a smaller area and screened by perforated decorative metal. It is therefore considered that the noise associated with the comings and goings of motor vehicles would be reduced. The noise and disturbances that may be experienced as a result of the residential/commercial use and the proposed comings and goings from the site would be similar to that experienced within the site and would be expected within a town centre location such as this. On this basis, officers are satisfied that the proposed development would not have an unduly harmful impact on the residential amenities of the adjoining occupiers in this regard

Residential Quality of Proposed Development

- 6.4.12 The proposed flats would adhere to or exceed the minimum space standards. All the flats would be dual aspect and therefore benefit from acceptable levels of light and outlook and would feature the minimum quantum of private amenity space. Officers consider that the proposed flats would provide a high quality of accommodation for the future occupiers and would accord with the relevant policies in this regard.

Lifetime Neighbourhoods and Secure by Design

- 6.4.13 In the preceding application, the primary pedestrian route to the application site (between Buckingham House and Burnell House) was considered to be unacceptable and constituted a reason for refusal. This reason for refusal was upheld by the Planning Inspector and the appeal was subsequently dismissed on this basis. The subject application has sought to address this by utilising the existing service road to the south of the existing car park as the primary pedestrian route. It is acknowledged that the existing service road is used by vehicles to service the adjacent commercial units and that cars are found to be parked on the side of that service road. However, the red line of the application

site captures the service road and therefore, the proposed amendments and implementation of any proposed landscaping measures would be in the control of the applicant.

- 6.4.14 The applicant has undertaken a road safety audit and detailed design assessment to ensure the proposed access road would have a pedestrian priority. Key behavioural principles include the paving type to be used, high quality external lighting and a speed reduction along the road, to ensure that it works as a genuine shared surface with pedestrian priority. A new residential entrance is also proposed to the south-east corner of the building adjacent to the shared boundary with the Notting Hill Scheme. This would ensure that the proposed residents would have to travel the minimum distance along the shared surface (from the link road to The Broadway) in order to access the entrance. This is a positive amendment. The Council's Highways Officer has reviewed the proposal and is satisfied with the findings and suggested layout following the road safety audit. Furthermore, the Council's Urban Design Officer and Landscape Officer consider this to be a more suitable approach than that proposed for the preceding scheme. Subject to appropriate conditions, the proposal would accord with the relevant policies in this regard.
- 6.4.15 The application was referred to the Metropolitan Police Secure by Design Officer who provided some suggestions relating to the layout and access of the car park and bin/cycle stores. These have subsequently been amended in line with the comments during the course of the application. A condition is included to ensure that the development would achieve Secure by Design Accreditation. Subject to this, the proposal would be acceptable in this regard.

6.5 Traffic and Parking

- 6.5.1 The relevant policies are:
- National Planning Policy Framework (2019)
 - The London Plan (2016): 6.3, 6.9, 6.13
 - The Publication London Plan (2020): T4, T5, T6, T6.1
 - Harrow Core Strategy (2012): CS1
 - Harrow Development Management Policies (2013): DM42, DM44, DM45
- 6.5.2 The application site is has a PTAL rating of 3. The surrounding roads are subject to a Controlled Parking zone which restricts on-street parking in the dedicated bays to permit holders or are pay and display bays relating to the Town Centre. The service road within the application site service the commercial units within Buckingham House. It was observed during the officer site visit that the service road was in active use.
- 6.5.3 The application was referred to the Council's Highways officer who has advised that the level of provision (and reprovision) of parking and cycle spaces would be acceptable. Subject to conditions securing a car park design and management plan, details of cycle storage, a delivery and servicing plan and a construction logistics plan, the Council's Highways Officer has raised no objection to the proposal. On this basis, officers are satisfied that the proposal would not have a

detrimental impact on the safety or functioning of the highway or pedestrian safety.

6.6 Flood Risk and Drainage

6.6.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2016): 5.12, 5.13, 5.14
- The Publication London Plan (2020): SI12, SI13
- Harrow Core Strategy (2012): CS1
- Harrow Development Management Policies (2013): DM9, DM10

6.6.2 A Flood Risk Assessment has been submitted with the application. The Council's Drainage Engineer has reviewed the proposal and raised no objection to the proposal, subject to appropriate conditions and Land Drainage Consent to undertake any works within 5m of the watercourse. The proposal would therefore comply with the relevant policies in this regard.

6.7 Biodiversity and Sustainability

6.7.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2016): 7.19, 7.21
- The Publication London Plan (2020): G6
- Harrow Core Strategy (2012): CS1
- Harrow Development Management Policies (2013): DM20, DM21, DM22

6.7.2 The site represents a place where biodiversity could be enhanced and further details are required with regards to the green roof, planting, bird/bat boxes to ensure the biodiversity gain will be delivered in accordance with the above policies. Officers are satisfied that this can be addressed through appropriate conditions.

6.7.3 The application is accompanied by an Energy Strategy which detailed the proposal would incorporate high performance building fabric and energy efficient lighting, services and controls to reduce energy demand for space heating, cooling, ventilation and lighting. Passive measures will also reduce energy demand and Air Source Heat Pumps would be used for space and hot water heating. On this basis, it is considered that the proposed energy strategy would be consistent with the relevant policies and would be acceptable in this regard.

7.0 CONCLUSION AND REASONS FOR APPROVAL

- 7.1 The proposal would respond to the strategic objective of optimising the potential for growth on sustainable brownfield sites within Town Centre locations. The proposed development would appropriately relate to the site, local context, massing and architectural appearance and would bring forward housing provision of a satisfactory layout and design to ensure that the future occupiers would benefit from an acceptable standard of living accommodation.
- 7.2 Given the Town Centre location of the application site, officers are satisfied that the proposal would maintain an appropriate quality of residential amenity for the adjoining occupiers. The proposal would enhance biodiversity on the site, provide sustainable urban drainage measures, improve access routes and provide high-quality hard and soft landscaping. Furthermore, the transport aspects of this proposal are considered to be in accordance with strategic and local transport policies.
- 7.3 For all the reasons considered above, and weighing up the development plan policies and proposals, and other material considerations including comments received in response to notification and consultation as set out above, this application is recommended for grant.

APPENDIX 1: Conditions and Informatives

Conditions

1. Timing

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

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

2. Approved Plans and documents

Save where varied by the other planning conditions comprising this planning permission, the development hereby permitted shall be carried out, completed and retained in accordance with the following approved plans and documents:

DC-052-PL-0001, DC-052-PL-0002, DC-052-PL-0003, DC-052-PL-0200, DC-052-PL-0201, DC-052-PL-0202, DC-052-PL-0203, DC-052-PL-0100, DC-052-PL-1100 Rev C, DC-052-PL-1101 Rev B, DC-052-PL-1102 Rev B, DC-052-PL-1103 Rev A, DC-052-PL-1104 Rev A, JM-052-PL-1105 Rev A, DC-052-PL-1106 Rev A, DC-052-PL-1107 Rev A, DC-052-PL-1108 Rev C, DC-052-PL-1110 Rev A, DC-052-PL-1112, DC-052-PL-1113 Rev C, DC-052-PL-1201 Rev A, DC-052-PL-1202 Rev A, DC-052-PL-1203 Rev A, DC-052-PL-1201 Rev A, DC-052-PL-1311 Rev A, DC-052-PL-1312 Rev A, Odour Appraisal (16 December 2019), Phase 1 Land Quality Assessment (March 2019), Residential Travel Plan Statement (August 2020), Transport Statement August (2020), Daylight, Sunlight and Overshadowing Assessment (August 2020), Flood Risk Assessment and SuDS Strategy (August 2020), Acoustic Design Impact (13 August 2020), Planning Statement (August 2020), Design & Access Statement (version 01), Energy Statement (December 2019), Sustainability Statement (December 2019), Construction Logistics Statement (27/08/2020), Transport Note (22nd October 2020)

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

3. Construction Logistics Plan

No development shall take place until a demolition and construction logistics plan has first been submitted to the Local Planning Authority in writing to be agreed. The plan shall detail the arrangements for (but not limited to):

- the parking of vehicles of site operatives and visitors;
- loading and unloading of plant and materials;
- storage of plant and materials used in construction the development;
- the erection and maintenance of security hoardings including decorative displays and facilities for public viewing;
- wheel washing facilities; and
- a scheme for recycling/disposing of waste resulting from demolition and construction works.

- measures for the control and reduction of dust
- measures for the control and reduction of noise and vibration.

The demolition and construction of the development shall be carried out in accordance with the plan so agreed.

REASON: To ensure that the transport network impact of construction work associated with the development is managed, measures are put in place to manage and reduce noise and vibration impacts during construction and to safeguard the amenity of neighbouring occupiers. Details are required prior to commencement of development to ensure a satisfactory form of development.

4. Site Levels

No site works or development shall commence until details of the levels of the building(s), road(s) and footpath(s) in relation to the adjoining land and highway(s), and any other changes proposed in the level of the site, has first been submitted to the Local Planning Authority in writing to be agreed. The development shall be carried out in accordance with the details so agreed.

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

5. Surface Water Attenuation and Disposal

No development shall take place until surface water attenuation and storage works and the disposal of surface water have been submitted to, and approved in writing by, the local planning authority. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter. The applicant should contact the Harrow Infrastructure Team at the earliest opportunity.

REASON: To ensure that the development achieves an appropriate greenfield run-off rate in this critical drainage area and to ensure that sustainable urban drainage measures are exploited. Details are required prior to commencement of development to ensure a satisfactory form of development.

6. Foul Water Disposal

The development hereby permitted shall not commence until works for the disposal of sewage have been submitted to, and approved in writing by, the local planning authority. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter. The applicant should contact Thames Water Utilities Limited and the Harrow Infrastructure Team at the earliest opportunity.

REASON: To ensure that adequate drainage facilities are provided. Details are required prior to commencement of development to ensure a satisfactory form of development.

7. Drainage Maintenance and Permeable Paving

No development shall take place until full details of permeable paving and details relating to the long-term maintenance and management of the on-site drainage has first been submitted to the Local Planning Authority in writing to be agreed. The development shall be carried out and thereafter be managed and maintained in accordance with the plans so agreed.

REASON: To ensure that the development achieves an appropriate surface water run-off rate in this critical drainage area and to ensure that opportunities drainage measures that contribute to biodiversity and the efficient use of mains water are exploited. Details are required prior to commencement of development to ensure a satisfactory form of development.

8. Car Park Design and Management Plan

The Development hereby permitted shall not commence until a detailed Car Park Design and Management Plan has been submitted and approved in writing by the Local Planning Authority. This shall also include parking enforcement measures that will be applied to ensure that no parking will take place on the shared surfaced road proposed, The development shall be carried out and thereafter be managed and maintained in accordance with the plans so agreed for the lifetime of the development.

REASON: To ensure that the proposed design and management for the car park accords with the requirements of highway safety and sustainable transport. Details are required prior to commencement of development to ensure a satisfactory form of development.

9. Landscaping

Notwithstanding the details shown on the approved plans, the development hereby approved shall not commence until a scheme for the hard and soft landscaping of the development, to include details of the planting and hard surfacing material within the site boundary including the access routes proposed within the application site, has been submitted to, and agreed in writing by, the local planning authority. Soft landscaping works shall include: planting plans (at a scale not less than 1:100), written specification of planting and cultivation works to be undertaken and schedules of plants, noting species, plant sizes and proposed numbers / densities and an implementation programme. The scheme shall also include details of the boundary treatment. The development shall be carried out in accordance with the approved scheme or any amendment or variation to it as may be agreed in writing by the local planning authority, and maintained in accordance with the approved scheme.

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes to the creation of a high quality, accessible, safe and attractive public realm and to ensure a high standard of design, layout and amenity. Details are required prior to commencement of development to ensure a satisfactory form of development.

10. Materials

Notwithstanding the details shown on the approved drawings, the development hereby approved shall not progress above damp proof course level until:

- details and samples of the materials to be used in the external surfaces of the buildings (facing materials for the buildings, windows/ doors/ curtain walling, balconies including privacy screens and balustrades, entrance canopies), hard surfaces, and any means of enclosure;
- drawings to a 1:20 metric scale to show typical details of the elevations from all sides and the slab thickness of roof parapets;
- boundary treatment
- has first been submitted to the Local Planning Authority in writing to be agreed. The development shall be carried out in accordance with the details, samples and drawings so agreed and shall be retained as such thereafter.

REASON: To ensure that the development provides a high-quality finish and enhances the character and appearance of the area.

11. Lighting Strategy

The development hereby approved shall not progress above damp proof course level until details of the lighting of all public realm and other external areas (including buildings) within the site has first been submitted to the Local Planning Authority in writing to be agreed. The details shall include details of the intensity of light emissions (including the surface area to be illuminated), detailed drawings of the proposed lighting columns and fittings and any measures for mitigating the effects of light pollution. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development incorporates lighting that contributes to Secured by Design principles, achieves a high standard of residential quality

12. Biodiversity Enhancement

The development hereby permitted shall not commence above damp proof course level until full details of biological enhancements for the site have been submitted to, and agreed in writing by, the local planning authority. The enhancements shall include;

- the type and location of bat and bird boxes to be built into the structure
- full details of the proposed green roof treatment, including roof build up, plant species mix(es) which should include twenty plus native flower species offering pollen and nectar from early spring to late autumn, together with an

assessment of the sustainability of the roof to ensure adequate water provision/retention

- Full details of measures to be taken to provide shelter and foraging for invertebrate species at ground level, in the external building walls, and within the green walls and green roof areas.

REASON: To enhance the ecology and biodiversity of the area

13. Landscape management and maintenance

The development hereby approved shall not be occupied until a scheme for the on-going management and maintenance of the soft and hard landscaping within the development, to include a landscape management plan, including long term design objectives, management responsibilities and maintenance schedules for a minimum period of 5 years for all landscape areas, and details of irrigation arrangements and planters, has first been submitted to the Local Planning Authority in writing to be agreed. The development shall be carried out in accordance with the scheme so agreed and shall be retained as such thereafter.

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes (i) to the creation of a high quality, accessible, safe and attractive public realm and (ii) to the enhancement, creation and management of biodiversity with the Heart of Harrow

14. Landscape implementation

All hard landscaping shall be carried out prior to the occupation of any part of the development or in accordance with a programme that has been submitted to the Local Planning Authority in writing to be agreed. All soft landscaping works including planting, seeding or turfing comprised in the approved scheme of landscaping shall be carried out no later than the first planting and seeding season following the final occupation of the residential parts of the buildings, or the completion of the development, whichever is the sooner. Any existing or new trees or shrubs which, within a period of 5 years from the completion of the development, die, are removed, or become seriously damaged, diseased or defective, shall be replaced in the next planting season, with others of a similar size and species, unless the local authority agrees any variation in writing.

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes (i) to the creation of a high quality, accessible, safe and attractive public realm and (ii) to the enhancement, creation and management of biodiversity

15. Delivery and Servicing Plan

No part of the development shall be first occupied until a Delivery and Servicing Plan, covering both the residential and non-residential elements of the development has first been submitted to the Local Planning Authority in writing to be agreed. The revised Delivery and Servicing Plan shall include full details of

the onsite Refuse Management Strategy. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter. All deliveries and servicing associated with the development shall be carried out only in accordance with the approved details.

REASON: To ensure that the transport network impact of deliveries associated with non-residential uses within the development are managed; the development achieves a high standard of residential quality for future occupiers of the development and provides a high quality, safe and attractive public realm

16. Secure by Design

Prior to the first occupation of the development, evidence of Secured by Design Certification shall be submitted to the Local Planning Authority to be agreed in writing, or justification shall be submitted where the accreditation requirements cannot be met. Secure by design measures shall be implemented and the development shall be retained in accordance with the approved details.

REASON: In the interests of creating safer and more sustainable communities and to safeguard amenity by reducing the risk of crime and the fear of crime

17. Cycle Provision

The development hereby permitted shall not be occupied until details of cycle parking, including full specification of the type of stand and dimensions of storage unit have been submitted to, and agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure appropriate cycle provision.

18. Refuse storage

The refuse bins shall be stored at all times, other than on collection days, in the designated refuse storage area, as shown on the approved drawing plans.

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

19. Contamination

If, during development, contamination not previously identified is found to be present at the site then no further construction of the development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unanticipated contamination is to be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

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

20. Noise Levels

Unless otherwise agreed in writing by the Local Planning Authority, the individual and cumulative rating level of noise emitted from plant and/or machinery at the development hereby approved shall be at least 10dB below the existing background noise level. The noise levels shall be determined at the nearest residential property. The measurements and assessment shall be made in accordance with British Standard 4142 Method for rating industrial noise affecting mixed residential and industrial areas.

REASON: To ensure that the development achieves a high standard of amenity for future occupiers of this and the neighbouring buildings

21. Air Extraction system

No air extraction system shall be used on the premises until a scheme for the control of noise, fumes and odours emanating from the site has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall then be fully implemented before the development is occupied/the use commences and thereafter shall be retained and maintained in good working order for so long as the building remains in use.

REASON: To ensure that the development achieves a high standard of amenity for future occupiers of this and the neighbouring buildings

22. Class E Use Restriction

The premises shall be only be used for offices as detailed for the purposes specified in the application and for no other purpose, including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (or in any provision equivalent to that Class in any Statutory Instrument revoking and re-enacting that order with or without modification).

REASON: To safeguard the amenity of neighbouring residents and the character of the locality and in the interests of highway safety

23. Non-residential opening hours

The non-residential use hereby approved shall only be open between: 08:00am and 20:00pm on Mondays to Saturdays unless otherwise agreed in writing by the local planning authority.

REASON: To ensure that the operation of the ground floor use is compatible with residential amenity

24. Non-residential Delivery Hours

Deliveries to the non-residential use within the development shall take place only between the hours of 08:00 and 18:00 on Mondays to Fridays and between the hours of 08:30 and 13:00 on Saturdays. There shall be no non-residential loading or unloading on Sundays, Public or Bank Holidays.

REASON: To ensure that the noise impact of deliveries associated with non-residential uses within the development is minimised and that the development achieves a high standard of amenity for future and the neighbouring occupiers

25. Accessible Units

The development hereby permitted shall be constructed to the specifications of: "Part M, M4(2), Category 2: Accessible and Adaptable Dwellings" of the Building Regulations 2013 and thereafter retained in that form.

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

Informatives

1. Planning Policies

The following policies are relevant to this decision:

The London Plan (2016): 3.1, 3.3, 3.5, 3.8, 4.2, 5.2, 5.3, 5.12, 5.13, 5.18, 6.3, 6.9, 6.10, 6.13, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6

The Publication London Plan (2020): GG1, GG2, GG3, SD6, D1, D2, D3, D4, D5, D6, D7, H10, E1, HC3, G6, SI13, T3, T4, T5, T6, T6.1, T6.2

Harrow Core Strategy (2012): CS1

Development Management Policies DPD (2012): DM1, DM2, DM9, DM10, DM12, DM24, DM27, DM32, DM40, DM42, DM44, DM45

Supplementary Planning Document: Residential Design Guide (2010)

Mayor of Londons Housing Supplementary Planning Guidance (2016)

2. Considerate Contractor Code of Practice

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

3. The Party Wall etc. Act 1996

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

1. work on an existing wall shared with another property;
2. building on the boundary with a neighbouring property;
3. excavating near a neighbouring building,

and that work falls within the scope of the Act. Procedures under this Act are quite separate from the need for planning permission or building regulations approval. "The Party Wall etc. Act 1996: Explanatory booklet" is available free of charge from: Communities and Local Government Publications, PO Box 236 Wetherby, LS23 7NB. Please quote Product code: 02 BR 00862 when ordering.

Also available for download from the CLG website: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/133214.pdf>

Tel: 0870 1226 236, Fax: 0870 1226 237, Textphone: 0870 1207 405, E-mail: Ucommunities@twoten.comU4T

4. Mayoral Community Infrastructure Levy (provisional)

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

The Provisional Mayoral CIL liability for the application, based on the Mayoral CIL levy rate for Harrow of £60/sqm is £61,620. This amount includes indexation which is 323/323. The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).

You are advised to visit the planningportal website where you can download the appropriate document templates. Please complete and return the Assumption of Liability Form 1 and CIL Additional Information Form 0.
https://ecab.planningportal.co.uk/uploads/1app/forms/form_1_assumption_of_liability.pdf https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf

If you have a Commencement Date please also complete CIL Form 6:
https://ecab.planningportal.co.uk/uploads/1app/forms/form_6_commencement_notice.pdf

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

5. Harrow Community Infrastructure Levy (provisional)

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

Harrow's Charges are:

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

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

Retail (Use Class A1), Financial & Professional Services (Use Class A2), Restaurants and Cafes (Use Class A3) Drinking Establishments (Use Class A4)

Hot Food Takeaways (Use Class A5) - £100 per sqm

All other uses - Nil.

The Provisional Harrow CIL liability for the application, based on the Harrow CIL levy rate for Harrow of £110/sqm is £124,677

This amount includes indexation which is 323/224. The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).

The CIL Liability is payable upon the commencement of development.

You are advised to visit the planningportal website where you can download the relevant CIL Forms.

