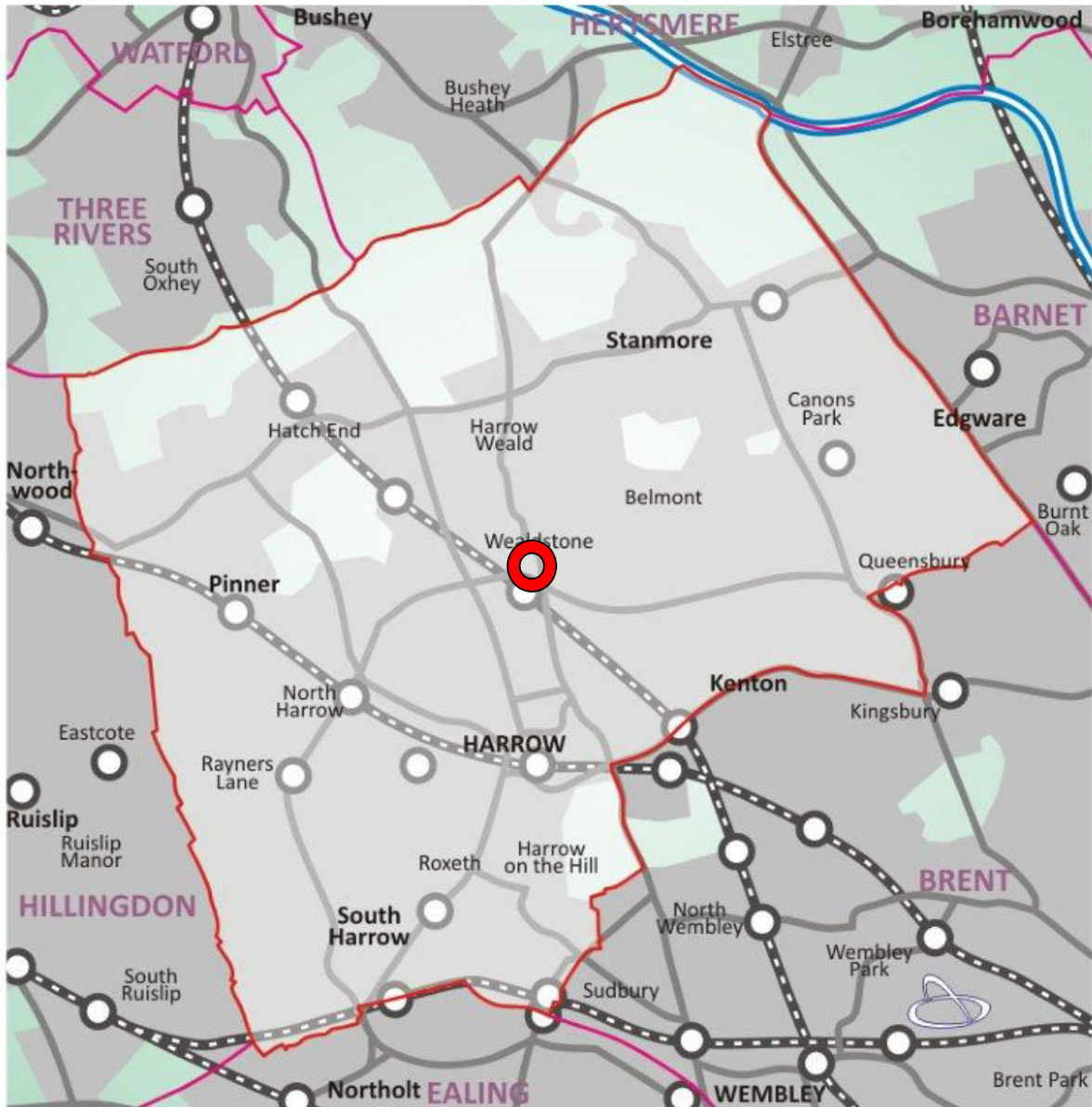
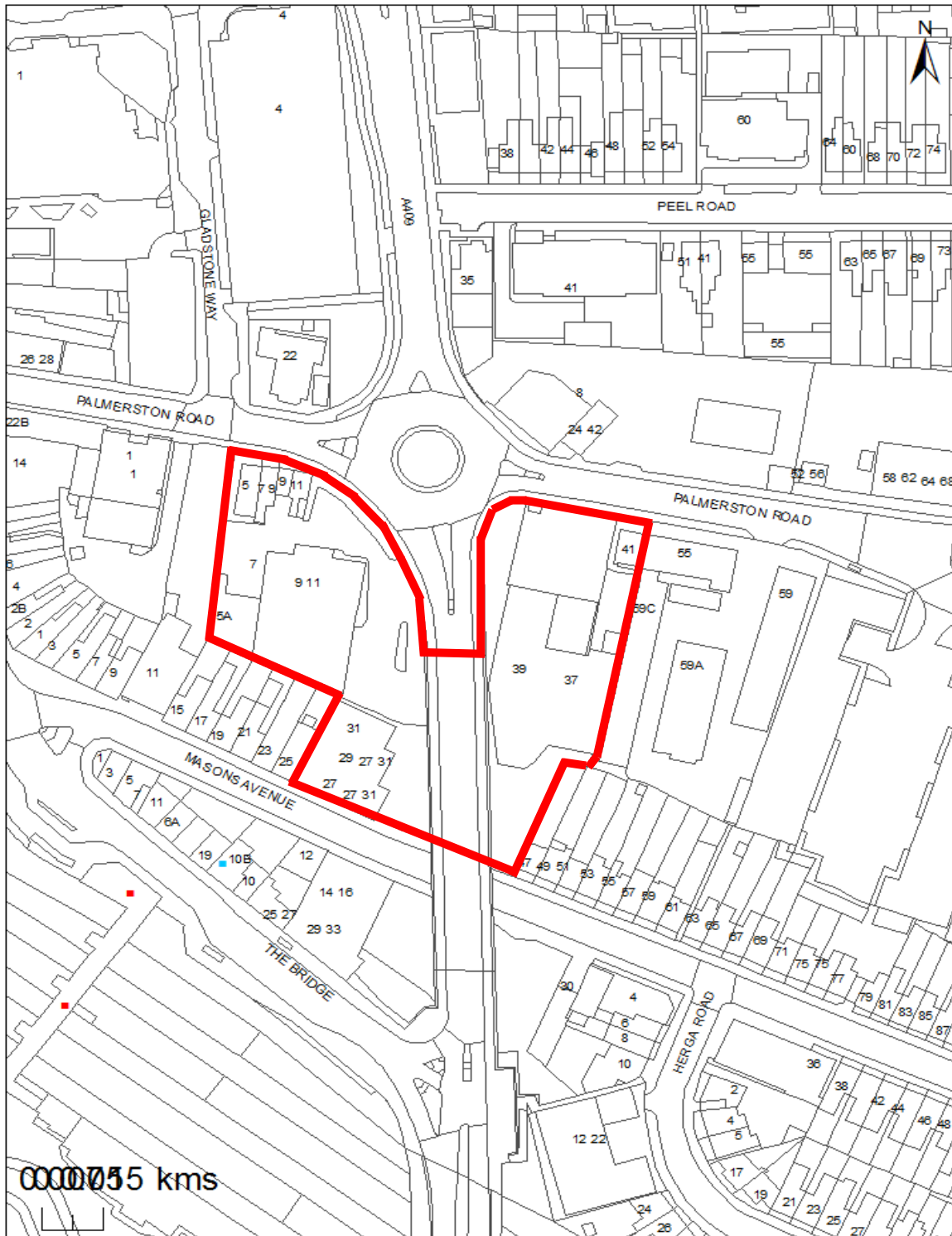