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

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

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

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

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

The above forms should be emailed to HarrowCIL@Harrow.gov.uk

Please note that the above forms must be completed and provided to the Council prior to the commencement of the development; failure to do this may result in surcharges

6 Pre-application engagement

Statement under Article 35(2) of The Town and Country Planning (Development Management Procedure) (England) Order 2015. This decision has been reached in accordance with paragraphs 187-189 of The National Planning Policy Framework. Harrow Council has a pre-application advice service and actively encourages applicants to use this service. Please note this for future reference prior to submitting any future planning applications.

7. Thames Water

The applicant is advised to contact Thames Water regarding confirmation of capacity within their system to receive the proposed discharge from the new development

8. Sustainable Urban Drainage

The applicant is advised that surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SUDS). SUDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SUDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SUDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity. Where the intention is to use soak ways they should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365. Support for the SUDS approach to managing surface water run-off is set out in the National Planning Policy Framework (NPPF) and its accompanying technical guidance, as well as the London Plan. Specifically, the NPPF (2012) gives priority to the use of sustainable drainage systems in the management of residual flood risk and the technical guidance confirms that the use of such systems is a policy aim in all flood zones. Policy 5.13 of the London Plan (2012) requires development to utilise sustainable drainage systems unless there are practical reasons for not doing so. Sustainable drainage systems cover the whole range of sustainable approaches to surface drainage management. They are designed to control surface water run-off close to where it falls and mimic natural drainage as closely as possible. Therefore, almost any development should be able to include a sustainable drainage scheme based on these principles. The applicant can contact Harrow Drainage Section for further information

9. Compliance with conditions

Compliance with Planning Conditions Requiring Submission and Approval of Details Before Development Commences

- You will be in breach of planning permission if you start development without complying with a condition requiring you to do something before you start. For example, that a scheme or details of the development must first be approved by the Local Planning Authority.
- Carrying out works in breach of such a condition will not satisfy the requirement to commence the development within the time permitted.
- Beginning development in breach of a planning condition will invalidate your planning permission.
- If you require confirmation as to whether the works you have carried out are acceptable, then you should apply to the Local Planning Authority for a certificate of lawfulness.

10. Highways Interference

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

11. Naming and Numbering

Harrow Council is responsible for the naming and numbering of new or existing streets and buildings within the borough boundaries. The council carries out these functions under the London Government Act 1963 and the London Building Acts (Amendment) Act 1939. All new developments, sub division of existing properties or changes to street names or numbers will require an application for official Street Naming and Numbering (SNN). If you do not have your development officially named/numbered, then then it will not be officially registered and new owners etc. will have difficulty registering with utility companies etc. You can apply for SNN by contacting technicalservices@harrow.gov.uk or on the following link. http://www.harrow.gov.uk/info/100011/transport_and_streets/1579/street_naming_and_numbering

CHECKED

Head of Development Management	Orla Murphy pp Beverley Kuchar 7.1.2021
Corporate Director	Paul Walker 7.1.2021

APPENDIX 2: SITE PLAN

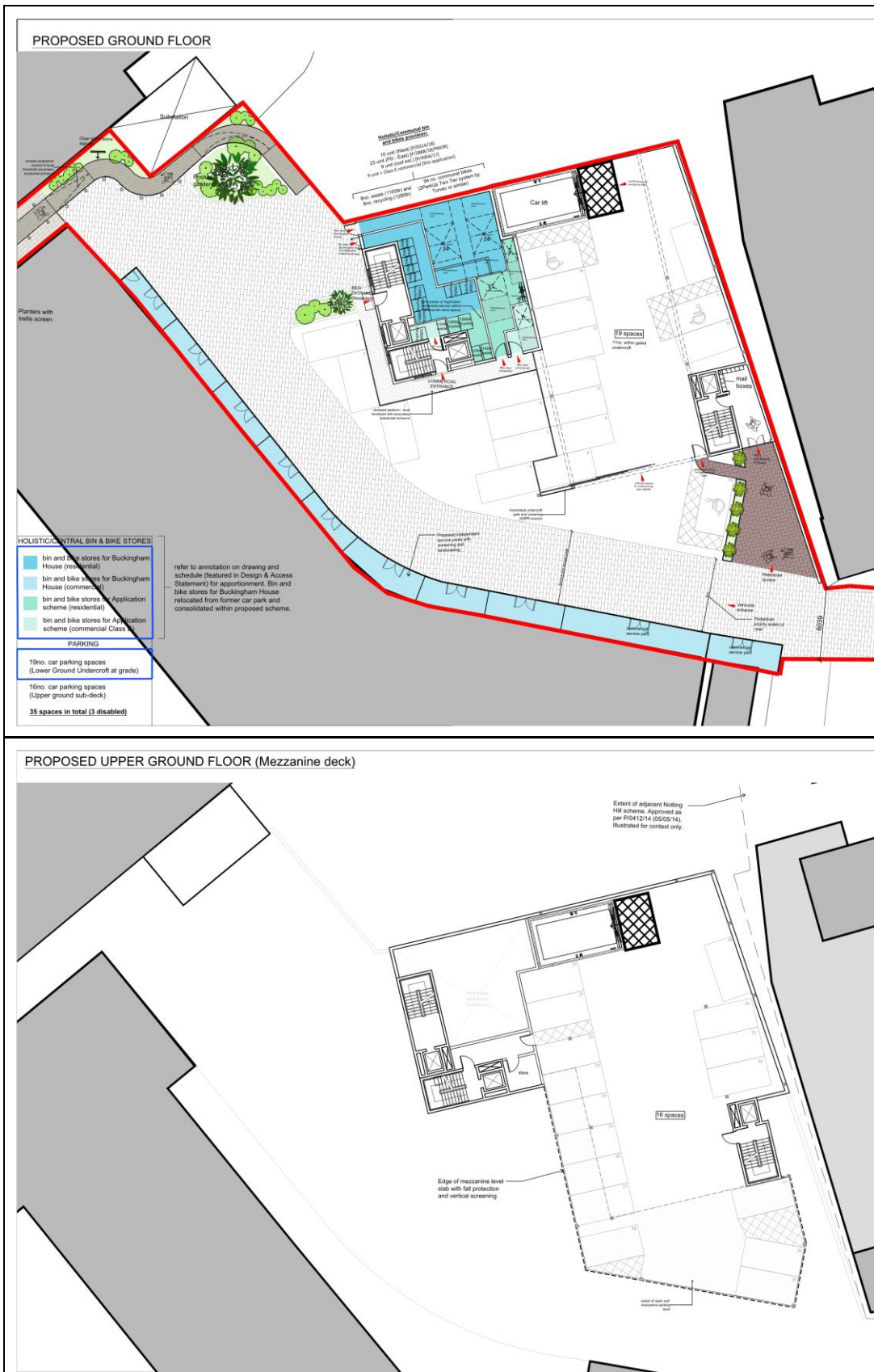


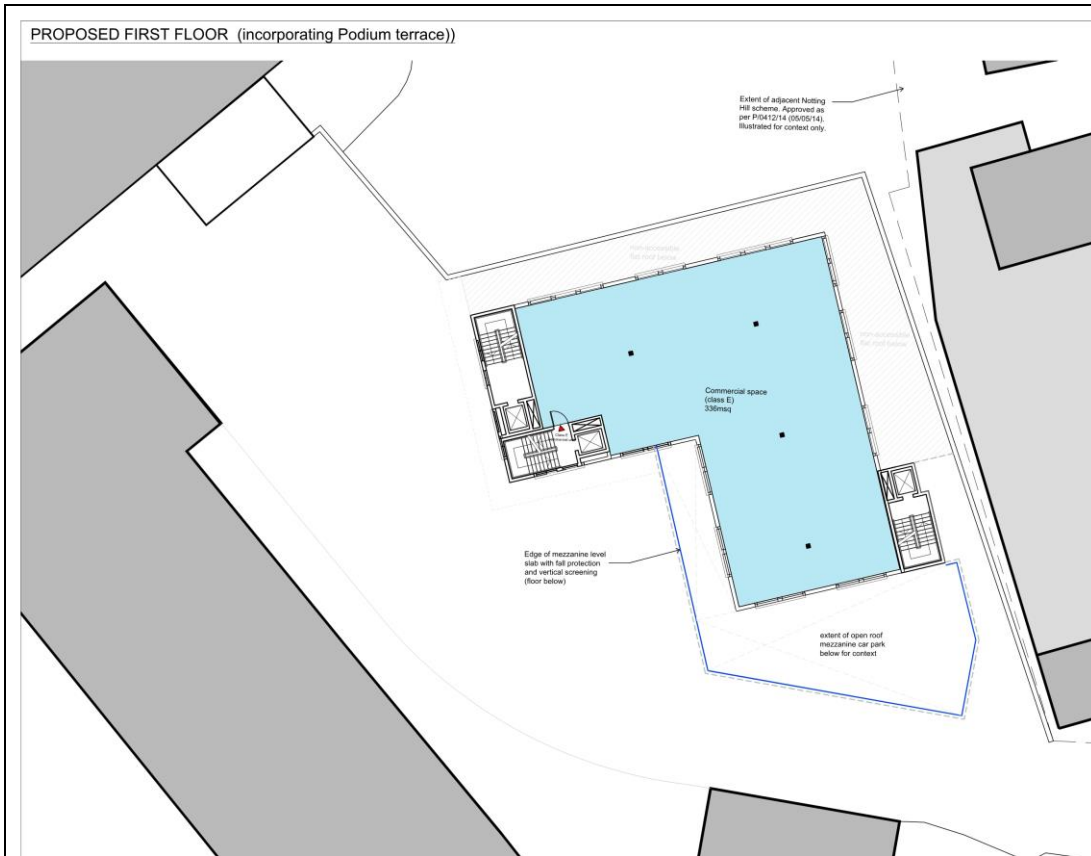
APPENDIX 3: SITE PHOTOGRAPHS

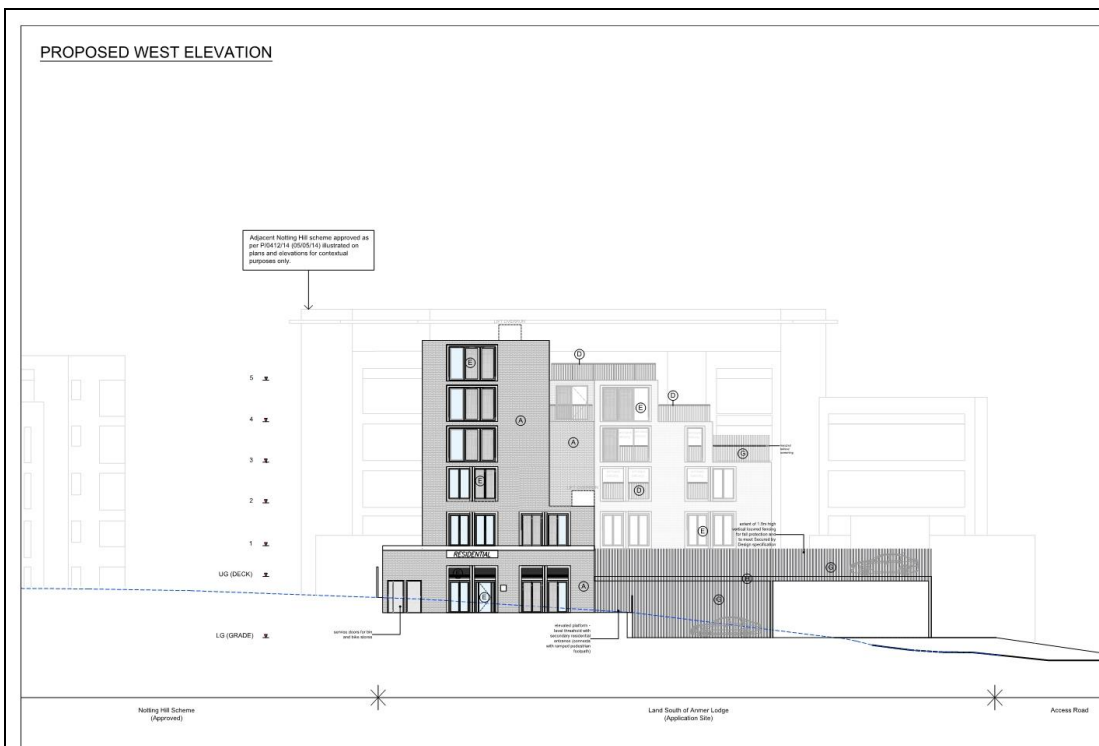
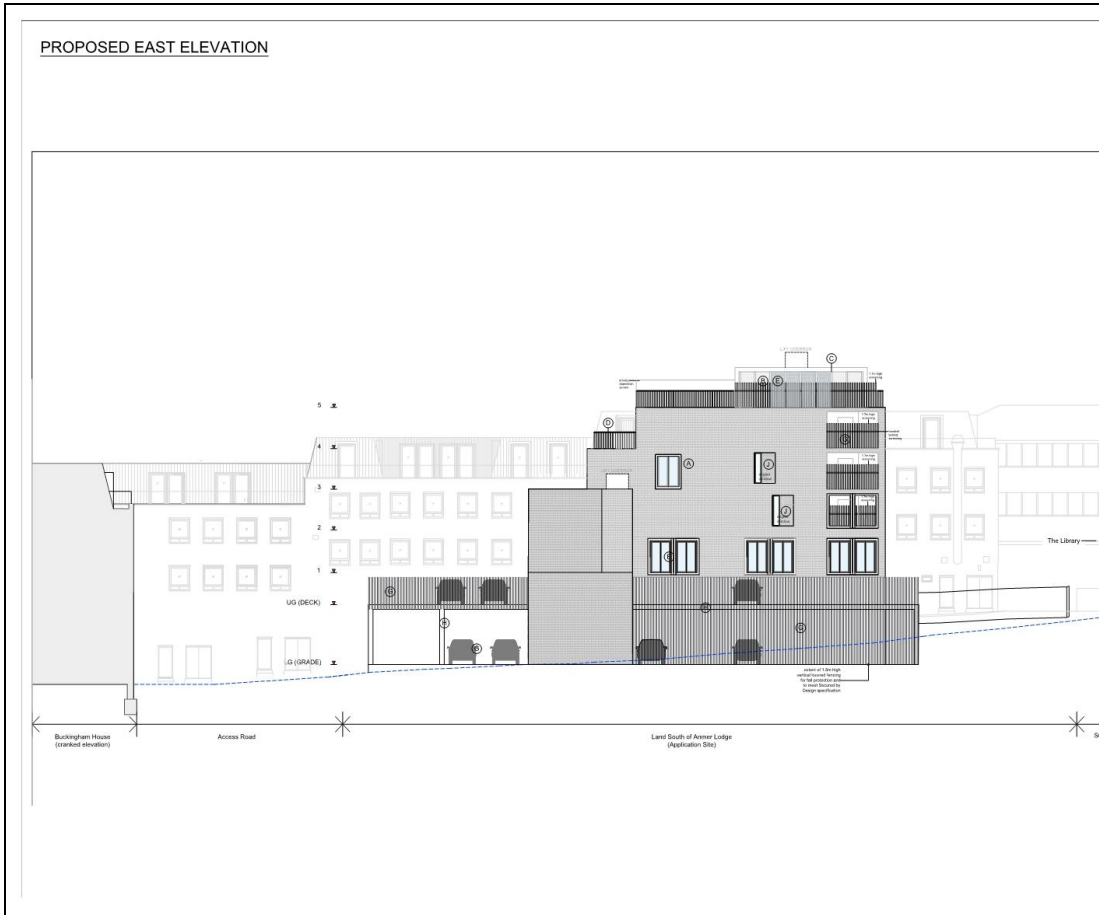




APPENDIX 4: PLANS AND ELEVATIONS







APPENDIX 4: Appeal Decision for application P/5253/19



Appeal Decision

Site visit made on 5 November 2020

by **Martin Chandler BSc MA MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 2 December 2020

Appeal Ref: APP/M5450/W/20/3252162
Land South of Anmer Lodge, Stanmore HA7 4EB

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Design Collect Ltd against the decision of the Council of the London Borough of Harrow.
 - The application Ref P/5253/19, dated 17 December 2019, was refused by notice dated 25 February 2020.
 - The proposal is the development of a five-storey building to provide 302sqm commercial office space (Use Class B1a), nine residential dwellings (Use Class C3), undercroft parking, refuse and cycling storage and landscaping.
-

Decision

1. The appeal is dismissed.

Application for costs

2. An application for costs was made by Design Collect Ltd against the Council of the London Borough of Harrow. This is the subject of a separate decision.

Main Issues

3. The main issues are whether the proposal would:
 - i) provide suitable living conditions for future occupants, having particular regard to the proposed pedestrian access; and
 - ii) make efficient use of the site, having regard to the housing mix and the requirements of local policy.

Reasons

Living conditions

4. The appeal proposal would redevelop an existing car park to the rear of a parade of commercial units. The site forms part of a broader area in use as a car park, much of which already benefits from planning permission for redevelopment. Access to the proposal would be provided in two ways. Vehicular access would be provided from the existing access road to the car park and to the rear of the commercial properties. However, the principal pedestrian access would be provided via an existing footpath that provides access to Buckingham Parade and the commercial units associated with it.

<https://www.gov.uk/planning-inspectorate>

5. The footpath is bounded by the flank elevations of No 12 Buckingham Parade and Burnell House. These are tall and imposing buildings and as a consequence, the gap between them is proportionately small. Due to their height, depth, and the narrow gap between them, the buildings dominate the footpath, creating an imposing sense of enclosure. In addition, the adjacent buildings do not provide windows at ground floor level. Instead, Burnell House has a tall ground floor eaves height with no visual relief and No 12 Buckingham Parade has windows at first floor level. Accordingly, the footpath benefits from very limited natural surveillance. Due to the sense of enclosure and the lack of natural surveillance, the footpath is not a welcoming space and, in this regard, I note the comments from the Metropolitan Police in relation to violent crime and anti-social behaviour in the area.
6. The proposal would seek to make improvements to the footpath and has undergone an iterative approach in this regard. This would include improved landscaping, and the use of lighting, signage, and CCTV. Such interventions would soften the environment. However, they would not alter the dominant sense of enclosure provided by the two adjacent buildings. In addition, in the absence of the proposed development overlooking the footpath, they would not improve the natural surveillance of the space.
7. I note that the footpath already provides access for refuse and cycle storage areas for adjacent residents and that it also already provides access to the car park beyond. However, simply because the route is already used does not make it conducive to increasing its intensity. Even in an enhanced form, the footpath would be a narrow space between two imposing buildings with very little natural surveillance. As a consequence, the opportunities that it could provide for anti-social behaviour and other crime would not be satisfactorily reduced and the nature of the space would remain unwelcoming and uninviting for pedestrians. Accordingly, increasing the likely footfall would not be conducive to creating a safe and secure environment for future residents. This is a matter of fundamental concern to which I attach significant weight.
8. My attention has been drawn to perceived similarities with other development proposals in close proximity to the appeal site. However, it is apparent that the pedestrian access point is materially different to the Notting Hill scheme. That entrance is wider and is flanked by lower buildings and therefore the environment it would create would be demonstrably different. I do not have the full details of the Stanmore House access before me. Therefore, although I note the narrow pedestrian footpath, I am unable to give weight to any similarities. Finally, the London Borough of Redbridge Supplementary Planning Document is noted but this relates to a different borough and accordingly, I do not find it relevant to the appeal before me.
9. I also note that the proposal would provide an alternative pedestrian access. However, this would relate poorly with the existing vehicular access and service road, leaving pedestrians vulnerable and exposed to vehicular movements and the consequent safety concerns. Accordingly, it does not satisfactorily compensate for the shortcomings that I have identified above.
10. The appeal site is undoubtedly previously developed land that is located in a highly sustainable location and I note that the Council have raised no additional objections to the built form and site layout. I also have no reason to believe that the proposal would not generally relate well with the adjacent consent. All

of these matters weigh in favour of the proposal, indeed, as required by the National Planning Policy Framework (the Framework), I attach substantial weight to the value of using such land. However, for the reasons identified above, the proposal would fail to provide a safe, secure and appropriate accessible environment for future residents, which in my view, would give rise to significant and demonstrable safety concerns. This is a matter to which I attach a significant level of weight, and which outweighs the value of using previously developed land.

11. Accordingly, I conclude that the proposal would fail to provide suitable living conditions for future occupants. It would therefore fail to comply with Policies 3.5, 7.1, 7.3, 7.4 and 7.6 of the London Plan (2016), Policy CS1 of the Harrow Core Strategy (2012) (CS), Policies DM1, DM2, and DM22 of the Harrow Development Management Policies Local Plan (2013) (DMP), and guidance contained within the Residential Design Guide (2012) Supplementary Planning Document, and the Mayor's Housing Supplementary Planning Guidance (2016)(SPG). Taken together, these seek amongst other things, high quality development that creates safe, secure and appropriately accessible environments.

Housing mix

12. The appeal proposal would provide nine apartments and as a consequence, it would not trigger the requirements of Policy CS1 of the CS, which relates to proposals of 10 or more houses. Despite this, the Council raise concerns that due to the mix of the proposed apartments, as well as their proposed floor areas, the proposal could be reconfigured to provide more apartments and therefore, a commensurate level of affordable housing provision.
13. The mix of the proposed accommodation would provide 5 x 2 bed apartments, 3 x 3 bed apartments, and 1 x 1 bed apartment. In addition, many of the proposed apartments would exceed the minimum space standards required by local policy.
14. As identified by both parties, the appeal site is located in a highly sustainable location and as a consequence, it is the view of the Council, that the site would lend itself to a different housing mix with more smaller units. Despite this, their assertion has not been supported by information in relation to specific housing need in terms of size of units and proposed tenure. I do not doubt that a different internal configuration would enable a greater number of units to be provided which may facilitate some affordable housing. However, in the absence of substantive evidence, I have no reason to agree that it would be a necessary provision.
15. The Framework encourages the effective and efficient use of land. In this regard, the proposal would redevelop an area of previously developed land to provide both residential and commercial accommodation. In addition, the accommodation proposed would meet, and in some instances, exceed required floor areas. Accordingly, I have no reason to consider that the accommodation provided would not be of a high quality.
16. I am required to assess the appeal against the evidence presented before me, and on this basis, despite the perceived shortcomings of the Council, I have no compelling evidence before me to suggest that a different mix would be necessary in terms of housing need. I therefore conclude that the proposal

would make efficient use of the site and would therefore comply with Policies 3.11 and 3.13 of the London Plan (2016), Policy CS1 of the CS, Policy DM24 of the DMP, and guidance contained within the SPG, the Mayor's Affordable Housing SPG (2017), and the Planning Obligations and Affordable Housing Supplementary Planning Document (2013). Taken together, these establish affordable housing targets and thresholds and seek a housing mix which contributes to the creation of inclusive and mixed communities.

Other Matters

17. The proposal would make a small but useful contribution to local housing supply. In addition, it would bring with it economic benefits including the creation of new jobs and inward investment into the local economy. These matters weigh in favour of the proposal but do not outweigh the fundamental concerns that I have identified above.

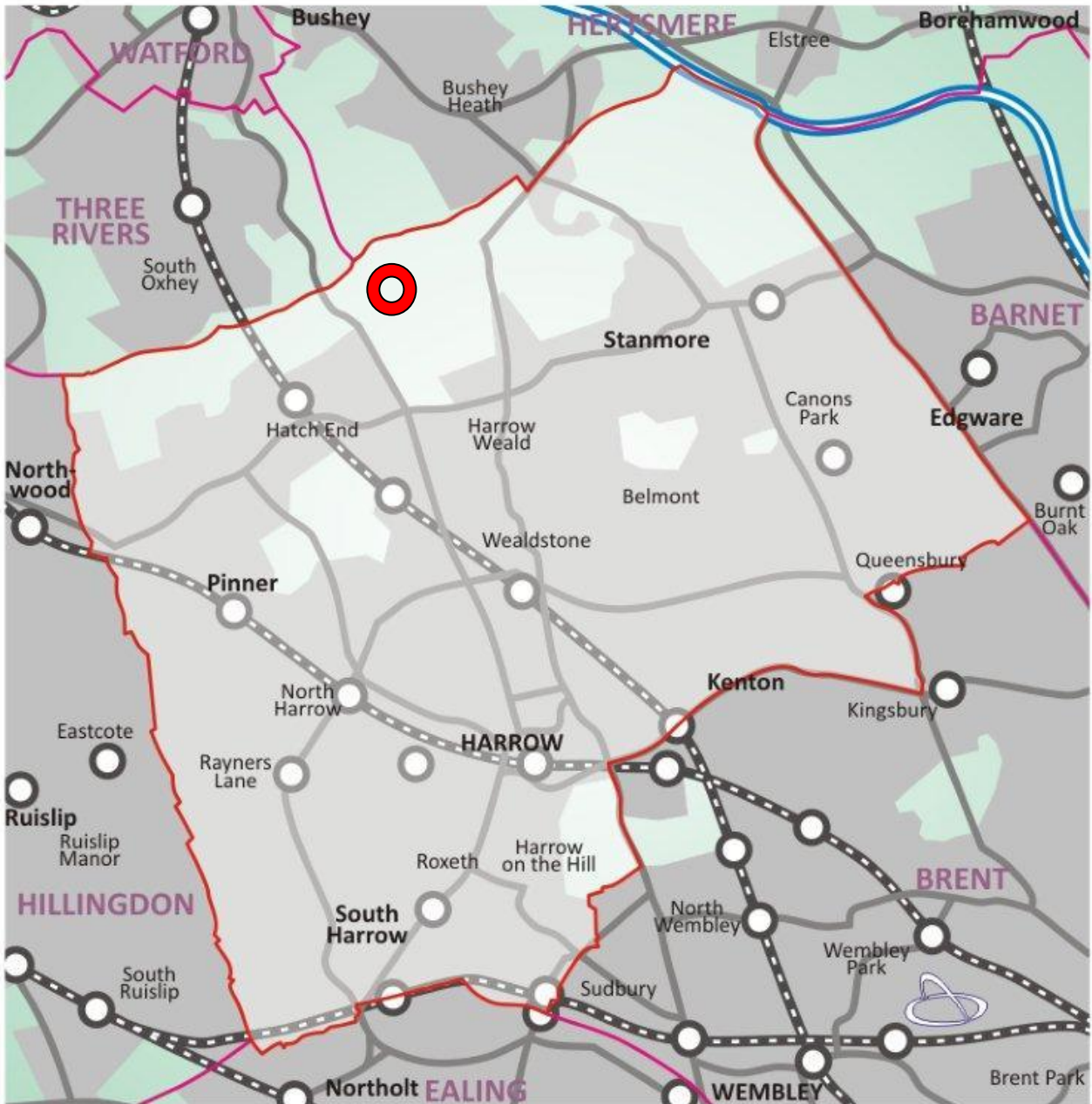
Conclusion

18. I have found that the proposal would provide an acceptable housing mix that would contribute to local housing supply. This attracts some moderate weight in favour of the proposal. However, I have also found that the proposed pedestrian access would fail to provide a safe, secure and appropriately accessible environment. Accordingly, it would not provide suitable living conditions for future occupants and this is a matter to which I attach significant weight, and which outweighs the benefits of the proposal.
19. Accordingly, for the reasons identified above, the appeal should be dismissed.

Martin Chandler

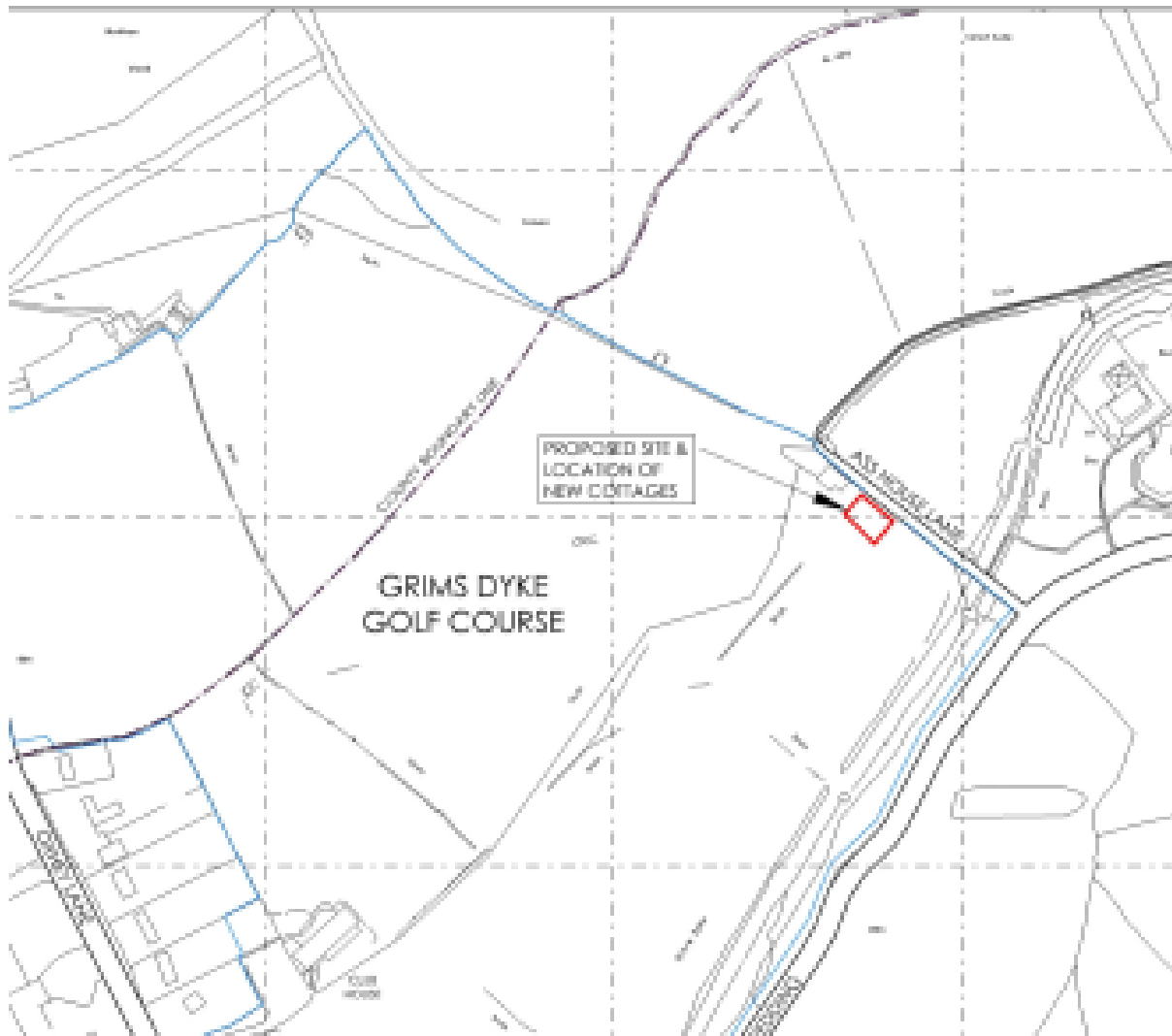
INSPECTOR

 = application site



Bankfield Cottages, Ass House Lane	P/3983/20
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BANKFIELD COTTAGES, ASS HOUSE LANE



LONDON BOROUGH OF HARROW

PLANNING COMMITTEE

20th January 2020

APPLICATION NUMBER: P/3983/20
VALID DATE: 26TH NOVEMBER 2020
LOCATION: BANKFIELD COTTAGES, ASS HOUSE LANE
HARROW
WARD: HARROW WEALD
POSTCODE:
APPLICANT: GRIMS DYKE GOLF CLUB
AGENT: MR MICHAEL UBAKA
CASE OFFICER: FAYE MCELWAIN
EXPIRY DATE: 29TH DECEMBER 2020 EXTENDED TO 31ST
JANUARY 2021

PROPOSAL

Development To Provide A Pair Of Two Storey Semi-Detached Dwellings (2 X 3 Beds); Access; Parking; Landscaping And Bin Store (Demolition Of Bankfield Cottages)

RECOMMENDATION A

The Planning Committee is asked to:

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

Heads of Terms for the Legal Agreement

- To only implement either planning permission P/3026/05/CFU or planning permission P/3983/20.
- To notify the Council the date of the construction of the development authorised by either planning permission P/3026/05/CFU or planning permission P/3983/20 together with a statement confirming which of the two planning permissions is being implemented.
- In the event that planning permission P/3026/05/CFU is implemented not to implement or cause permit or allow the implementation of any part of planning permission P/3983/20.

- Legal fees and administration/monitoring: Payment of Harrow Council’s reasonable costs in the preparation of the Legal agreement and administration costs/monitoring costs in accordance with the adopted fees and charges schedule.

RECOMMENDATION B

That if, by 20th April 2021 or such extended period as may be agreed in writing by the Interim Chief Planning Officer, the section 106 Planning Obligation is not completed, then delegate the decision to the Interim Chief Planning Officer to **REFUSE** planning permission for the following reason:

The proposed development, in the absence of a legal agreement, would enable both planning permission P/3026/05/CFU and P/3983/20 to be implemented on site which would constitute inappropriate development in the Green Belt, to the detriment of the character and appearance and openness of the Green Belt, contrary to the National Planning Policy Framework (2019), policy 7.16B of The London Plan (2016), policy G2 of the Publication London Plan (2020), Core policy CS1 F of the Harrow Core Strategy (2012) and policy DM 16 of the Harrow Development Management Policies Local Plan (2013) and no very special circumstances have been demonstrated by the applicant whereby the harm by reason of inappropriateness is outweighed by other considerations.

REASON FOR THE RECOMMENDATION

The creation of two dwellings on the site are appropriate replacement buildings in this Green Belt location and do not appear at odds with the existing character of development in the immediate area and would not have an adverse impact on the amenity of future occupiers or the occupiers of adjoining properties in accordance with Policies 7.4B and 7.6B of The London Plan (2016) and Policy DM1 of the DMP (2013).

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

INFORMATION

This application is reported to Planning Committee at the request of a nominated member to ensure the change of use is suitable. The application is therefore referred to the Planning Committee as it does not fall within any of the provisions set out at paragraphs 1(a)-1(h) of the Scheme of Delegation dated 12th December 2018.

Statutory Return Type:	Minor Development (dwellings)
Council Interest:	None
Net Floorspace:	187sqm
GLA Community Infrastructure Levy (CIL) Contribution	£11220
Local CIL requirement (provisional):	£29661

HUMAN RIGHTS ACT

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

EQUALITIES

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

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

S17 Crime & Disorder Act

Policies 7.3.B and 7.13.B of The London Plan and Policy DM1 of the Development Management Policies Local Plan require all new developments to have regard to safety and the measures to reduce crime in the design of development proposal. It is considered that the development does not adversely affect crime risk. However, a condition has been recommended for evidence of certification of Secure by Design Accreditation for the development to be submitted to and approved in writing by the Local Planning Authority before any part of the development is occupied or used.

1.0 SITE DESCRIPTION

- 1.1 The site is located within Grims Dyke Golf Course at the north western edge of the grounds on the southern side of Ass House Lane, an un-made roadway which transcends from Old Redding.
- 1.2 There is an existing green keeper's shed on the house further north up Ass House Lane. The former cottages (now demolished) were previously located north of this shed.
- 1.3 To the south, west and east are the open grounds of the golf club; to the north are other open and wooded areas of Harrow Weald Common.
- 1.4 The Golf Course and surrounding area is within the Green Belt and Harrow Weald Ridge Area of Special Character.

2.0 PROPOSAL

- 2.1 The application proposes to re-establish planning application P/2995/15 which proposed the construction of a pair of two-storey semi-detached cottages comprising of three bedrooms each with a footprint of approximately 50m² each. The new cottages would be located to the south east of an existing green-keeper's shed on south east side of Ass House Lane.

- 2.2 The houses would be 7m high with gabled roofs with chimneys rising approximately 2m above roof ridge and front and rear dormers to create a cottage appearance.
- 2.3 Three car parking spaces for the dwellings are provided to the north west of the plot, garden areas and landscaping including private amenity space for each of the dwellings.
- 2.4 It is proposed to provided a new copse of 5 Oak trees on location of previous houses.

3 RELEVANT PLANNING HISTORY

- 3.1 A summary of the relevant planning application history is set out in the table below:

Ref no.	Description	Status and date of decision
P/2995/15	DEVELOPMENT TO PROVIDE TWO X 2 STOREY DWELLINGS WITH ACCESS, PARKING, LANDSCAPING AND BIN STORAGE	Granted – 30/10/2015
P/3063/11	Extension of time to planning permission P/0838/08dfu dated 17/03/2009 for 'two two-storey semi-detached houses with parking'	Granted – 21/08/2012
P/0838/08/dfu	Two two-storey semi-detached houses with parking	Granted - 17/03/2009
P/3026/05/cfu	Renewal of permission of east/1229/00/ful: demolition and replacement of 2 two storey semi-detached houses with parking	Granted 09/06/2006
East/8/00/ful -	Demolition and replacement of two storey semi-detached houses with parking	Refused 08/09/200
Reason for Refusal: 1. The proposed development, by reason of its excessive size and bulk, would be visually obtrusive, out of keeping and amount to inappropriate development in this green belt location to the detriment of the character of the locality.		
East/1229/00/ful -	Demolition and replacement of two storey semi-detached houses with parking (revised)	Granted 09/03/2001

4 CONSULTATION

- 4.1 A total of nine properties were consulted and fifteen responses were recorded. The consultation period expired on 24th December 2020.

Summary of responses:-

- Inappropriate development in Green Belt.
- The footprint of the dwellings appears larger than the previous cottages.
- The previous location was more screened with trees.
- The dwellings are too close to Golf Course causing health and safety issues.
- The proposal would cause pressure on Ass House Lane and lead to traffic safety issues.
- The dwellings would impede the use of the golf course and cause distractions to players.

4.3 Statutory and Non Statutory Consultation

- 4.4 The following consultations have been undertaken:

Highways - This proposal is unlikely to result in a severe or harmful impact for the surrounding highway network, subject to provision of secure, sheltered and accessible cycle parking for a minimum of two cycles per dwelling, Highways have no objection

Drainage – In line with Development Management Policy 10, to make use of sustainable drainage measures to control the rate and volume of surface water runoff, to ensure separation of surface and foul water systems, make provision for storage and demonstrate arrangements for the management and maintenance of the measures used, the applicant should submit a surface water drainage strategy.

The use of non-permeable surfacing impacts upon the ability of the environment to absorb surface water, and hard surfacing of the front gardens and forecourts lead to localised surface water flooding. Hence the requirement for surface water to be contained within site and discharged to ground via the use of permeable paving or other suitable options.

The requested details can be conditioned with standard pre commencement drainage conditions/informatives

Secure By Design Officer – The development would benefit greatly from a Secured By Design input, and should be looking to achieve a Secured By Design award.

5 POLICIES

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

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

5.2 In this instance, the Development Plan comprises The London Plan 2016, The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan (AAP) 2013, the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan SALP 2013 [SALP].

5.3 While this application has been considered against the adopted London Plan (2016) policies, significant regard has also been given to policies in the Publication London Plan (2020), as this will replace the current London Plan (2016) when published and form part of the development plan for the Borough.

5.4 The Publication London Plan was originally published in draft form in December 2017 and subject to Examination in Public (EiP) with the Panel’s report received in October 2019. The Secretary of State issued two sets of directions on policies in the subsequent London Plan (Intend to Publish Version) (2019). The Mayor of London has accepted the Secretary of State directions and has now sent the Publication London Plan (2020) to the Secretary of State for final approval to publish. As such, the entire Plan can be given significant weight. The Secretary of State has until the 1st February 2021 to either agree the Plan or issue further directives. Should the Publication London Plan (2020) be agreed by the Secretary of State, the Mayor of London will be in a position to publish it, thereby superseding the London Plan (2016) and giving it full weight as part of the Council’s development plan

5.5 The Publication London Plan (2020) is a material planning consideration that holds significant weight in determining planning applications, with relevant policies referenced within the report below and a summary within Informative 1.

6.0 ASSESSMENT

6.1 The main issues are;

- Principle of the Development
- Design, Character and Appearance of the Area
- Residential Amenity
- Traffic, Safety and Parking
- Development and Flooding
- Development and

6.2 Principle of Development

6.2.1 The relevant policies are:

- National Planning Policy Framework (2019)
- London Plan (2016) 7.16
- Harrow Core Strategy (2012): CS1F
- Harrow Development Management Policies Local Plan (2013): DM1, DM16

6.2.2 Green Belt Policy allows for replacement buildings of a similar scale. The original pair of semi-detached dwellings on the site have been demolished as a part of the commencement of the development granted under planning permission P/3026/05/CFU on 09/06/2006. This permission is therefore considered to have been implemented even though the development (i.e. the construction work) is yet to commence and a period of sixteen years has passed. This interpretation is firmly established in case law. For example in Pioneer Aggregates (UK) Ltd v Secretary of State for the Environment and Peak Park Joint Planning Board, the House of Lords held that, as planning permission ensues for the benefit of the land, and for the purposes of the planning permission it cannot be abandoned. Therefore it is firmly acknowledged that the applicant could complete the construction of this development without the need for further planning permission. The replacement dwellings approved under this application were considered to be comparable in scale to the demolished dwellings and therefore having a neutral impact on the openness of the Green Belt.

6.2.3 The most recent planning permission (P/2991/15), which has now expired, allowed for two semi-detached dwellings. The current application proposes to re-establish this permission. P/2991/15 allowed for two cottages of a similar scale that was approved by P/3026/05/CFU in a revised location. This application was a renewal of planning permission P/3063/11 which itself was a renewal of East/8/00/ful. These permissions firmly establish the suitability of the scale of the replacement buildings and the three more recent applications confirm that this location for the cottages is suitable. It was accepted that the proposed cottages would not be materially larger than the original (now demolished) adjacent dwellings and the revised location is acceptable. However, when changing the location, the principle of the development was accepted subject to the applicant entering into a legal agreement to ensure that the extant 2005 permission could not be implemented in addition to the proposal under the 2015 permission as the combination of these two applications would result in a total of four new dwellings which would be harmful to the openness of the Green Belt.