 = application site



**5-11 and 37-41 Palmerston Road and 27-33 Masons Avenue and Land Adjacent to 47 Masons Avenue, Harrow**

**P/1619/16**



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**5-11 and 37-41 Palmerston Road and 27-33 Masons Avenue and Land Adjacent to 47 Masons Avenue, Harrow** **P/1619/16**

## LONDON BOROUGH OF HARROW

### PLANNING COMMITTEE

16<sup>th</sup> November 2016

**Application Number:** P/1619/16  
**Validation Date:** 17<sup>th</sup> May 2016  
**Location:** 5–11 and 37-41 Palmerston Road and 27-33 Masons Avenue and Land Adjacent to 47 Masons Avenue, Harrow  
**Ward:** Marlborough  
**Post Code:** HA3 7RR  
**Applicant:** Origin Housing Ltd  
**Agent:** Savills  
**Case officer:** Olive Slattery  
**Expiry date** 30<sup>th</sup> September 2016

#### PURPOSE OF REPORT/PROPOSAL

The purpose of this report is to set out the Officer recommendations to The Planning Committee regarding an application for planning permission relating to the following proposal:

Redevelopment of the site to provide 186 residential units (Use Class C3); 1165sqm office floorspace (Use Class B1) and 695sqm flexible commercial and community floorspace (Use Classes A1, B1, D1, D2) in buildings between 1 and 17 storeys in height; Basement to provide carparking and cycle parking spaces; One vehicle access from Palmerston Road and one vehicle access from Masons Avenue; Refuse storage; Entrance gates; Public realm and landscaping; Photo-voltaic panels; Demolition of existing buildings.

#### RECOMMENDATION

The Planning Committee is asked to:

- 1) agree the reasons for approval and the conditions as set out 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 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 Divisional Director of Regeneration, Enterprise and Planning in consultation with the Director of Legal and Governance Services for the continued negotiation and completion of the Section 106 legal agreement 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:

### **Affordable Housing and Wheelchair Homes**

- A minimum of 74 homes on the site to be provided as affordable homes in accordance with a schedule of accommodation (to include details of tenure and mix) to be approved in writing by the Council prior to the commencement of the development.
- A review mechanism (to be agreed) to 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 enable any additional affordable homes to be provided on-site, in the first instance, otherwise as a cash in-lieu sum for off-site provision.
- A financial contribution (£90,000) to be paid by the developer to the Council to fund off-site affordable housing
- 10% of affordable rented homes to be constructed as wheelchair homes and ready immediately upon completion for occupation by a wheelchair user

### **Design Review and Design Code**

- The developer undertakes to use all reasonable endeavours to retain an appropriate level of architectural input during the construction of the entire scheme or the developer to submit a Design Code to the Council prior to the commencement of development. The Design Code shall detail the quality of the external materials of the finished development and other design parameters.
- The agreement of a Design Code to have certainty over the exact external materials to be used throughout the development

### **Employment and Training**

- A financial contribution to be paid by the developer to fund local employment and training programmes.
- The developer to use all reasonable endeavours to secure the use of local suppliers and apprentices during the construction of the development.
- The developer to submit to the Council for approval, prior to commencement of the development, a Training and Recruitment Plan. The developer to implement the agreed Plan.
- Prior to the commencement of the development, the developer shall submit an Employment Management Plan to the Council for written approval. The Employment Management Plan shall include information on how the building itself will be managed (see (i) below) and what services etc will be offered to

the occupants/businesses (see (ii) below). The developer shall implement the agreed Employment Management Plan.

### **Decentralised Energy Networks**

- The developer to use all reasonable endeavours to ensure that the on-site energy centre is laid out with sufficient space to allow expansion and technical feasibility of CHP scheme to also serve any future redevelopment of the AAP site 6 (the site allocation in the adopted Local Plan) currently known as Palmerston Road / George Grange Way and other adjacent development sites
- The developer to safeguard a route to be agreed with the Council to allow expansion and technical feasibility of the CHP scheme to also serve any future redevelopment of the AAP site 6 (the site allocation in the adopted Local Plan) currently known as Palmerston Road / George Grange Way, and to enable a connection to any future district decentralised energy network
- In the event of any proposed future district decentralised energy network, the developer to use all reasonable endeavours to agree terms pursuant to a connection between the site-wide heat network and the district decentralised energy network. A route within the scheme shall be safeguarded to enable future connection of the site-wide network to any district decentralised energy network.
- A route shall be safeguarded within the vicinity of the George Grange Way and Masons Avenue to enable the future passage across the site of the distribution network associated with any future district decentralised energy network. Such passage shall not be unreasonably refused nor subject to unreasonable costs.