6.2.4 As stated above, the current application merely proposes to re-establish the permission for the cottages in this location. Although the NPPF has been updated since the previous approval, the thrust of the Green Belt policy has not altered. There have been no other material changes in the site circumstances. Having regard to this, and the principle set by the previous approvals as well as regard to the fact that the site coverage of the proposed dwellings would be less than the previous dwellings on site, it is considered that in this case the principle of the development should be accepted.

6.2.5 Subject to a S.106 agreement for the reasons outlined above, it is considered that the proposed development would accord with the relevant policies.

6.3 Design, Character and Appearance of the Area

6.3.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan 2016: 7.4, 7.6
- The Publication London Plan 2020: D1, D2, D4, G2
- Harrow Core Strategy 2012: CS1F
- Harrow Development Management Policies Local Plan (2013): DM1; DM16

Relevant Supplementary Documents

- Residential Design Guide (2010)

6.3.2 In terms of Green Belt policy, as set out above, the proposed cottages would have a similar footprint to the original dwellings on the site and therefore are considered not to have a detrimental impact on Green Belt openness compared to the former buildings. The area proposed for development is surrounded by mature trees and vegetation. There is therefore no physical connection between the area of land proposed for development and any large built-up areas. The proposal would not therefore lead to unrestricted sprawl and the revised location of the dwellings is not considered to impact on openness.

6.3.4 The design would retain the concept of the two storey cottages and are considered to have an acceptable appearance. There are no other residential developments in close proximity to the site and therefore no architectural style to emanate. The cottages have a village like feel with the first floor being served by front and rear dormers which are positioned evenly and contained within the roofspace. The dwellings are of a modest scale and as pointed out above are of a comparable scale to the demolished dwellings. It is deemed necessary to restrict permitted development, to include the new legislation to extend upwards, to ensure that the dwellings remain of a suitable scale for this sensitive location. The scheme introduces the opportunity to implement improvements to the landscaping in the immediate area which can be achieved through the use of suitable conditions as per previous permissions.

6.3.5 There have been no material changes in the circumstances on the site, or significant changes to the character and appearance of the area that would warrant a different view on the design and appearance of the proposed development and its impact on the character and appearance of the area.

6.3.6 As such, the impact on the character and appearance of the Green Belt and Harrow Weald Ridge Area of Special Character and is considered to be acceptable and in accordance with the relevant policies.

6.4 Residential Amenity

6.4.1 The relevant policies are:

- National Planning Policy Framework (2019)
- Technical housing standards – nationally described space standard (2015)
- The Publication London Plan 2020: D1, D2, D3
- Harrow Core Strategy (2012): CS1
- Harrow Development Management Policies Local Plan (2013): DM1

6.4.2 Gross Internal Area and room sizes of the proposed dwellinghouses would meet the required standards. Minor revisions to the plans have been secured to ensure that at least one bedroom is a standard double room in line with current guidelines. The living accommodation would be afforded a good outlook from all habitable rooms and all rooms are of a generous size with adequate floor to ceiling heights and the layout is acceptable. As such, the proposal is considered acceptable in this regard and would provide acceptable living accommodation for the future occupiers.

6.4.3 The plot is split to provide private amenity for each of the dwellings and although this is to the front and the rear given that the plot is secluded this provision is considered suitable. The bin storage is provided within the proposed parking area and is considered to be adequate to serve the dwellings.

6.4.4 There are no other residential properties in close proximity to the site and therefore there is not considered to be any significant impact on the amenity of the occupiers of neighbouring dwellings.

6.4.5 Therefore, the impact on residential amenity is considered to be acceptable and in accordance with the relevant policies.

6.6 Traffic, Safety and Parking

6.6.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan 2016: 6.3, 6.9, 6.13
- The Publication London Plan 2020 T4, T5, T6;
- Harrow Core Strategy 2012: CS1
- Harrow Development Management Policies Local Plan (2013): DM1, DM42,

6.6.2 The level of parking provision of 3 spaces is considered to be acceptable, particularly having regard to the PTAL level for the site. The application has been referred to the Highways Authority who don't raise any traffic issues have raised no objection to the proposal. A condition has been added to ensure that the parking spaces are utilised for the future residents of the new properties only as was agreed on the previous approval on the site.

6.6.3 At least two secure cycle spaces should be provided for each of the dwelling. A condition has been added to secure adequate provision.

6.6.5 The proposal is considered to be in acceptable in terms of transport implications in accordance with the relevant policies.

6.7 Development and Flooding

6.7.1 The application has been referred to the Council's drainage engineer. There are no objections to the proposal subject to suitable sustainable drainage measures to control the rate and volume of surface water runoff, to ensure separation of surface and foul water systems, make provision for storage and demonstrate arrangements for the management and maintenance of the measures used and to ensure suitable permeable paving is utilised for the proposed parking and hardstanding areas. Conditions have been added to this effect.

6.8 Trees and Development

6.8.1 The relevant policy is DM 22 of the Development Management Policies Local Plan.

6.8.2 Trees line both sides of Ass House Lane. As was the case in the previous application it is proposed to plan a new copse of five oak trees in the location of the previous cottages on the site which is welcomed. A condition has been added to ensure that this tree planting is implemented. As the site circumstances have not changed since the previous application, the proposal is considered acceptable subject to the imposition of conditions pertaining to tree protection during construction.

6.8.3 The proposal is considered acceptable in accordance with the relevant policy.

6.9 Crime and Development

6.9.1 The relevant policies 7.3.B and 7.13.B of The London Plan and policy DM1 of the Development Management Policies Local Plan.

6.9.2 It is considered that the development does not significantly adversely affect crime risk. A condition has been attached to ensure that the scheme complies with Secure By Design requirements as recommended by the Secure By Design Officer.

6.10 Conflicts with other uses

6.10.1 A number of neighbours raise concerns regarding the potential for stray balls from the golf course causing health and safety issues for the future occupiers and members of the Golf Club have written to state that they object because the siting of the dwellings would cause distractions to players. It is understood that the location was revised from the previous location of the demolished cottages because the previous siting was more susceptible to being hit by golf balls. There are no planning policies to control such a conflict of use and in the event that the

permission was to be built out this would be a civil matter between the Golf Course and the future occupiers to resolve.

7.0 CONCLUSION AND REASONS FOR APPROVAL

- 7.1 The proposed development would not unduly impact on the character of the Green Belt or appearance of the area or the amenities of the future residential occupiers subject to the S106 as detailed above and the attached conditions. The proposed development would therefore accord Policy CS1 of the Harrow Core Strategy 2012, Policies 7.4 and 7.6 of the London Plan (2016), Policies D1-D4 and G2 of the Publication London Plan (2020) and policies DM1 and DM 16 of the Harrow Development Management Policies Local Plan (2013).

APPENDIX 1: Conditions and Informatives

Conditions

1. Full Time

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

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

2. Approved Plans:

The the development hereby permitted shall be carried out, completed and retained in accordance with the following approved plans and documents:
GDGC/15/LOC; GDGC/15/X1; GDGC/15/OD1 Rev A; GDGC/15/OD2 Rev A;
GDGC/15/OD3; GDGC/15/OD4; Design and Access Statement.

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

3. Materials

The development hereby permitted shall not commence beyond damp proof course level until samples of the materials to be used in the construction of the external surfaces noted below have been submitted to, and approved in writing by, the local planning authority:

- (a) building
- (b) the boundary treatment
- (c) the ground surfacing

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

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

REASON: To safeguard the character and appearance of the locality, in accordance with policy DM 1 of the Harrow Development Management Policies Local Plan (2013).

4. Landscaping

The development hereby permitted shall not commence until there has been submitted to, and approved by, the local planning authority, a scheme of hard and soft landscape works which shall include a survey of all existing trees and hedgerows on the land, indicating those to be retained and those to be lost. Details of those to be retained, together with measures for their protection in the course of the development, shall also be submitted and approved, and carried out in accordance with such approval, prior to any demolition or any other site works, and retained until the development is completed. Soft landscape works shall include:

planting plans, and schedule of plants, noting species, plant sizes and proposed numbers/densities.

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

5. Landscaping Implementation

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

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

6. Boundary Treatment

No development shall take place until a plan indicating the positions, design, materials and type of boundary treatment to be erected has been submitted to, and approved in writing by, the local planning authority. The boundary treatment shall be completed before the buildings are occupied.

REASON: To safeguard the character and appearance of the locality, in accordance with policy DM 1 of the Harrow Development Management Policies Local Plan (2013).

7. Car Parking Spaces

The proposed three car parking spaces shall be used only for the parking of private motor vehicles in connection with the development hereby permitted and for no other purpose.

REASON: To ensure that the parking provision is available for use by the occupants of the site and in accordance with the Council's parking standards as set out under policy DM 42 of the Harrow Development Management Policies Local Plan (2013).

8. Sewage Disposal

The buildings hereby permitted shall not be occupied until details of works for the disposal of sewage have been submitted to and approved in writing by, the local planning authority. The works shall be implemented in accordance with the approved details and shall thereafter be retained.

REASON: To ensure that adequate drainage facilities are provided, reduce and mitigate the effects of flood risk in accordance with the National Planning Policy Framework (2019) and Policy DM 10 of the Harrow Development Management Policies Local Plan (2013).

9. Surface Water Disposal

The development hereby permitted shall not be commenced until details of works for the disposal of surface water and surface water storage and attenuation works have been submitted to and approved in writing by, the local planning authority. The works shall be implemented in accordance with the approved details and shall thereafter be retained.

REASON: To ensure that adequate drainage facilities are provided, reduce and mitigate the effects of flood risk in accordance with the National Planning Policy Framework (2019) and Policy DM 10 of the Harrow Development Management Policies Local Plan (2013).

10. Permeable Paving

All hardsurfacing shall EITHER be constructed from porous materials, for example, gravel, permeable block paving or porous asphalt, OR provision shall be made to direct run-off water from the hard surfacing to a permeable or porous area or surface within the curtilage of the site. Please note: guidance on permeable paving has now been published by the Environment Agency on <http://www.communities.gov.uk/publications/planningandbuilding/pavingfrontgardens>.

REASON: To ensure that adequate and sustainable drainage facilities are provided, and to prevent any increased risk of flooding, in accordance with policy DM10 of the Councils Development Management Policies Local Plan 2013.

11. Levels

No site works or development shall commence until details of the levels of the building(s), road(s) and footpath(s) in relation to the adjoining land and highway(s), and any other changes proposed in the levels of the site, have been submitted to, and approved in writing by, the local planning authority.

REASON: To ensure that the works are carried out at suitable levels in relation to the highway and adjoining properties in the interests of the amenity of neighbouring residents, the appearance of the development, drainage, gradient of access and future highway improvement, in accordance with policies DM1 of the Councils Development Management Policies Local Plan 2013.

12. Tree Protection Plan

The development hereby permitted shall not be commenced until a Tree Protection Plan, has been submitted to, and approved in writing by, the local planning authority. The Tree Protection Plan must be implemented as approved.

REASON: The existing trees represent an important amenity feature which the local planning authority considers should be protected in accordance with policy DM 22 of the Harrow Development Management Policies Local Plan (2013).

13. Tree Protection Implementation

The erection of fencing for the protection of any retained tree shall be undertaken in accordance with the approved plans and particulars before any equipment, machinery or materials are brought on to the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition, and the ground levels within those areas shall not be altered, nor shall any excavation be made, without the written consent of the local planning authority.

REASON: The existing trees represent an important amenity feature which the local planning authority considers should be protected in accordance with policy DM 22 of the Harrow Development Management Policies Local Plan (2013).

14. Tree Details

The plans and particulars submitted in accordance with the approval of landscaping condition shall include:-

- (i) a plan showing the location of, and allocating a reference number to, each existing tree on the site which has a stem with a diameter, measured over the bark at a point of 1.5 metres above ground level, exceeding 75mm, showing which trees are to be retained and the crown spread of each retained tree;
- (ii) details of the species, diameter (measured in accordance with para (i) above), and the approximate height, and an assessment of the general state of health and stability, of each retained tree and of each tree which is on land adjacent to the site and to which paragraphs (iii) and (iv) below apply;
- (iii) details of any proposed topping or lopping of any retained tree, or of any tree on land adjacent to the site;
- (iv) details of any proposed alterations in existing ground levels, and of the position of any proposed excavation within the crown spread of any retained tree or of any tree on land adjacent to the site;
- (v) details of the specification and position of fencing, and of any other measures to be taken for the protection of any retained tree from damage before or during the course of development.

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

15. New copse of Oak Trees

The copse of 5 English Oak trees indicated on plan number GDGC4/OD3 shall be planted in the first planting season following the occupation of the building(s), or the completion of the development, whichever is the sooner. Any new trees which, within a period of 5 years from the completion of the development, die, are removed, or become seriously damaged or diseased, shall be replaced in the next planting season, with others of a similar size and species, unless the local authority agrees any variation in writing.

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

16. Removal of Permitted Development 1

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

REASON: To safeguard the character of the area and the amenity of neighbouring residents, in accordance with policy DM1 the Councils Development Management Policies Local Plan (2013).

17. Removal of Permitted Development 2

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking or re-enacting that order with or without modification), no development which would otherwise fall within Classes A to F in Part 1 of Schedule 2 to that Order shall be carried out without the prior written permission of the local planning authority.

REASON: To safeguard the character of the area by restricting the amount of site coverage and size of dwelling in relation to the size of the plot and availability of:-

- (a) amenity space
- (b) parking space
- (c) openness of the site

and to safeguard the amenity of neighbouring residents in accordance with policy DM 1 of the Harrow Development Management Policies Local Plan (2013).

18. Removal of Permitted Development 3

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking or re-enacting that Order with or without modification), no development within Schedule 2, Part 20, Class AB shall take place and the building shall remain two storeys in height only.

REASON: To enable the Local Planning Authority to fully consider the effects of development normally permitted by the Town and Country Planning (General Permitted Development) Order 2015 on the impact on the adjoining grade II listed heritage asset.

19. Cycle Parking

Prior to occupation of the dwellings hereby approved, details of the secure cycle parking to serve dwelling will be submitted to, and approved in writing by, the local planning authority. The plans must show dimensions, type of storage and type of stand. The cycle parking shall be carried out in accordance with the approved details and shall thereafter be retained.

REASON: To promote sustainable development and transport choice in accordance with policy DM 42 of the Harrow Development Management Policies Local Plan (2013).

20. Secure By Design

Prior to the first occupation of the development, evidence of Secured by Design Certification shall be submitted to the Local Planning Authority to be agreed in writing, or justification shall be submitted where the accreditation requirements cannot be met. Secure by design measures shall be implemented and the development shall be retained in accordance with the approved details.

REASON: In the interests of creating safer and more sustainable communities and to safeguard amenity by reducing the risk of crime and the fear of crime

Informatives

1. The following policies are relevant to this decision:

National Planning Policy Framework (2019)

The London Plan (2016):

3.3 Increasing Housing Supply
3.5C: Quality and design of housing developments
6.3 Assessing effects of development on transport capacity
6.9 Cycling
6.13 Parking
7.16 Green Belt
7.3B Designing out crime
7.4B Local character
7.6B Architecture

The Publication London Plan (2020):

D1 London's form, characteristic and capacity for growth
D3 Optimising site capacity by the design led approach
D4 Delivering Good Design
T5 Cycling
T6 Car parking
G2 London's Green Belt

Harrow Core Strategy (2012):

Core policy CS1.B
Core policy CS1.D
Core Policy CS1 K
Core policy CS1.W

Harrow Development Management Policies Local Plan (2013):

DM1: Achieving a High Standard of Development
DM2: Achieving Lifetime Neighbourhoods
DM10: On Site Water Management and Surface Water Attenuation
DM16: Maintaining the Openness of the Green Belt and Metropolitan Land.
DM 24: Housing Mix
DM 26 Conversion of Houses and Other Residential Premises
DM27: Amenity space
DM29: Sheltered Housing, Care Homes and Extra Care Housing
DM 42: Parking Standards
DM45: Waste Management

Supplementary Planning Documents:

Supplementary Planning Document Residential Design Guide (2010)
Technical housing standards - nationally described space standard (2015).
Major of London Housing SPG (2016)

2 Pre-application engagement

Statement under Article 35(2) of The Town and Country Planning (Development Management Procedures) (England) Order 2015

This decision has been taken in accordance with paragraphs 187-189 of The National Planning Policy Framework. Harrow Council has a pre-application advice service and actively encourages applicants to use this service. Please note this for future reference prior to submitting any future planning applications.

3 Mayoral CIL

INFORMATIVE: Please be advised that approval of this application (either by Harrow Council, or subsequently by the Planning Inspectorate if allowed on appeal following a refusal by Harrow Council) will attract a Community Infrastructure Levy (CIL) liability, which is payable upon the commencement of development. This charge is levied under s.206 of the Planning Act 2008 Harrow Council, as CIL collecting authority, has responsibility for the collection of the Mayoral CIL The Provisional Mayoral CIL liability for the application, based on the Mayoral CIL levy rate for Harrow of £60/sqm is £11220 .

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

You are advised to visit the [planningportal](https://ecab.planningportal.co.uk) website where you can download the appropriate document templates.

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

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

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

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

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

The above forms should be emailed to HarrowCIL@Harrow.gov.uk

Please note that the above forms must be completed and provided to the Council prior to the commencement of the development; failure to do this may result in surcharges and penalties

4 Harrow CIL

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

Harrow's Charges are:

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

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

Retail (Use Class A1), Financial & Professional Services (Use Class A2),

Restaurants and Cafes (Use Class A3) Drinking Establishments (Use Class A4)

Hot Food Takeaways (Use Class A5) - £100 per sqm

All other uses - Nil.

The Provisional Harrow CIL liability for the application, based on the Harrow CIL levy rate for Harrow of £110/sqm is £29661

This amount includes indexation which is 323/224. The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).

The CIL Liability is payable upon the commencement of development.

You are advised to visit the planningportal website where you can download the relevant CIL Forms.

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

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

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

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

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

The above forms should be emailed to HarrowCIL@Harrow.gov.uk

Please note that the above forms must be completed and provided to the Council prior to the commencement of the development; failure to do this may result in surcharges.

5 Considerate Contractor Code of Practice

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

6 Party Wall Act

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

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

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

"The Party Wall etc. Act 1996: Explanatory booklet" is available free of charge from:

Communities and Local Government Publications, PO Box 236, Wetherby, LS23 7NB

Please quote Product code: 02 BR 00862 when ordering

Also available for download from the CLG website:

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

Tel: 0870 1226 236 Fax: 0870 1226 237

Textphone: 0870 1207 405

E-mail: communities@twoten.com

7 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.

8 Liability For Damage to Highway

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

9 Street Numbering

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

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

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

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

10 Sustainable Drainage Systems

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

SUDS involve a range of techniques including soakaways, infiltration trenches,

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

Where the intention is to use soak ways they should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365.

Support for the SUDS approach to managing surface water run-off is set out in the National Planning Policy Framework (NPPF) and its accompanying technical guidance, as well as the London Plan. Specifically, the NPPF (2012) gives priority to the use of sustainable drainage systems in the management of residual flood risk and the technical guidance confirms that the use of such systems is a policy aim in all flood zones. Policy 5.13 of the London Plan (2016) requires development to utilise sustainable drainage systems unless there are practical reasons for not doing so. Sustainable drainage systems cover the whole range of sustainable approaches to surface drainage management. They are designed to control surface water run-off close to where it falls and mimic natural drainage as closely as possible. Therefore, almost any development should be able to include a sustainable drainage scheme based on these principles.

The applicant can contact Harrow Drainage Section for further information.

11. Designing Out Crime

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

Checked

Interim Chief Planning Officer	Orla Murphy pp Beverley Kuchar 7.1.2021
Corporate Director	Paul Walker 7.1.2021

APPENDIX 3: SITE PHOTOS

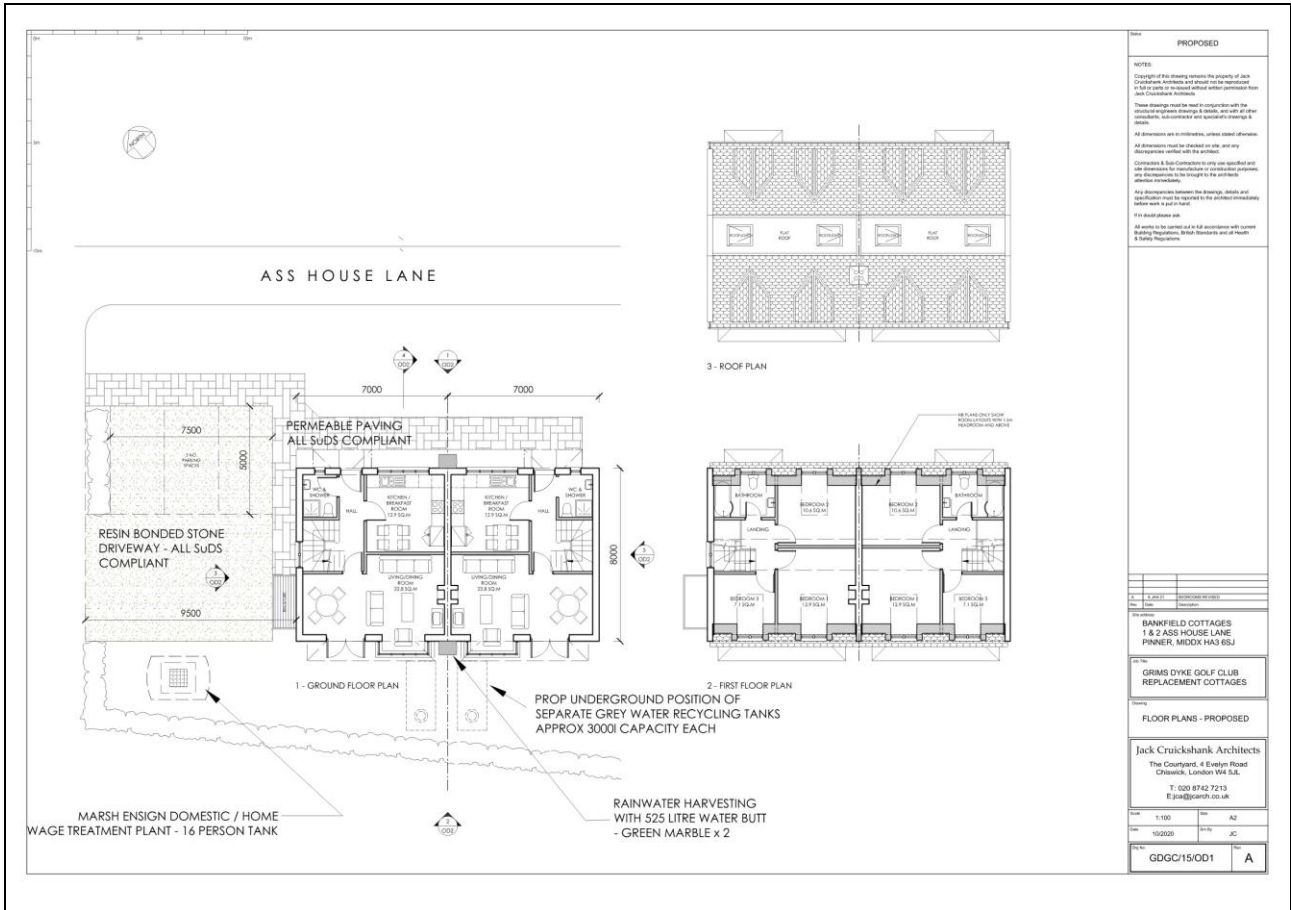




APPENDIX 4: PLANS & ELEVATIONS

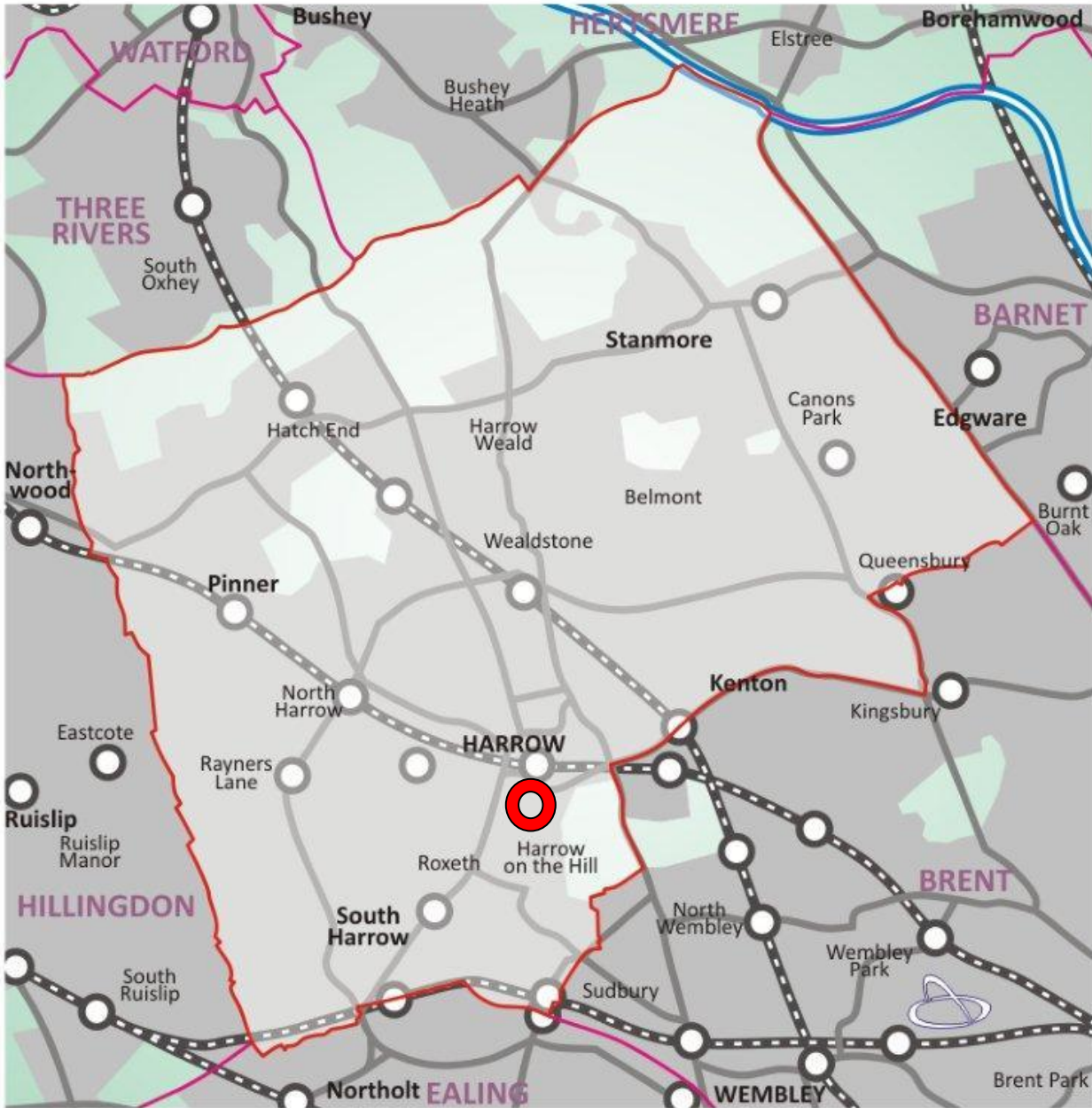


Proposed Elevations



Proposed Floor Plans

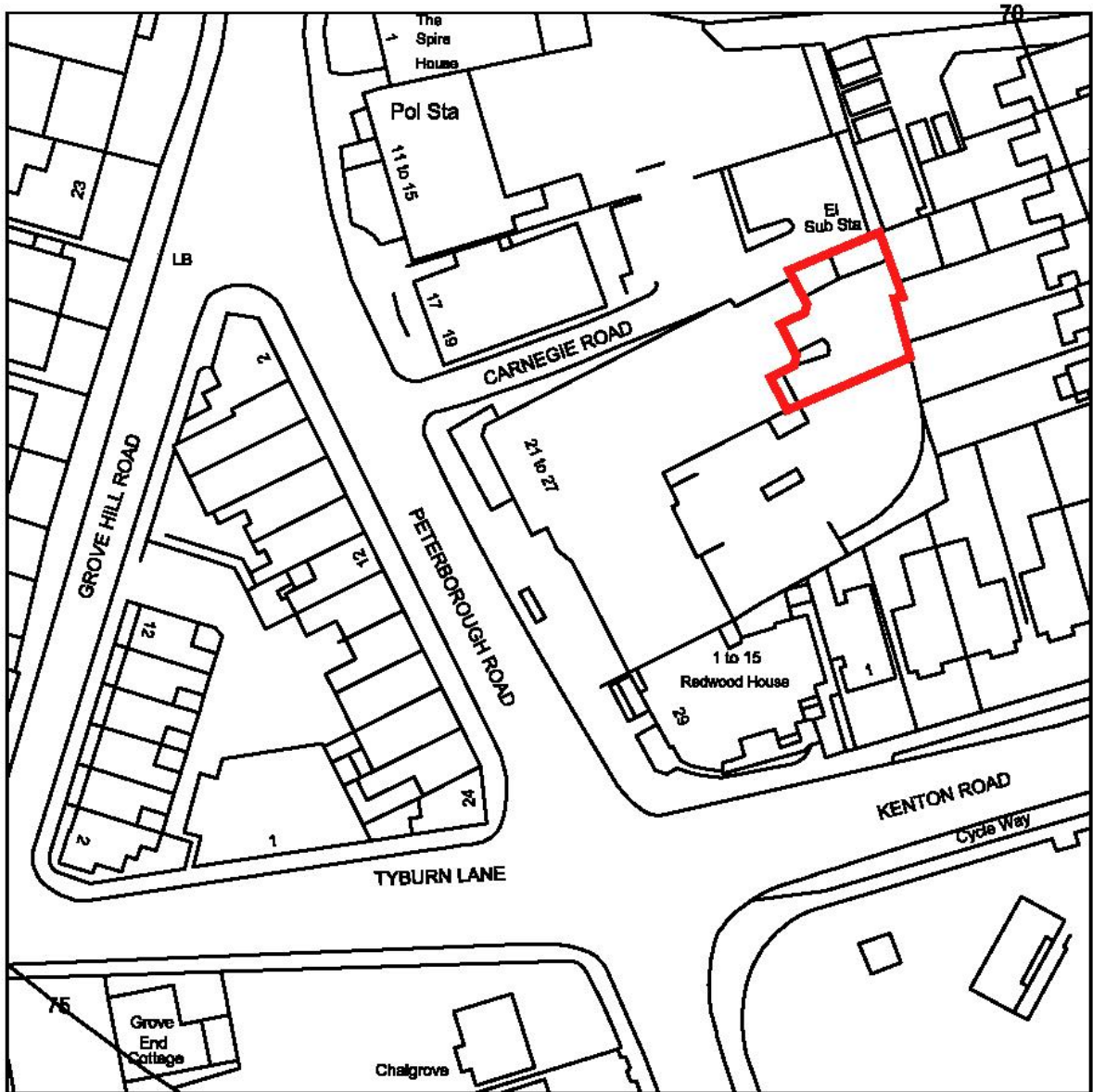
 = application site



Carnegie House, 21 Peterborough Road, HA1 2AX

P/2799/20

Carnegie House, 21 Peterborough Road



**SITE LOCATION PLAN
CARNEGIE HOUSE
HARROW HA1 2AJ**

LONDON BOROUGH OF HARROW

PLANNING COMMITTEE

20th January 2021

APPLICATION NUMBER: P/2799/20
VALIDATION DATE: 11th AUGUST 2021
LOCATION: CARNEGIE HOUSE, 21 PETERBOROUGH ROAD,
HARROW
WARD: GREENHILL
POSTCODE: HA1 2AX
APPLICANT: MR KENNEDY
AGENT: QUICK PLANNING SOLUTIONS
CASE OFFICER: KIMRY SCHLACTER
EXTENDED EXPIRY DATE: 25TH JANUARY 2021

PROPOSAL

Variation of condition 2 attached to planning permission P/5102/17 dated 15/01/2018 (as varied by P/2885/19 dated 24.12.2019) to allow relocation of substation, refuse area and one parking space

The Planning Committee is asked to:

RECOMMENDATION

- 1) agree the reasons for approval as set out in this report, and
- 2) grant planning permission subject to subject to the Conditions listed in Appendix 1 of this report.

REASON FOR THE RECOMMENDATIONS

The proposal would represent a minor variation to the existing permission, which would not be considered to result in detrimental impacts, compared to the existing parking layout and waste storage. Furthermore, it is considered that the proposal would not have an unduly harmful impact on the residential amenities of the neighbouring or future occupiers.

INFORMATION

This application is reported to Planning Committee at the request of a nominated member in the public interest.

Statutory Return Type: Variation of Condition / Minor Development
Council Interest: None
Net additional Floorspace: 0sqm

GLA Community Infrastructure Levy (CIL) Contribution (provisional):	N/A
Local CIL requirement:	N/A

HUMAN RIGHTS ACT

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

EQUALITIES

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

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

S17 CRIME & DISORDER ACT

Policies 7.3.B and 7.13.B of The London Plan and Policy DM1 of the Development Management Policies Local Plan require all new developments to have regard to safety and the measures to reduce crime in the design of development proposal. It is considered that the development does not adversely affect crime risk.

1.0 SITE DESCRIPTION

- 1.1 The application premises are a four storey building on the west side of Peterborough Road, Harrow, and near to Harrow-on-the-Hill station.
- 1.2 The original building has been converted to flats under the prior approval scheme.
- 1.3 Principal pedestrian access is at the front from Peterborough Road and has both steps and a ramp.
- 1.4 The building contains an 'undercroft' car park and hard-surfaced car park at the rear, with access from Peterborough Road.
- 1.5 The site is not located in a Conservation Area and has no other statutory designations

2.0 PROPOSAL

- 2.1 Variation of conditions 2 (approved plans) attached to planning permission P/5102/17 dated 20.11.18 (as varied by P/2885/19 dated 24.12.2019), so as to alter the location of an (existing) electrical sub-station and part of the waste storage, and alter the parking layout.

2.2 The subject condition to be varied under planning permission P/5102/17 as varied by P/2885/19 is as follows:

2.	<p>Approved Plans</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans and documents: 0100P2, CAR-DAR-XX-00-DR-A-0101 REV P9, CAR-DAR-XX-00-DR-A-0102 REV P8, CAR-DAR-XX-00-DR-A-0103 REV P8, CAR-DAR-XX-00-DR-A-0104 REV P8, CAR-DAR-XX-00-DR-A-0105 REV P8, CAR-DAR-XX-00-DR-A-0106 REV P6, CAR-DAR-XX-00-DR-A-0130 REV P7, CAR-DAR-XX-00-DR-A-0131 REV P8, CAR-DAR-XX-00-DR-A-0132 REV P8, CAR-DAR-XX-00-DR-A-0161 REV P2</p> <p>REASON: For the avoidance of doubt and in the interests of proper planning.</p>
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2.3 The proposed amendment to the car parking layout would not result in a reduction in the number of spaces but would re-configure their locations.

2.4 The previously approved detached waste storage enclosure would be slightly modified in its dimensions. The materials for the roof of the outbuilding have also been changed from the previous specifications.

2.5 Some of the waste bins would be re-located to within the main building (as per the original permission); while the existing substation within the building would be re-located to the outbuilding.

3.0 RELEVANT PLANNING HISTORY

3.1 A summary of the relevant planning application history is set out in the table below:

Ref no.	Description	Status and date of decision
LBH/22354	Outline: three and four storey office building with parking including basement	Granted: 27/01/1983
LBH/32685	Four storey office building with basement and ground level car parking	Granted: 02/06/1988
LBH/36988	Four storey office building with basement and ground level car parking (revised)	Granted: 12/01/1990
P/1519/14	Conversion of offices (class B1a) to forty eight self-contained flats (class C3) (Prior approval of transport & highways impacts of the development)	Granted: 04/06/2014

	and of contamination risks and flooding risks on the site)	
P/5102/17	Three and four storey side extension from first floor level to provide 7 flats; Refuse and cycle storage	Granted: 20/11/2018
P/1281/19	Details pursuant to Conditions 4 (Sections), 5 (Construction Method Statement), 7 (Secured cycle storage) and 8 (Refuse storage) attached to planning permission P/5102/17 dated 20.11.18 for Three and four storey side extension from first floor level to provide 7 flats; Refuse and cycle storage	Refused: 10/05/2019
P/1840/19	Non material amendment to planning permission P/5102/17 dated 25/04/2018 to allow re-location of the bin and cycle stores; levels revised to preserve substation roof; external wall cladding; lift added to proposed extension; internal layouts revised; mechanical and electrical riser added for new services as required	Refused: 14/05/2019
P/1281/19	Details pursuant to Conditions 4 (Sections), 5 (Construction Method Statement), 7 (Secured cycle storage) and 8 (Refuse storage) attached to planning permission P/5102/17 dated 20.11.18 for Three and four storey side extension from first floor level to provide 7 flats; Refuse and cycle storage	Refused: 10/05/2019
P/1840/19	Non material amendment to planning permission P/5102/17 dated 25/04/2018 to allow re-location of the bin and cycle stores; levels revised to preserve substation roof; external wall cladding; lift added to proposed extension; internal layouts revised; mechanical and electrical riser added for new services as required	Refused: 14/05/2019
P/2023/19	Details pursuant to condition 3 (materials); condition 6 (travel plan); condition 10 (communal facilities for television reception) and condition 11 (air conditioning units) of planning permission p/5102/17 dated 25/04/2018 for three and four storey side	Refused: 02/07/2019

P/3657/19	Details pursuant to Condition 3 (Materials) attached to planning permission P/5102/17 dated 20/11/2018 for Three and four storey side extension from first floor level to provide 7 flats; Refuse and cycle storage	Approved: 06/11/2019
P/3656/19	Details pursuant to condition 5 (construction method statement) attached to planning permission P/5102/17 dated 20/11/2018 for three and four storey side extension from first floor level to provide 7 flats; refuse and cycle storage.	Approved: 07/11/2019
P/4756/19	Details pursuant to Conditions 4 (Sections), 7 (Cycle Storage) and 8 (Refuse Storage) attached to planning permission P/5102/17 dated 20/11/2018 for Three and four storey side extension from first floor level to provide 7 flats; Refuse and cycle storage	Approved: 12/12/2019
P/2885/19	Variation of conditions 2 (approved plans) 6 (travel plan) 7 (cycle storage) 8 (refuse storage) and 9 (building regs part m m4 (2)) attached to planning permission p/5102/17 dated 20.11.18 To allow amendments to first and second floor levels bin and cycle storage, and vary timing of travel plan	Granted: 24/12/2019
P/4084/20	Details pursuant to condition 10 (television reception) attached to planning permission P/2885/19 dated 04/09/2019 for three and four storey side extension from first floor level to provide 7 flats; Refuse and cycle storage	Granted: 6/01/2021

4.0 **CONSULTATION**

- 4.1 A total of 123 consultation letters were sent to neighbouring properties regarding this application. However, due to technical difficulties documents were not visible on the Council website during the above consultation period. As such, a second full consultation period was run once amended/additional information was received. Another consultation period was conducted after the submission of an additional plan clarifying the site boundaries in November 2020. The overall public consultation period expired on 24th December 2020.

4.2 A total of 3 responses were received.

4.3 A summary of the responses received along with the Officer comments are set out below:

Character and Appearance and Residential Amenity Impact

- Object to the substation relocation on the basis of noise and electromagnetic field to adjoining residential gardens, which would be hazardous to health, as well as flora/fauna. Would disturb enjoyment of garden by residents.
- Concern that lights for substation and parking area would disturb sleep for residents.
- Suggest that substation be re-located to the end of the entrance road adjacent garages instead.
- Concern that waste storage would attract vermin / has attracted vermin in the past.

Officer response:

These comments have been addressed within section 6.3 and 6.4 of the officer's report.

Other:

- Concern whether is it acceptable as a process to construct the substation/refuse station structure then apply for alterations after.
- More details about the type of substation to be installed are requested.

Officer response:

It is noted that the previous permission included the waste bin enclosure. It is within normal procedures to apply for minor variations to a structure which has permission whilst under construction. Technical details of the equipment are outside the purview of planning.

4.4 Statutory and Non Statutory Consultation

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

LBH Highways

- Following review of the car park layout, the aisle widths appear to be a bit narrow and below standard design requirements, therefore, tracking drawings should be provided to demonstrate that vehicles can safely enter and exit parking spaces, particularly between spaces 1, 5/20 and 9-15.

Comments to revisions:

- Whilst the revised plans are not ideal, this area isn't open to the public, so impacts are limited. Further redesign would be likely to result in a loss of spaces. From a policy perspective that's fine as this site is in a high PTAL

location anyway and wouldn't be allow parking if being considered today; but the layout is from an old permission so was considered differently at the time.

- The only risk is that poor car parking can result in overspill parking onto the highway but on-street options are limited in this location. This part of the development for 7 flats is permit restricted.
- On balance it is better to accept this layout.

Waste Management:

- No issues to raise with the proposed re-vamp of the bin areas as long as the gap in between them is wide enough to reverse into. Would question how they would reduce any fire potential with all the waste being attached to the electric substation and a gas mains being inside the same bin shed.

Comments to revisions:

- This arrangement should be fine. We were there last week seeing the new bin area being built. Access in and out is ok and appears to be plenty of room to get the bins out.

Building Control:

- If it is a substation rather than an electrical intake cupboard then the electrical utility company have strict guidelines in respect of fire resistance. Normally achieving a minimum of 4 hrs. An intake cupboard would need to achieve a minimum of 1 hours fire resistance.

Environmental Health Officer

- There is a case to request a noise report particularly if residents are concerned. We are not in a position to determine without seeing their assessment.

Comments to revisions:

- Having reviewed submitted noise report, no concerns are raised.

LBH Drainage

Do not have any drainage comments to be made.