### **Transport and Highways**

- The developer to enter into a Section 278 agreement to provide a raised table at the entrance to the basement. A £1,000 contribution is required for order-making.
- The developer to enter into a Section 278 agreement to provide two inset parking bays on Palmerston Road and Masons Avenue a car club bay on Masons Avenue. A £2,000 contribution is required for order-making
- New cycle and pedestrian facilities – A £10,000 contribution is required for Legible London wayfinding signs around the site (3 finger posts and 1 monolith).
- 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.

- The developer to make reasonable endeavours throughout the life of the development to secure a car-club operator to provide a vehicle for that space
- A revised Travel Plan to be submitted to the Council prior to the first occupation of the building. A travel plan bond of £5,000 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.

### **Maintenance of the Flyover**

- The Council Engineer or its appointed contractor shall be afforded unrestricted access to undertake periodic bridge structure condition inspections.
- The Council's appointed contractor shall be afforded unrestricted access to undertake any maintenance works to the bridge structure deemed necessary by the Council's Engineer.
- Should any inspection or maintenance works require the removal of the proposed structure (The Hub), the developer must arrange for its removal within the timeframe specified by the Council Engineer. The Council will have the right to remove or partially remove the proposed structure to undertake required works should the property owner fail to cooperate.
- No part of the proposed structure shall break the surface of the bridge structure
- No attachments shall be made to the bridge structure without the permission of the Council Engineer

### **Floodrisk**

- The developer to submit a maintenance strategy to ensure the void space (underneath Block D) remains clear for the lifetime of development to ensure flood flowpaths are not obstructed.

### **Children and Young People's Play Space**

- A financial contribution (£15,000) to be paid by the developer to the Council to fund off-site provision (including enhancements to existing provision where appropriate) of play space and equipment appropriate for 5 - 15 year olds.

### **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 agreed) to be paid to reimburse the Council's administrative costs associated with monitoring compliance with the obligation terms.

## **RECOMMENDATION B**

That if the Section 106 Agreement is not completed by 16th February 2016, or as such extended period as may be agreed by the Divisional Director of Regeneration, Enterprise and Planning in consultation with the Chair of the Planning Committee, then it is recommended to delegate the decision to **REFUSE** planning permission to the Divisional Director of Regeneration, Enterprise and Planning 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 (2012), policies 3.11, 3.13, 5.6, 5.12, 6.3, 7.4, 7.5, 7.6 and 7.7 of The London Plan (2016), Core Strategy (2012) policy CS1, policies DM 1, DM 2, DM 9, DM 13, DM 28, DM 42, DM 43 and DM 50 of the Harrow Development Management Policies Local Plan, policies AAP3, AAP4, AAP9, AAP10, AAP13, AAP15, AAP19 and AAP20 of the Harrow and Wealdstone Area Action Plan (2013) and the Supplementary Planning Document: Planning Obligations (2013).

## **REASON FOR THE RECOMMENDATIONS**

The application site is located within the Harrow & Wealdstone Opportunity Area, and is an allocated site in the Harrow and Wealdstone Area Action Plan (AAP site 6). The proposal represents a departure from the development plan, insofar as (i) the proposal is for a residential led scheme and the balance of the proposed uses is not in accordance with the AAP parameters; (ii) the proposed building height (17 storeys) would exceed the building height suggested within the AAP (6 storeys). However, it is concluded that compelling other material considerations exist to point to a decision other than in accordance with the Local Plan. In particular,

- The proposal would deliver 'landmark buildings' with high quality public realm on adjacent sites within the Heart of Harrow (an Opportunity Area and a Housing Zone). The development has been tested against the full rigour of development plan policy for tall buildings and has been found to comply. Protected views would not be adversely affected. Various experts in the design field have considered the scheme and have not raised any objection, subject to appropriately worded planning conditions. Officers are mindful of this expert advice and consider that the proposed tall buildings would be visually interesting and would represent gateway buildings to Wealdstone. The proposed public realm would not only assist to sustain the development itself but would provide new, high quality, inclusive and legible routes in Wealdstone District Centre. This in turn would assist to increase permeability within the District Centre and strengthen the spatial definition of this part of Wealdstone, as required by the site allocation.