5.0 POLICIES

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

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

5.2 In this instance, the Development Plan comprises The London Plan 2016, The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan (AAP) 2013, the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan SALP 2013 [SALP].

5.3 While this application has been considered against the adopted London Plan (2016) policies, significant regard has also been given to policies in the Publication London Plan (2020), as this will replace the current London Plan (2016) when published and form part of the development plan for the Borough.

5.4 The Publication London Plan was originally published in draft form in December 2017 and subject to Examination in Public (EiP) with the Panel's report received in October 2019. The Secretary of State issued two sets of directions on policies in the subsequent London Plan (Intend to Publish Version) (2019). The Mayor of London has accepted the Secretary of State directions and has now sent the Publication London Plan (2020) to the Secretary of State for final approval to publish. As such, the entire Plan can be given significant weight. The Secretary of State has until the 1st February 2021 to either agree the Plan or issue further directives. Should the Publication London Plan (2020) be agreed by the Secretary of State, the Mayor of London will be in a position to publish it, thereby superseding the London Plan (2016) and giving it full weight as part of the Council's development plan.

5.5 The Publication London Plan (2020) is a material planning consideration that holds significant weight in determining planning applications, with relevant policies referenced within the report below and a summary within Informative 1."

6.0 ASSESSMENT

6.1 The main issues are:

- Principle of the Development
- Character of the Area
- Residential Amenity
- Traffic, Parking and Servicing

6.2 Principle of Development

6.2.1 The relevant policies are:

- The National Planning Policy Framework (2019)
- The London Plan (2016): 3.3, 3.4, 3.8
- The Intend to Publish London Plan (2019): H2, H10
- Harrow Development Management Policies (2013): DM24
- Harrow's Core Strategy (2012): CS1

6.2.2 The principle of extensions to the property has already been considered acceptable under the previous permission. There has been no material change to the development plan nationally, regionally or locally since the decision relating to P/5102/17, for the purposes of this minor material amendment (s.73) application. As such, the assessment will consider the proposed variation of conditions.

6.3 Character of the Area

6.3.1 The relevant policies are:

- The National Planning Policy Framework (2019)
- The London Plan (2016): 7.4, 7.6
- The Intend to Publish London Plan (2019): D3
- Harrow Development Management Policies (2013): DM1, DM2, DM23
- Harrow's Core Strategy (2012): CS1
- Mayor of London Housing Supplementary Planning Guidance (2016)
- Supplementary Planning Document Residential Design Guide (2010)

6.3.2 The character and appearance of the overall development has previously been considered acceptable through the grant of planning permission P/5102/17 (dated 21/03/2018).

External Alterations

6.3.4 The proposed amendments would not result in any significant changes to the external fabric of the development, in comparison to the original permission ref: P/5102/17, or the subsequent previous Variation of Condition ref: P/2885/19. The primary change would be a small variation in the depth and width of the bin storage/substation outbuilding. The height would be altered from previous variation of the permission, from 2.5m to 2.7m at the eaves, and rising to 2.8m in the middle of the roof. The amended materials for the outbuilding roof are also considered acceptable. These changes are minimal and are not considered to result in a significant impact on the character and appearance of the scheme.

6.3.4 It is considered that the proposed changes to the approved scheme would be acceptable in terms of character and appearance.

6.4 Residential Amenity

6.4.1 The relevant policies are:

- The National Planning Policy Framework (2019)
- The London Plan (2016): 3.5, 7.2, 7.3, 7.6
- The Intend to Publish London Plan (2019): D5, D6, D11
- Harrow Development Management Policies (2013): DM1, DM2, DM27
- Harrow's Core Strategy (2012): CS1
- Mayor of London Housing Supplementary Planning Guidance (2016)
- Supplementary Planning Document Residential Design Guide (2010)

6.4.2 The residential amenity of the overall development has previously been considered acceptable through the grant of planning permission P/5102/17 (dated 21/03/2018).

Amenity for Existing/ Future Occupiers

6.4.3 The changes to the bin storage and substation locations would not affect the amenity of existing or future occupiers or accessibility of the development. Likewise, the changes to the car parking layout would not result in any net loss or gain of parking spaces and so would not result in significant changes to the facilities available for residents.

6.4.4 As discussed in more detail below, the proposed re-location of the electrical substation has been demonstrated, within the applicant's submitted Noise Report, to not result in undue noise or disturbance to occupiers of the nearest adjacent flats within the development. As there are no external alterations proposed to the existing building, there are no concerns raised with regard to increased overlooking, overshadowing, or visual impacts.

Amenity for Neighbouring Occupiers

6.4.5 The change in the width and depth of the waste storage/sub-station outbuilding would not impact upon amenity. The increase in the height of the outbuilding is acknowledged, but it is noted that the outbuilding remains limited to less than 3.0m in height (which, as a measure of comparison, would be the standard allowance for householder extensions adjacent a neighbouring boundary) and the outbuilding is located along the rear boundary of these neighbouring properties. As such, the changes in dimensions to the outbuilding are not considered to result in undue impacts on the neighbouring properties.

6.4.6 The proposed bin storage area has previously been approved in the outbuilding along the rear boundary, with full consideration for the impacts of this location on neighbouring occupiers. The changes to the footprint of the outbuilding would not result in significant differences to neighbouring amenity compared to the previously approved scheme. In addition, it is noted that the proposed changes would result in less waste storage in close proximity to the boundary with neighbouring properties than the previously approved scheme.

- 6.4.7 It is noted that some of the concerns raised about waste storage relate to improperly stored waste on site; the construction of the bin enclosure would be likely to improve the previous situation in this respect. With regard to concerns regarding vermin, proper storage within the enclosure, and the proposed new location for some of the waste within the building, would normally result in a decrease in risks of attracting vermin. The provisions of secure and adequately sized waste storage would be a material planning consideration. The management on site in practice and any issues that might arise would however fall outside the purview of planning, and so could not be controlled or addressed here.
- 6.4.8 With regard to the electrical substation, concern has been raised with regard to noise. A noise report has been submitted, which demonstrates a “worst-case” scenario, of a window within the nearest bedroom of the development, sited 6.6m away, and when open. This would result in result in a calculated noise level of 12dB to the window, which is an acceptable level. The nearest adjoining neighbouring windows to the east are 20m away, and so would be even less impacted. Whilst it is acknowledged that the rearmost part of the gardens for adjacent properties is closer than 6.6m to the proposed substation enclosure, the recommended criteria for habitable rooms adjacent the substation would be up to 35dB; while the predicted maximum level of noise from the door and louvre of the substation would be 25dBA. In addition, fencing runs between the substation and these neighbouring rear gardens, which would further mitigate noise. For these reasons, the proposal would not result in a level of noise that would be considered to have an undue impact on neighbouring properties. Therefore, the proposed location would be considered acceptable.
- 6.4.9 Additional concerns have been raised about the health impacts of electromagnetic fields and other unspecified health impacts arising from the electrical substation such as impacts on flora and fauna. In addition, concerns have been raised about the technical specifications of the equipment. These are not material planning considerations and lie outside the purview of planning. It is noted that electrical substations immediately adjacent to residential gardens are common throughout Harrow Borough, however.
- 6.4.10 There are no lights proposed as part of the amended details, and so overspill lighting would not be a consideration to this application.
- 6.4.11 For the reasons considered above, the proposal would be considered acceptable in terms of impacts on residential amenity.

6.5 Traffic, Parking and Servicing

6.5.1 The relevant policies are:

- The National Planning Policy Framework (2019)
- The London Plan (2016): 6.3, 6.9, 6.13
- The Intend to Publish London Plan (2019): T4, T5, T6
- Harrow Development Management Policies (2013): DM42, DM44, DM45
- Harrow's Core Strategy (2012): CS1
- Code of Practice for Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (2008)

6.5.2 The traffic, parking, and servicing of the overall development has previously been considered acceptable through the grant of planning permission P/5102/17 (dated 21/03/2018).

6.5.3 The proposal would result in alterations to the layout of the car parking for residents. This layout has been reviewed by the Highways Officer and has, on balance, been determined to be acceptable.

6.5.4 The original application showed the waste and recycling facilities for the residential units would be located within the building. This was later varied by a ref: P/2885/19 to provide a new external bin enclosure along the rear boundary, which was large enough to also accommodate waste from the pre-existing part of the building. This was considered an improvement to pre-existing circumstances. The external materials to be used have also previously been approved.

6.5.5 The amendments applied for here would re-locate some of the bins to the within the building again, while retaining some in the bin enclosure.

6.5.6 The Council's Waste team are satisfied with the proposed altered arrangements and access to the stores. The same number of bins has been provided, so the amount of waste storage provided with not be changed.

6.5.7 Given the above, it is considered that the proposed changes to the waste refuse storage would be satisfactory.

7.0 **CONCLUSION AND REASONS FOR APPROVAL**

- 7.1 The proposed scheme would represent a minor variation to the existing permission, which would not be considered to result in detrimental impacts, compared to the existing parking layout and waste storage. Furthermore, it is considered that the proposal would not have an unduly harmful impact on the residential amenities of the neighbouring or future occupiers.
- 7.2 For these reasons, weighing up the development plan policies and proposals, and other material considerations including comments received in response to notification and consultation as set out above, this application is recommended for grant.

Checked

Interim Chief Planning Officer	Orla Murphy pp Beverley Kuchar 7.1.2021
Corporate Director	Paul Walker 7.1.2021

APPENDIX 1: Conditions and Informatives

Conditions

1. Time Limit 3 years - Full Permission

The development hereby permitted shall be begun before the expiration of three years from the date of planning permission P/5102/17 dated 20.11.2018.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990.

2. Approved Drawing and Documents

Unless otherwise agreed in writing by the local planning authority, the development shall be carried out, retained and completed in accordance with the following approved drawings and documents:

0100P2, CAR-DAR-XX-00-DR-A-0102 REV P8, CAR-DAR-XX-00-DR-A-0103 REV P8, CAR-DAR-XX-00-DR-A-0104 REV P8, CAR-DAR-XX-00-DR-A-0105 REV P8, CAR-DAR-XX-00-DR-A-0106 REV P6, CAR-DAR-XX-00-DR-A-0130 REV P7, CAR-DAR-XX-00-DR-A-0131 REV P8, CAR-DAR-XX-00-DR-A-0132 REV P8, CAR-DAR-XX-00-DR-A-0161 REV P2; 0263P1; CAR-DAR-XX-00-DR-A—261 Rev P4; Substation Noise Assessment [Ref: LR01-20627, dated 5 October 2020]; 18118-002; 18118-003; 18118-004; CAR-DAR-XX-XX-DR-A-0231 Rev C10; Email dated 18/11/2020; 100A

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

3. Materials

The materials to be used in the construction of the external surfaces of the development hereby permitted shall match those used in the existing building.

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

4. Details of windows and doors

Notwithstanding the details shown on the approved drawings, the development hereby permitted shall be implemented as per the approved details for the windows and doors and the parapet details as approved under planning reference P/4756/19, unless otherwise approved in writing by the Local Planning Authority, and shall thereafter be retained in that form.

Reason: To enhance the appearance of the development and safeguard the character and appearance of the area.

5. Construction Method Statement & Logistics Plan

The development hereby permitted shall be carried out in accordance with the Construction Method Statement & Logistics Plan details agreed within the approved permission ref: P/3656/19 dated 07/11/2019. Any amendment or variation to those approved details must first be agreed in writing by the local planning authority.

REASON: To minimise the impacts of construction upon the amenities of neighbouring occupiers and highway safety.

6. Travel Plan

Prior to occupation of the development hereby permitted, a Travel Plan shall be submitted to, and approved in writing by the local planning authority. The travel plan shall be implemented in accordance with the approved details on or before the date of the commencement of the use on site and retained thereafter.

REASON: To safeguard the amenities of neighbouring residents and to ensure that highway safety is not prejudiced.

7. Cycle Storage

The approved cycle storage shall be made available prior to the first occupation of the development and shall be retained as such thereafter.

REASON: To ensure the satisfactory provision of safe cycle storage facilities, to provide facilities for all the users of the site and in the interests of highway safety and sustainable transport.

8. Refuse Storage

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

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

9. Accessibility

The development hereby permitted shall be constructed to the following specifications, and in accordance with the approved plans unless otherwise agreed in writing:

- i. Two (2) no. units to comply Part M, M4 (3) of the Building Regulations 2013 and thereafter retained in that form;
- ii. One (1) no. unit to Part M, M4 (3), Category 2: Accessible and Adaptable Dwellings" of the Building Regulations 2013 and thereafter retained in that form; and
- iii. Four (4) no. flats to comply with Part M, M4 (1) of the Building Regulations 2013 and thereafter retained in that form

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

10. Communal Facilities for Television Reception

The provision of communal facilities for television reception (e.g. aerials, dishes and other such equipment) shall be implemented as per the details approved under ref: P/4084/20, and shall thereafter be retained in that form. No other television reception equipment shall be introduced onto the walls or the roof of the building without the prior written approval of the Local Planning Authority.

REASON: To ensure that any telecommunications apparatus and other plant or equipment that is required on the exterior of the buildings preserves the high quality design of the buildings and spaces.

11. Building appearance

Any, extraction plant, air conditioning units and any other plant or equipment that is required on the exterior of the building shall be installed in accordance with details to be first submitted to the Local Planning Authority to be agreed in writing.

REASON: To ensure that any plant or equipment that is required on the exterior of the buildings preserves the highest standards of architecture and materials.

12. Secure by Design

Prior to the first occupation of the development, evidence of Secured by Design Certification shall be submitted to the Local Planning Authority in writing to be agreed, or justification shall be submitted where the accreditation requirements cannot be met. Secure by design measures shall be implemented the development shall be retained in accordance with the approved details.

REASON: In the interests of creating safer and more sustainable communities and to safeguard amenity by reducing the risk of crime and the fear of crime.

Informatives

1. Policies

The following policies and guidance are relevant to this decision:

National Planning Policy and Guidance:
National Planning Policy Framework (2019)

The London Plan (2016):
3.3, 3.5, 3.8, 6.3, 6.9, 6.13, 7.2, 7.3, 7.4, 7.6

Draft London Plan (Intend to Publish Version 2019):
D3, D5, D6, D11, H2, H10, T4, T5, T6.1

Harrow Core Strategy (2012):
CS1

Development Management Policies Local Plan (2013):
DM1; DM2; DM24, DM27; DM42, DM44, DM45

2. Pre-application engagement

Statement under Article 35(2) of The Town and Country Planning (Development Management Procedures) (England) Order 2015

This decision has been taken in accordance with paragraphs 187-189 of The National Planning Policy Framework. Pre-application advice was sought and provided and the submitted application was in accordance with that advice.

3. Considerate Contractor Code of Practice

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

4. Party Wall Act

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

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

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

"The Party Wall etc. Act 1996: Explanatory booklet" is available free of charge from:

Communities and Local Government Publications, PO Box 236, Wetherby, LS23 7NB

Please quote Product code: 02 BR 00862 when ordering
Also available for download from the CLG website:
<http://www.communities.gov.uk/documents/planningandbuilding/pdf/133214.pdf>
Tel: 0870 1226 236 Fax: 0870 1226 237
Textphone: 0870 1207 405
E-mail: communities@twoten.com

5. 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.

6. Liability for Damage to Highway

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

7. Surface and foul water connections

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

8. London Mayor's CIL Charges

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

The Provisional Mayoral CIL liability for the application, based on the Mayoral CIL levy rate for Harrow of £60/sqm is £40,560.00

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

You are advised to visit the [planningportal](https://ecab.planningportal.co.uk) website where you can download the appropriate document templates.

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

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

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

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

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

The above forms should be emailed to HarrowCIL@Harrow.gov.uk

Please note that the above forms must be completed and provided to the Council prior to the commencement of the development; failure to do this may result in surcharges and penalties

9. Harrow Council CIL Charges

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

Harrow's Charges are:

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

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

Retail (Use Class A1), Financial & Professional Services (Use Class A2),

Restaurants and Cafes (Use Class A3) Drinking Establishments (Use Class A4)

Hot Food Takeaways (Use Class A5) - £100 per sqm

All other uses - Nil.

The Provisional Harrow CIL liability for the application, based on the Harrow CIL levy rate for Harrow of £110/sqm is £74,360.00

This amount includes indexation which is 323/224. The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).

The CIL Liability is payable upon the commencement of development.

You are advised to visit the [planningportal](https://ecab.planningportal.co.uk) website where you can download the relevant CIL Forms.

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

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

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

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

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

The above forms should be emailed to HarrowCIL@Harrow.gov.uk

Please note that the above forms must be completed and provided to the Council prior to the commencement of the development; failure to do this may result in surcharges

10. Street numbering

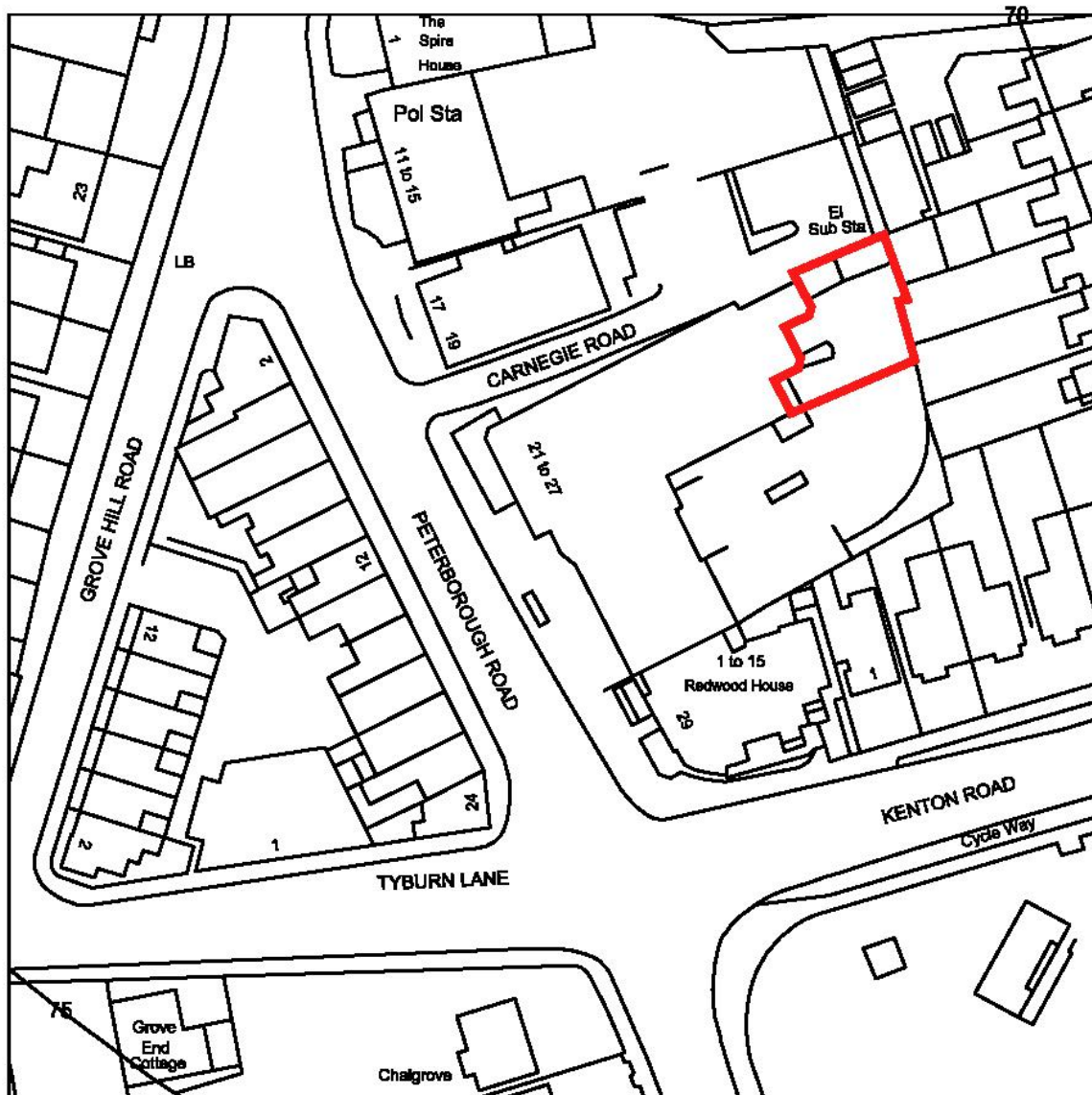
Harrow Council is responsible for the naming and numbering of new or existing streets and buildings within the borough boundaries. The council carries out these functions under the London Government Act 1963 and the London Building Acts (Amendment) Act 1939.

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

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

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

APPENDIX 2: SITE PLAN



**SITE LOCATION PLAN
CARNEGIE HOUSE
HARROW HA1 2AJ**

APPENDIX 3: SITE PHOTOGRAPHS



Outbuilding, as currently on site







With the main building





Proposed new location for some bins / existing substation location



Pre-existing photos of substation location





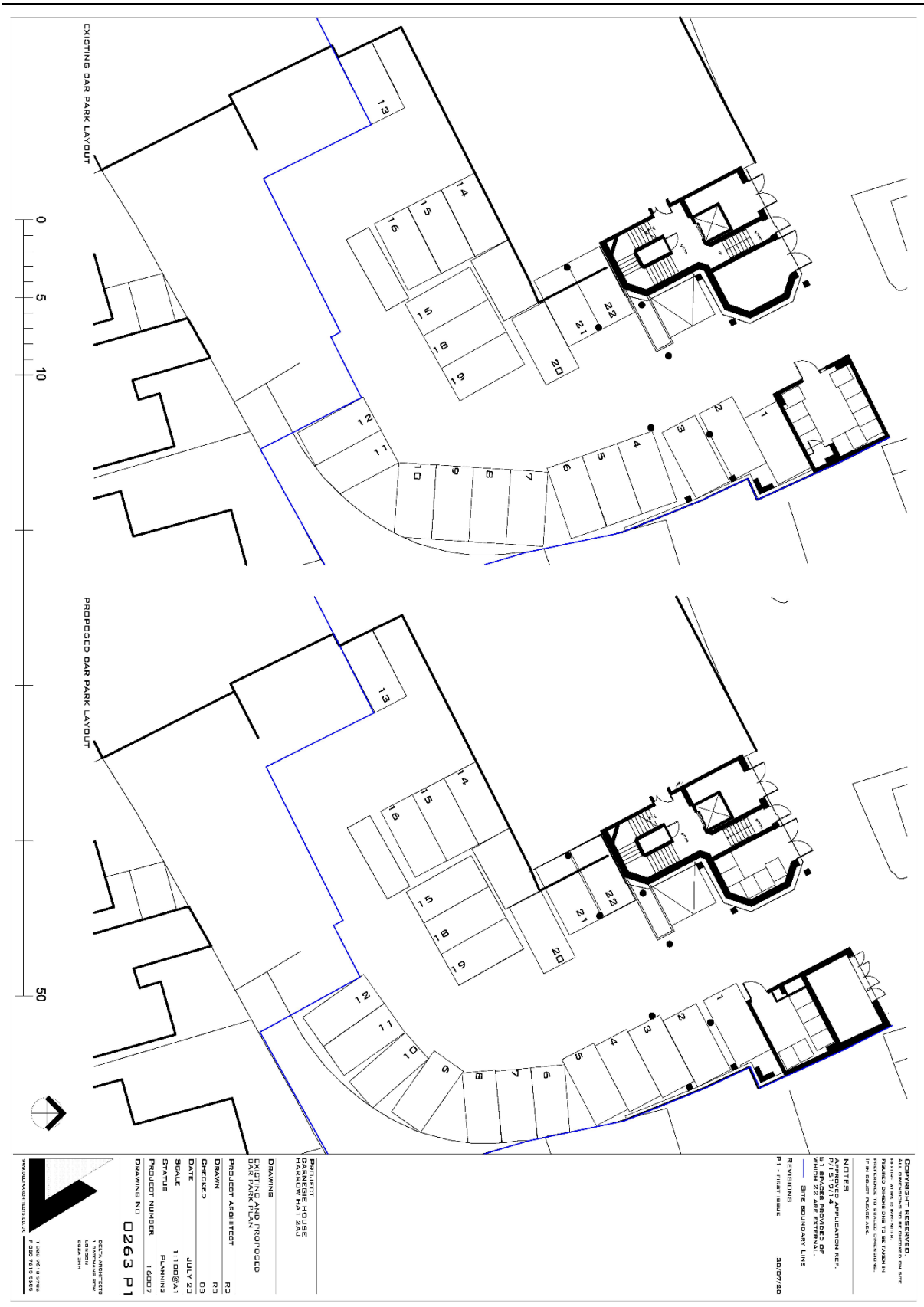
Previous waste storage area (pre-existing)



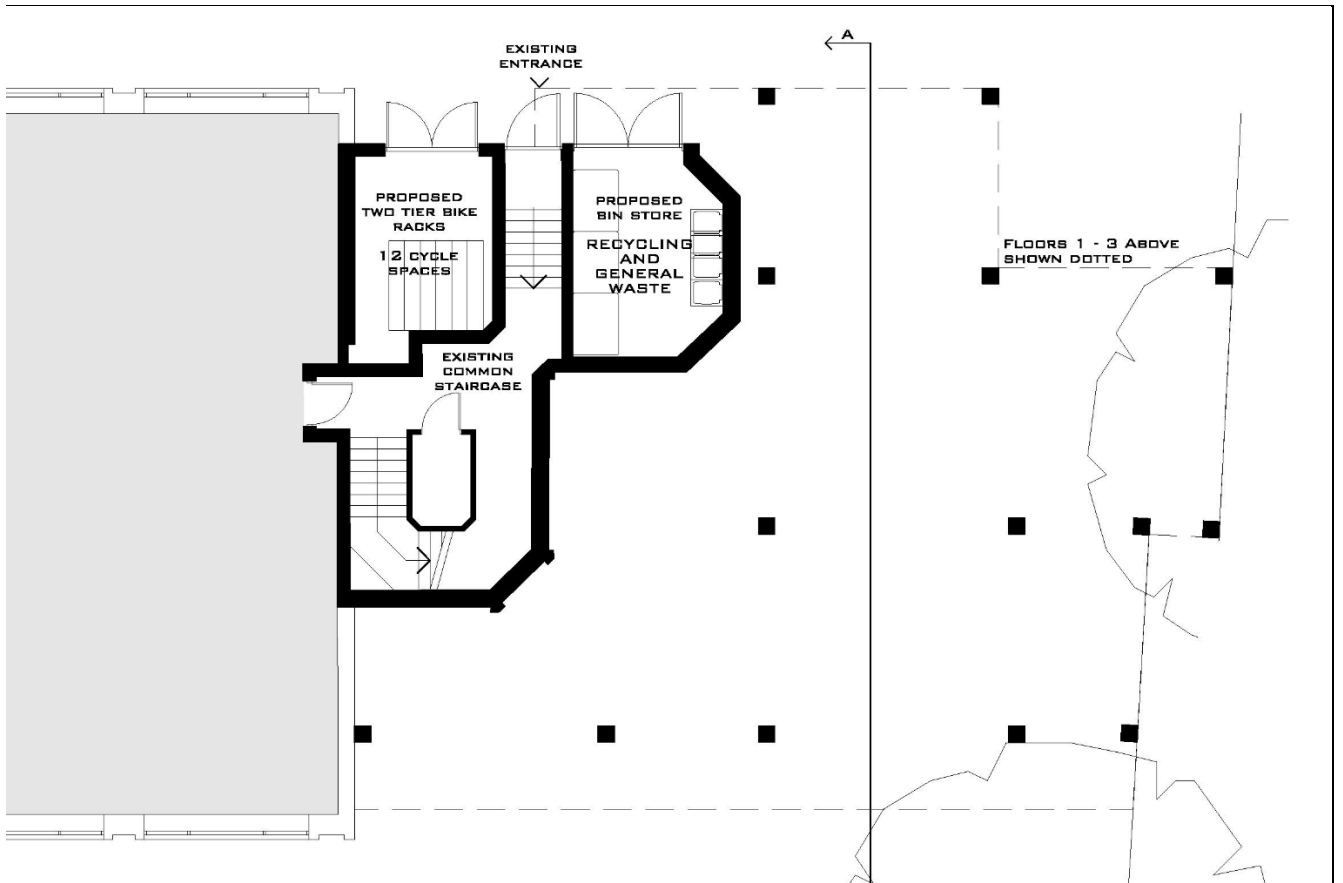


Waste on site (pre-existing)

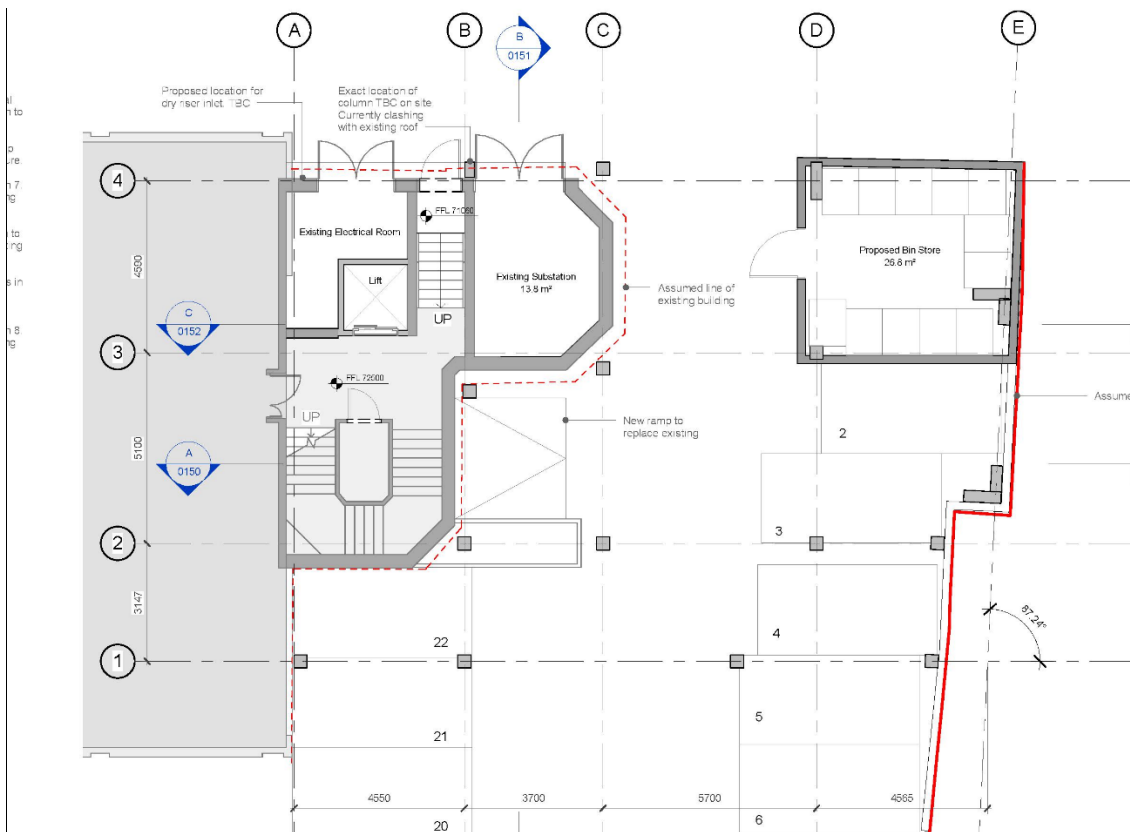
APPENDIX 4: PLANS AND ELEVATIONS



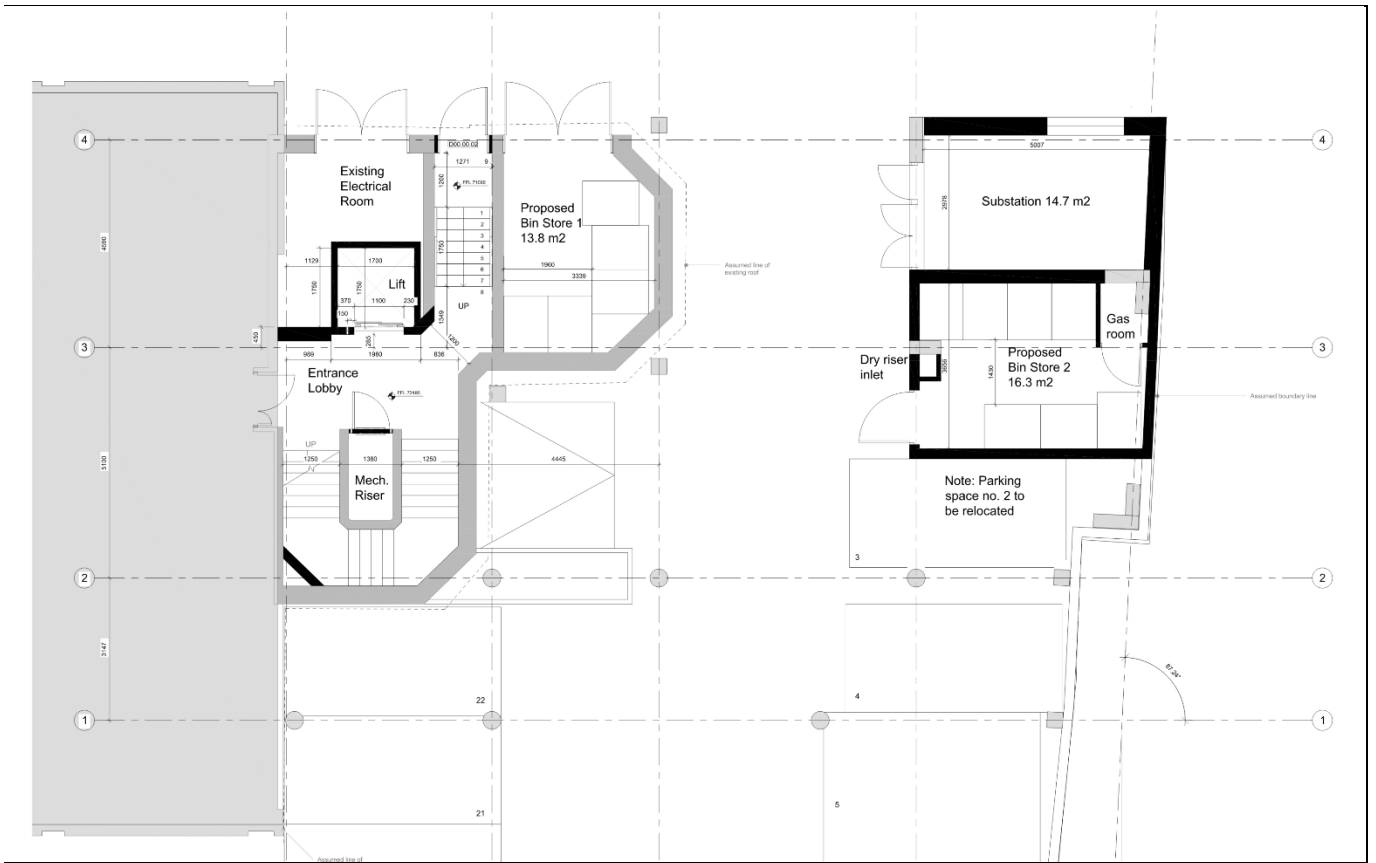
Existing & Proposed Parking Layout



Originally Approved Wate & Substation Layout



Previously Approved Wate & Substation Layout



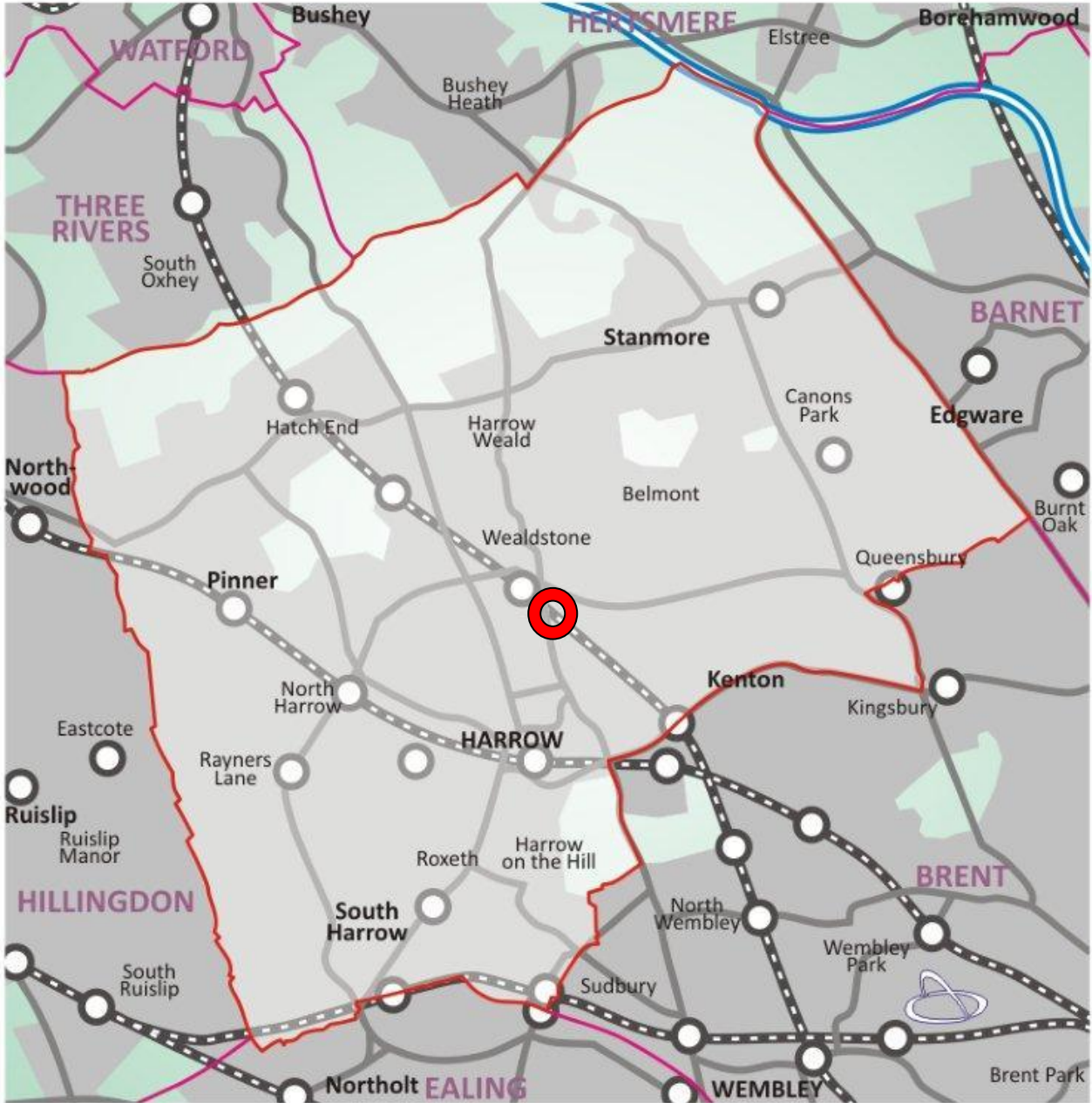
Proposed Ground Floor Plan



Proposed Elevations

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 = application site



10 Christchurch Avenue	P/2799/20
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10 Christchurch Avenue, Harrow, HA3 8NE



LONDON BOROUGH OF HARROW

PLANNING COMMITTEE

20th January 2021

APPLICATION NUMBER: P/2631/20
VALID DATE: 22ND OCTOBER 2020
LOCATION: 10 CHRISTCHURCH AVENUE HARROW
WARD: KENTON WEST
POSTCODE: HA3 8NE
APPLICANT: MR MEHRAN VAEZI
AGENT: MR MICHAEL UBAKA
CASE OFFICER: FAYE MCELWAIN
EXPIRY DATE: 14TH DECEMBER 2020

PROPOSAL

Conversion Of Dwelling (Use Class C3) Into Children's Care Home (Use Class C2);
Conversion Of Garage Into Habitable Room; External Alterations

The Planning Committee is asked to:

RECOMMENDATION

- 1) Agree the reasons for approval as set out in this report, and
- 2) Grant planning permission subject to the conditions set out in Appendix 1 of this report.

REASON FOR THE RECOMMENDATION

The proposal would accommodate a specialised need in the borough and surrounding area and would have an acceptable impact on the character of the area and the residential amenities of neighbours. As such the proposal would accord with the National Planning Policy Framework (NPPF) (2019), Policies 7.4B and 7.6B of the London Plan (2016), Policies D1 and D4 of the Draft London Plan Intend to Publish Version (20(19), Policy CS1.B of the Harrow Core Strategy (2012), Policies DM1 and DM29 of the Harrow Development Management Policies Plan (2013) and the Harrow Supplementary Planning Document: Residential Design Guide (2010).

INFORMATION

This application is reported to Planning Committee at the request of a nominated member to ensure the change of use is suitable. Due to an administrative error the report for this case was not published on the agenda for the December committee and therefore the determination of this application has been deferred to this committee.

Statutory Return Type:	Minor Development
Council Interest:	None
Net Floorspace:	0
GLA Community Infrastructure Levy (CIL) Contribution	N/a
Local CIL requirement (provisional):	N/a

HUMAN RIGHTS ACT

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

EQUALITIES

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

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

S17 Crime & Disorder Act

Policies 7.3.B and 7.13.B of The London Plan and Policy DM1 of the Development Management Policies Local Plan require all new developments to have regard to safety and the measures to reduce crime in the design of development proposal. It is considered that the development does not adversely affect crime risk. However, a condition has been recommended for evidence of certification of Secure by Design Accreditation for the development to be submitted to and approved in writing by the Local Planning Authority before any part of the development is occupied or used.

1.0 SITE DESCRIPTION

- 1.1 The site consists of a detached two storey dwelling on the north side of Christchurch Avenue on a corner plot on the junction between Christchurch Avenue and Larkfield Avenue.
- 1.2 The dwelling is characterised by a hipped roof and front gable projection on its front elevation and features an original side garage.
- 1.3 The property has recently been extended by virtue of a single storey rear extension.