- The proposal would deliver high quality housing with a high percentage of affordable units (40%). The submitted Financial Viability Assessment has been robustly tested and shows that the scheme would deliver the 'maximum reasonable amount' of affordable housing, subject to the recommended obligations. It is considered that the current proposal would make a valuable contribution towards the delivery of target housing outputs including affordable housing units for the Heart of Harrow Opportunity Area, a designated Housing Zone. Furthermore, the application has demonstrated both qualitative and quantitative improvements in employment floorspace, and it is considered that the employment uses proposed on the application site would provide for a 'strong business community' within Wealdstone.

- The proposal would deliver a scheme that would greatly assist towards the regeneration of Wealdstone district centre, which is known to be currently under-performing. It is considered that the proposal will provide a high quality development and much needed physical renewal of the site. It is anticipated that the mere fact of redevelopment would improve perceptions of the district centre and confidence in the strength of the local economy. It is envisaged that the proposal will therefore assist to improve economic performance and quality of life in this locality, helping Wealdstone to achieve its full potential.

The concerns of residents, amenity associations and neighbouring interests are all acknowledged. The above appraisal does identify impacts of the proposed development. In particular, the proposal will bring about a significant change in outlook for neighbouring occupiers. It is considered that such impacts are inevitable if necessary growth is to be delivered within one of London's opportunity areas. It is considered on balance that subject to a comprehensive schedule of planning obligations and planning conditions, set out within the recommendation that the proposal would not detrimentally impact upon the amenity of neighbouring occupiers.

Subject to the planning conditions and s106 obligations, it is considered that the transport impacts of the proposal in this highly sustainable location are acceptable and in this regard, the proposal would comply with the aims and objectives of the Development Plan.

A range of potential environmental effects have been appraised. The application shows that the proposal would incorporate measures that would help to adapt to/manage the impacts of climate change and identify areas where mitigations are required, including those needed to secure optimal living conditions for future occupiers and to safeguard the environment of surrounding occupiers during demolition and construction phases. These mitigations would be secured through a range of recommended conditions of planning permission. Infrastructure made necessary by the development is incorporated within the proposed Heads of Terms of a Planning Obligation to be entered into under section 106 of the Town and Country Planning Act. Contributions to general infrastructure requirements would be made under Harrow's Community Infrastructure Levy.

Overall, Officers consider that the proposal would make efficient use of this allocated, previously developed, highly accessible site and would replace rundown buildings with a high quality development. To this end, Officers conclude that the proposed development is worthy of support.



## **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: Largescale Major Development  
Council Interest: Yes, the southern-most part of the site, and small pockets of the northern part of the site are within the ownership of Harrow Council.

GLA Community Infrastructure Levy (CIL) Contribution (provisional): £574, 217  
Local CIL requirement: £2,051,480

## **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.

## **LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985 BACKGROUND PAPERS USED IN PREPARING THIS REPORT:**

- Planning Application
- Statutory Register of Planning Decisions
- Correspondence with Adjoining Occupiers
- Correspondence with Statutory Bodies
- Correspondence with other Council Departments
- National Planning Policy Framework
- London Plan
- Local Plan - Core Strategy, Development Management Policies, SPGs
- Other relevant guidance

## **LIST OF ENCLOSURES / APPENDICES:**

Officer Report:

Part 1: Planning Application Fact Sheet

Part 2: Officer Assessment

Appendix 1 – Conditions and Informatives

Appendix 2 – Site Plan

Appendix 3 – Site Photographs

Appendix 4 – Plans and Elevations

## OFFICER REPORT

### PART 1 : Planning Application Fact Sheet

The Site	
Address	5-11 and 37- 41 Palmerston Road and 27-33 Masons Avenue and Land Adjacent to 47 Masons Avenue, Harrow
Applicant	Origin Housing Limited
Ward	Marlborough
Local Plan allocation	Allocated Site AAP6
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
Flood Zone	The application site is located within EA flood zone 2 (medium probability of flooding) and 3 (high probability of flooding). The Harrow Strategic Flood Risk Assessment (SFRA) shows that part of the site lies within flood zone 3a and part of the site lies within flood zone 3b which forms part of the functional flood plain, defined as having a high probability of flooding.
Town Centre	The western park of the site is within Wealdstone District Centre.
Employment Land	The majority of the site is within a designated Industrial and Business Use Area
SSSI/Site of Importance for Nature Conservation	N/A
Area of Special Character	N/A
Historic Park and Garden	N/A
Archaeological Priority Area:	N/A