2.0 PROPOSAL

- 2.1 Change the use of the dwelling to a Class C2 care home to house up to three children who are in need of adult supervision and care where their parent or long term guardian cannot currently provide it.
- 2.2 The children would be within the age range of eleven to sixteen.
- 2.3 At any one time there would be two to three members of staff providing the supervision.
- 2.4 The proposal also involves the conversion of the existing garage to a habitable room and the removal of the garage door and insertion of a window on the front elevation.

3.0 RELEVANT PLANNING HISTORY

- 3.1 A summary of the relevant planning application history is set out in the table below:

Ref no.	Description	Status and date of decision
P/0551/19	Single Storey Rear Extension; Removal Of Door And Insertion Of Window In Ground Floor Side Elevation	Granted – 07/05/2020
P/3988/19	Single Storey Rear Extension	Granted - 08/11/2019
P/0269/18	Conversion of dwellinghouse into six flats; Alterations to roof to form end gable, rear dormer, insertion of rooflight in front roofslope and window in side; Two storey side and rear extension; External alterations;	Refused - 06/04/2018

Landscaping and parking; Two vehicle accesses from Larkfield Avenue; Refuse and Cycle storage	
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Reasons For Refusal:

1. The proposal, by reason of the siting of a new residential unit on a private residential garden, is at odds with the spatial strategy for the Borough and would harm the contribution that gardens make to the character of the area, contrary to the National Planning Policy Framework (2012), Policy 3.5A of The London Plan (2016), Core Policies CS1.A and CS1.B of the Harrow Core Strategy (2012) and the adopted Supplementary Planning Document - Garden Land Development (2013).

2. The proposal, by reason of its excessive scale, mass, bulk and poor design, and its location on a prominent corner site and the siting of the two storey side extension adjacent to the side boundary/public foot path, would give rise to an incongruous, obtrusive, dominant and contrived form of development, that would result in a loss of openness at the side of the subject property, and detract from the character, massing, composition and pattern of development in the locality, to the detriment of the character and appearance of the subject property, the adjoining properties and the streetscene, contrary to the high quality design aspirations of the National Planning Policy Framework (2012), Policies 7.4 B and 7.6 B of The London Plan (2016), Core Policy CS1(B) of the Harrow Core Strategy (2012), Policy DM 1 of the Harrow Development Management Policies Local Plan (2013) and the adopted Supplementary Planning Document - Residential Design Guide (2010).

3. The proposed unit 6, by reason of its inadequate gross internal floor area, would give rise to a cramped, substandard and poor quality accommodation, to the detriment of the residential amenities of the future occupiers of the maisonette, contrary to Policies 3.5C, 3.8B, 7.1C, 7.2C and 7.6B of The London Plan (2016), Mayor of London - Housing Supplementary Planning Guidance, March (2016), Core Policy CS1.K of the Harrow Core Strategy (2012), Policies DM1 and DM26 of the Harrow Development Management Policies Local Plan (2013) and the adopted Supplementary Planning Documents Residential Design Guide (2010).

4. The proposed units 1 and 4, by reason of the unsatisfactory siting of the windows serving the kitchen and the bedroom respectively, and the potential use of the surrounding footpath by the future occupiers of the proposed flats and their visitors, would result in an oppressive outlook from unit 4 bedroom, inadequate daylight and loss of privacy to the ground floor units. As such, the proposed development will not provide a sustainable and good quality living accommodation for its future occupiers. The proposed development is therefore contrary to the National Planning Policy Framework (2012), Policies 3.5C, 3.8B, and 7.6B of The London Plan (2016), Policies DM1 and DM26 of the Harrow Development Management Policies Local Plan (2013), the Mayor of London's Housing Supplementary Planning Guidance (2016) and the adopted Supplementary Planning Document Residential Design Guide (2010).

P/2581/18	Conversion of dwellinghouse into four flats; Alterations to roof; Two storey side and rear extension; External alterations; Landscaping and parking; Two vehicle accesses from Larkfield Avenue; Refuse and Cycle storage.	Refused - 20/03/2018
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Reasons For Refusal

1. The proposal, by reason of the siting of a new residential unit on a private residential garden, is at odds with the spatial strategy for the Borough and would harm the contribution that gardens make to the character of the area, contrary to the National Planning Policy Framework (2018), Policy 3.5A of The London Plan (2016), Core Policies CS1.A and CS1.B of the Harrow Core Strategy (2012) and the adopted Supplementary Planning Document - Garden Land Development (2013).
2. The proposal, by reason of its location on a prominent corner site and the siting of the two storey side extension adjacent to the side boundary and poor design, would give rise to an obtrusive and dominant form of development, that would result in a loss of openness at the prominent corner plot, and detract from the character and pattern of development in the locality, to the detriment of the character and appearance of the subject property and the streetscene, contrary to the high quality design aspirations of the National Planning Policy Framework (2018), Policies 7.4 B and 7.6 B of The London Plan (2016), Core Policy CS1(B) of the Harrow Core Strategy (2012), Policy DM 1 of the Harrow Development Management Policies Local Plan (2013) and the adopted Supplementary Planning Document - Residential Design Guide (2010).
- 3.

P/5353/18	Certificate of lawful development (proposed): Alterations to roof to form end gable; installation of two rooflights in front roofslope and new window in side; conversion of garage to habitable room; single and two storey side extension; single and two storey rear extension	Refused - 07/02/2019.
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Reasons for Refusal

- 1 The proposed single and two storey rear extension would be within 2 metres of the boundary of the curtilage of the dwellinghouse, and the height of the eaves of the enlarged part would exceed 3 metres and is therefore not within the tolerances of Schedule 2, Part 1 Class A(i) of The Town and Country Planning (General Permitted Development) (England) Order 2015 as amended
- 2 The proposed two storey side extension would have a width greater than half the width of the original dwellinghouse, exceeds 4 metres in height and have more than a single storey and is therefore not within the tolerances of Schedule 2, Part 1 Class A(j) (i), (ii) and

(iii,) and (ja) of The Town and Country Planning (General Permitted Development) (England) Order 2015 as amended.

3 The proposed two storey rear extension extends beyond the rear wall of the original dwellinghouse by more than 4 metres and would have more than a single storey, and is therefore not within the tolerances of Schedule 2, Part 1 Class A (f) (i) and (ii) of The Town and Country Planning (General Permitted Development) (England) Order 2015 as amended.

4 The proposed roof alteration to combined exceed the maximum 50m³ therefore proposal fails to be within the tolerances of permitted development of Schedule 2, Part 1 Class B of The Town and Country Planning (General Permitted Development) (England) Order 2015 as amended.

5 The proposed alterations to the roof (plan ref: 107/04/04A and supporting document), show no reference to materials to match the construction of the exterior of the existing dwellinghouse and is therefore not within the tolerances of Schedule 2, Part 1 Class B.2 (a) of The Town and Country Planning (General Permitted Development) (England) Order 2015 as amended

6 The proposal is NOT therefore a lawful development

4.0 CONSULTATION

4.1 The two adjoining properties were consulted. The consultation period expires on 19th November 2020.

4.2 To date no objections have been received from adjoining residents.

4.3 Statutory and Non Statutory Consultation

4.4 The following consultations have been undertaken:

Highways -

The proposed level of cycle parking at six spaces exceeds the minimum required by the Intend to Publish London Plan standards (one long stay, one short stay). Following the submission of further detail, the proposed semi-vertical bicycle stands are appropriate for staff and visitors and the existing secure shed in the rear garden is suitable for residents.

This proposal is unlikely to result in a severe or harmful impact for the surrounding highway network; Highways have no objection.

5.0 POLICIES

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

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

5.2 In this instance, the Development Plan comprises The London Plan 2016, The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan (AAP) 2013, the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan SALP 2013 [SALP].

5.3 While this application has been considered against the adopted London Plan (2016) policies, significant regard has also been given to policies in the Publication London Plan (2020), as this will replace the current London Plan (2016) when published and form part of the development plan for the Borough.

5.4 The Publication London Plan was originally published in draft form in December 2017 and subject to Examination in Public (EiP) with the Panel’s report received in October 2019. The Secretary of State issued two sets of directions on policies in the subsequent London Plan (Intend to Publish Version) (2019). The Mayor of London has accepted the Secretary of State directions and has now sent the Publication London Plan (2020) to the Secretary of State for final approval to publish. As such, the entire Plan can be given significant weight. The Secretary of State has until the 1st February 2021 to either agree the Plan or issue further directives. Should the Publication London Plan (2020) be agreed by the Secretary of State, the Mayor of London will be in a position to publish it, thereby superseding the London Plan (2016) and giving it full weight as part of the Council’s development plan

5.5 The Publication London Plan (2020) is a material planning consideration that holds significant weight in determining planning applications, with relevant policies referenced within the report below and a summary within Informative 1.

6.0 ASSESSMENT

6.1 The main issues are;

- Principle of the Development
- Design, Character and Appearance of the Area
- Residential Amenity
- Traffic, Safety and Parking
- Development and Flooding
- Development and

6.2 Principle of Development

6.2.1 The relevant policies are:

- National Planning Policy Framework (2019)
- Harrow Core Strategy (2012): CS1
- Harrow Development Management Policies Local Plan (2013): DM1, DM29

6.2.2 The home is proposed to provide residential care to three children and up to three members of staff would be in the premises at one time. Depending on the care needs of the various children a change of use may not be necessary as there is a permitted change to C3(b) which allows for not more than six residents living together as a single household where care is provided for residents. The applicant was advised at pre-application stage that as the specific care needs of each child is not known that a change of use to C2 would cover every eventuality. Notwithstanding this the fall back position, in that this property could be used as a care home for up to six persons is a material consideration, that strongly supports the case for the proposal.

6.2.3 The Council's policy supports proposals for care homes for vulnerable people provided that the site is accessible by public transport, with good access to local amenities including shops and community facilities.

6.2.4 Although the closest shops are located approximately 1 mile away in Wealdstone, given that the proposal is for vulnerable children, it is likely that groceries and other purchased items would be delivered to the occupiers. This distance is therefore acceptable in this case.

6.2.5 The property benefits from a large garden and the site is well positioned in terms of play facilities for the residents. In particular, Byron Park is in close proximity.

6.2.6 The change of use results in a loss of a single family home from the boroughs housing stock, which in most cases would be resisted under the London Plan (2016). However, in this instance, the change of use still provides a type of residential accommodation and accordingly is considered appropriate.

6.2.7 As such the proposed change of use is considered to be acceptable in accordance with the relevant policies.

6.3 Design, Character and Appearance of the Area

6.3.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan 2016: 7.4, 7.6
- The Draft London Plan 2019: D1, D2,
- Harrow Core Strategy 2012: CS1
- Harrow Development Management Policies Local Plan (2013): DM1

Relevant Supplementary Documents

- Residential Design Guide (2010)

- 6.3.2 Whilst the property would not be in use strictly as a single family home, its appearance would remain the same and the character as a single family home would be retained. There are not proposed to be any signage or anything else which would identify the building as anything but a dwelling house. Moreover, the change of use continues to provide a residential use within a residential area. Accordingly, it is considered that the change of use results in a development that would not have any impact on the residential character of the surrounding area.
- 6.3.4 The proposal includes the conversion of the garage and the addition of a window in place of the garage door on the front elevation. The alteration is considered to be in keeping with the character of the dwelling and the streetscene and raises no significant design concerns.
- 6.3.5 As such, the impact on the character and appearance of the existing building and the surrounding area is considered to be acceptable and in accordance with the relevant policies.

6.4 Residential Amenity

- 6.4.1 The relevant policies are:
- National Planning Policy Framework (2019)
 - The Draft London Plan 2019: D1, D2,
 - Harrow Core Strategy 2012: CS1
 - Harrow Development Management Policies Local Plan (2013): DM1, DM29
- 6.4.2 Other than the conversion of the garage, it is not proposed to make any physical alterations or enlargements to the application property, and as such there would be no harm to the neighbouring occupiers through any loss of light or outlook.
- 6.4.3 In terms of the potential for the proposed scheme to harm neighbouring amenity through noise and disturbance, the supporting evidence would suggest that the activity associated with the use would not be over and above what would be expected in a normal residential dwellinghouse.
- 6.4.4 There is proposed to be no more than three children aged between 11 and 16 residing in the property at any one time and two to three staff on duty at any one time making a maximum of six occupants in the dwelling. This is comparable to a family unit that may occupy the building if it were to remain as a dwelling. It is important to note that the children would be at school for most of the day during term time, just as would be the case with children in a family dwelling house. Although it is appreciated that there may be visitors to the premises and potentially doctors or therapists, the amount of movement is unlikely to be significantly above what is commonplace in a residential setting. A condition has been added to ensure that the number of children residing in the premises would not exceed the maximum of three to control the potential level of disruption.

- 6.4.5 It is noted that the children would have specific care needs. However, it is not considered that this is likely to significantly impact on the amenity of the occupiers of neighbouring properties. Each child is understood to have a specific care package suited to their needs and with 24 hour staffing presence, it is considered unlikely that this would cause significant noise or disruption to the occupiers of neighbouring properties.
- 6.4.6 The proposal would therefore have acceptable impact on the amenity of the occupiers of neighbouring properties and would accord with the relevant policies.
- 6.4.7 In terms of the future occupiers, the house is well equipped. The bedrooms are of a generous size of 12 to 15 sqm. There is a separate living, dining, computer room, kitchen and bathroom, separate toilet plus an office for the members of staff. Therefore, the building is suitable to provide for a normal living experience for the vulnerable children that would reside in the property.
- 6.4.8 The premises will be run by experienced staff to include, a manager, deputy manager, senior care workers and support and waking staff with at least two members on duty at any time. The staff will administer specific care packages tailored to meet the specific needs of the children and will provide a stable environment until it is deemed suitable by Social Services to return to their own home. The care home aims to provide therapeutic care and a safe and stable, educational environment for its residents who are currently in need of such support.
- 6.4.9 It is therefore considered that the proposal would provide a safe and homely environment for the future residents and would fulfil a specific need in the Borough and is in compliance with the relevant policies.

6.6 Traffic, Safety and Parking

6.6.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan 2016: 6.3, 6.9, 6.13
- The Draft London Plan 2019: T4, T5, T6;
- Harrow Core Strategy 2012: CS1
- Harrow Development Management Policies Local Plan (2013): DM1, DM42,

6.6.2 The site is located in an area with a public transport accessibility level of 2 which is predicted to increase to 3 by 2021. There are regular, frequent buses passing the property and nearby. To the east is Queensbury Circle where there are various retail businesses and restaurants and to the west is Wealdstone town centre where there are more shops and an excellent public transport provision. It is considered that the volume of visitors would not be significantly above that of a single family dwellinghouse and there is no objection from the Council's Highway Officer.

- 6.6.3 Cycle parking for staff and the children is proposed on site in addition to the provision of travel cards which is supported in terms of sustainable travel. A condition has been added to ensure that suitable cycle stands are provided in line with Highway comments.
- 6.6.4 As with other properties in the vicinity of the site the refuse bins are stored on the frontage of the property. There is not likely to be significantly more refuse than with the existing use and the current arrangement is acceptable.
- 6.6.5 The proposal is considered to be in acceptable in terms of transport implications in accordance with the relevant policies.

6.7 Development and Flooding

- 6.7.1 The access to the site is within Flood Zone 2 and 3. No extensions or additions are proposed and therefore there would not be an increase in flood risk as a result of the development. The supporting information lists emergency planning procedures given the potential vulnerability of the users.

6.8 Crime and Development

- 6.8.1 Given the nature of the proposed use, and the potential for vulnerable residents to be on site there is a potential for security concerns. The supporting document points out that there will be staff for 24 hours a day and the property will be secured with CCTV and access controlled doors. It is therefore considered that the proposal does not pose a security risk. A secure by design condition is recommended.

7.0 CONCLUSION AND REASONS FOR APPROVAL

- 7.1 The proposed development would not unduly impact on the character of the area or the amenities of the residential occupiers of the adjoining, or nearby properties, subject to the attached conditions. The proposed development would therefore accord Policy CS1 of the Harrow Core Strategy 2012, Policies 7.4 and 7.6 of the London Plan (2016) and policies DM1 ???of the Harrow Development Management Policies Local Plan (2013).

APPENDIX 1: Conditions and Informatives

Conditions

1. Full Time

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

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

2. Approved Plans:

The the development hereby permitted shall be carried out, completed and retained in accordance with the following approved plans and documents:

Site Location Plan; SDC-04-A; SDC-05-A; SDC-100; SDC-101-A; SDC-102; SDC-103; SDC-104; SDC-105; Email from agent dated 24/11/2020.

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

3. Number of Occupiers

The number of children who reside at the premises shall not exceed three at any given time and the number of staff who assist the children shall not exceed three at any given time.

REASON: To safeguard the amenity of neighbouring residents.

4. Secure by Design

Prior to the first occupation of the development, evidence of Secured by Design Certification shall be submitted to the Local Planning Authority to be agreed in writing, or justification shall be submitted where the accreditation requirements cannot be met. Secure by design measures shall be implemented and the development shall be retained in accordance with the approved details.

REASON: In the interests of creating safer and more sustainable communities and to safeguard amenity by reducing the risk of crime and the fear of crime.

Informatives

1. The following policies are relevant to this decision:

National Planning Policy Framework (2019)

The London Plan (2016):

- 3.3 Increasing Housing Supply
- 3.5C: Quality and design of housing developments
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.13 Parking
- 7.3B Designing out crime
- 7.4B Local character
- 7.6B Architecture

The Publication London Plan (2020):

- D1 London's form, characteristic and capacity for growth
- D3 Optimising site capacity by the design led approach
- D4 Delivering Good Design
- T5 Cycling
- T6 Car parking

Harrow Core Strategy (2012):

- Core policy CS1.B
- Core policy CS1.D
- Core Policy CS1 K
- Core policy CS1.W

Harrow Development Management Policies Local Plan (2013):

- DM1: Achieving a High Standard of Development
- DM2: Achieving Lifetime Neighbourhoods
- DM10: On Site Water Management and Surface Water Attenuation
- DM 24: Housing Mix
- DM 26 Conversion of Houses and Other Residential Premises
- DM27: Amenity space
- DM29: Sheltered Housing, Care Homes and Extra Care Housing
- DM 42: Parking Standards
- DM45: Waste Management

Supplementary Planning Documents:

- Supplementary Planning Document Residential Design Guide (2010)
- Technical housing standards - nationally described space standard (2015).
- Major of London Housing SPG (2016)

2. Pre-application engagement

Statement under Article 35(2) of The Town and Country Planning (Development Management Procedures) (England) Order 2015

This decision has been taken in accordance with paragraphs 187-189 of The National Planning Policy Framework. Pre-application advice was sought and provided and the submitted application was in accordance with that advice.

Major of London Housing SPG (2016)

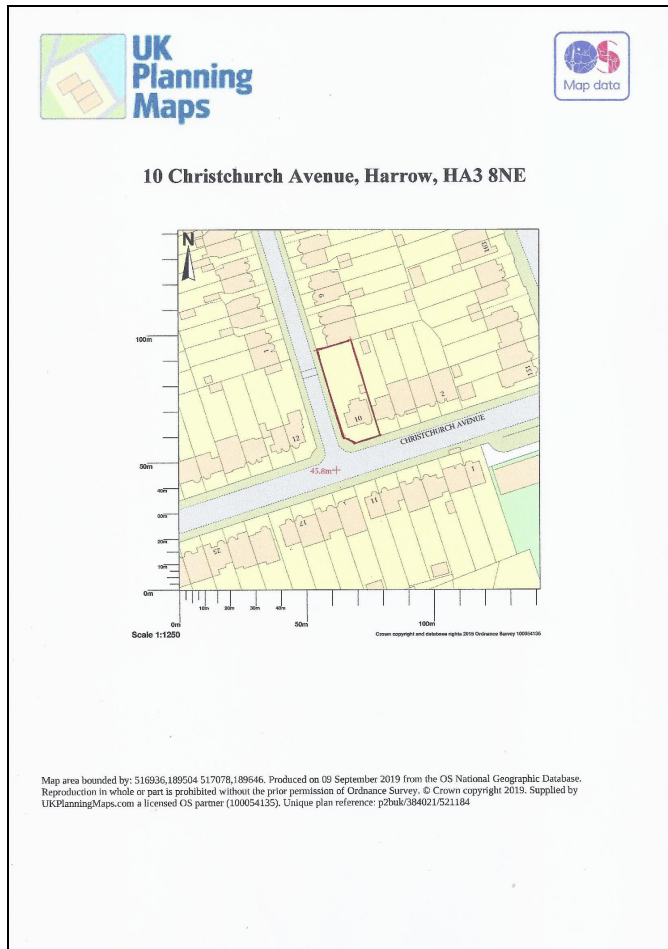
3 Designing Out Crime

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

Checked

Interim Chief Planning Officer	Orla Murphy pp Beverley Kuchar 7.1.2021
Corporate Director	Paul Walker 7.1.2021

APPENDIX 2: SITE PLAN



APPENDIX 3: SITE PHOTOS



Front elevation



Side Elevation



Rear elevation