Housing		
Density	Proposed Density hr/ha	720
	Proposed Density u/ph	269
	PTAL	5 – 6a
	London Plan Density Range	200 – 700 u/ha or 70 – 260 hr/ha
Dwelling Mix	Studio (no. / %)	0
	1 bed (no. / %)	67 / 36%
	2 bed (no. / %)	112 / 60%
	3 bed (no. / %)	7 / 4%
	4 bed (no. / %)	0
	Overall % of Affordable Housing	40% by unit / 42% by habitable room
	Social Rent (no. / %)	28 / 15%

	Intermediate (no. / %)	46 / 25%
	Private (no. / %)	112 / 60%
	Commuted Sum	Yes
	Comply with London Housing SPG?	Yes
	Comply with M4(2) of Building Regulations?	Yes
	Comply with M4(3) of Building Regulations?	Yes

<b>Non-residential Uses</b>		
Existing Use(s)	Existing Use	Business and Industrial and Residential
	Existing Use Class(es)	B2 and B8 and C3
Proposed Use(s)	Proposed Use / Operator	Offices, commercial / community, residential
	Proposed Use Class(es) sqm	B1, flexible A1 /B1 / D1 / D2, C3
Employment	Existing number of jobs	31
	Proposed number of jobs	150

<b>Transportation</b>		
Car parking	No. Existing Car Parking spaces	60
	No. Proposed Car Parking spaces	69
	Proposed Parking Ratio	0.35 per flat
Cycle Parking	No. Existing Cycle Parking spaces	0
	No. Proposed Cycle Parking spaces	329
	Cycle Parking Ratio	1.7 per flat
Public Transport	PTAL Rating	5 – 6a
	Closest Rail Station / Distance (m)	Harrow & Wealdstone is less than 200m from the site
	Bus Routes	Local bus routes within the vicinity of the site include 140, 182, 186, 258, 340, H9, H10.
Parking Controls	Controlled Parking Zone?	Yes – zone CA
	CPZ Hours	Mon – Fri 10am to 11am and 2pm to 3pm
	Previous CPZ Consultation (if not in a CPZ)	N/A
	Other on-street controls within	Bus stops, double and

	the vicinity of the site	single yellow lines.
Refuse/Recycling Collection	Summary of proposed refuse/recycling strategy	Once weekly - Site caretaker to bring residential bins to collection point adjacent to Masons Avenue. Commercial waste by private arrangement.

<b>Sustainability / Energy</b>	
BREEAM Rating	N/A
Development complies with Part L 2013?	No
Renewable Energy Source / %	Lean – windows, thermal bridging etc / 7% Clean – CHP / 28% Green - Solar / 37%

## **PART 2 : Assessment**

### **1.0 SITE DESCRIPTION**

- 1.1 The 0.69 hectare site is located within the Harrow & Wealdstone Opportunity Area, and is an allocated site in the Harrow and Wealdstone Area Action Plan (AAP site 6).
- 1.2 The irregular shaped site comprises a parcel of land on the south-eastern and south-western corners of the roundabout, and the land beneath the George Gange Way flyover, which traverses and over-sails the site. It has a frontage on Masons Avenue, as well as Palmerston Road.
- 1.3 The western part of the site is within Wealdstone District Centre. It is not within the primary shopping area of this centre, and is therefore not within a primary or secondary parade.
- 1.4 The majority of the site is located within a designated Industrial and Business Use Area, the exception being the southern-most part of the site.
- 1.5 The site slopes from south to north, with the northern part of the site approximately 3m higher than the southern part of the site.
- 1.6 The parcel of land on the eastern side of the flyover is occupied by a detached dwellinghouse and workshop buildings which accommodate three distinct car-related uses: a car rental business, a car body shop and a car repair garage undertaking servicing and MOT testing of vehicles. The front of the site is a tarmacked car park.
- 1.7 The parcel of land on the western side of the flyover contains three dwellinghouses, vacant workshop buildings (B2 use), and two buildings used for commercial food manufacturing and catering business (B2 use).
- 1.8 There are three vehicular access to the application site; one to the west of the Palmerston Road / George Gange Way roundabout, one to the east of the Palmerston Road / George Gange Way roundabout and one at the south of the site from Masons Avenue.
- 1.9 The site is bounded to the west by a vehicular entrance to a servicing and parking area which serves Station House, 11-13 Masons Avenue. Beyond this lies Birchfield House, a five storey residential property.
- 1.10 Immediately south-west of the application site lies a terrace of two-storey commercial properties with residential use at upper floor levels.
- 1.11 The site is bounded to the east by a three-storey building which is occupied by a College of Business and Law, and a two-storey building containing business and industrial units.

- 1.12 A terrace of two-storey residential properties lie immediately south-east of the application site.
- 1.13 The site has a public transport accessibility (PTAL) rating of 5 to 6a.
- 1.14 The application site is located within EA flood zone 2 (medium probability of flooding) and 3 (high probability of flooding). The Harrow Strategic Flood Risk Assessment (SFRA) shows that part of the site lies within flood zone 3a and part of the site lies within flood zone 3b which forms part of the functional flood plain, defined as having a high probability of flooding.
- 1.15 The site lies within the wider setting consultation area of a number of views:
- the long range view from Roxborough Road Bridge towards Harrow Weald Ridge;
  - the long range view from Harrow Recreation Ground towards Harrow and Harrow on the Hill
- 1.16 There are no designated heritage assets on the application site. However, Harrow and Wealdstone Station and Wealdstone Police Station (both Grade II Listed Buildings) and 21 The Bridge (Locally Listed) are both within the vicinity of the site.

## **2.0 PROPOSED DETAILS**

- 2.1 Full planning permission is sought for the redevelopment of the application site to provide 186 residential units (use class C3); 1165sqm office floorspace (use class B1) and 695sqm flexible commercial and community floorspace (uses classes A1, B1, D1, D2) in buildings between one and seventeen storeys in height.
- 2.2 The buildings on the site would have different layouts, storey heights and designs.
- 2.3 **Building A** would be sited on the western-most part of the site and would front Palmerston Road. It would contain 17 flats and 36sqm of commercial / community floorspace (flexible A1, B1, D1, D2 use). The front part of this building would be 5 storeys high (16.25m to top of parapet with a further 0.6m lift overrun) and the rear part would be 2 storeys high (6.8m). The building would be 11.3m wide and 45.7m deep. A basement (providing car and cycle parking spaces) would be located below this building. Vehicular access to this basement would be provided at the front of this building, and would face towards Palmerston Road. The front elevation of building A would be set back between 1.6m and 2.5m from the front boundary of the site. It would be sited between 2m and 4m from the western site boundary, and between 4m and 7.1m from the southern site boundary. At ground floor level, a 7.8m gap is proposed between building A and the front block of building B. A 16m gap is proposed between building A and the rear block of building B.

- 2.4 **Building B** would be situated on the western side of the site, between the flyover and building A. It would comprise two adjoining blocks. The front block of this building would be 17 storeys high (54.65m) and the rear of this block would be 9 storeys high (30.2m). It would have a maximum width of 25.4m and a maximum depth of 40m. The building would contain 82 flats across all 17 floors (including the ground floor). Two separate commercial / community units (flexible A1, B1, D1, D2 use) are also proposed at ground floor level. The northern-most unit would have a floor area of 51.2sqm and the southern-most unit would have a floor area of 212.6sqm. Each of the proposed commercial units would have a double floor-to-ceiling height. 100 photovoltaic panels are proposed on the roof of the 17 storey high element. The north-eastern corner of the front block of building B would sit on the boundary with the pavement at the roundabout. The rear block would be sited between 3.5m and 9.3m from the flyover. A 14.6m gap is proposed between building B and D (the Hub).
- 2.5 **Building C** is situated on the eastern side of the flyover. It would also comprise two adjoining blocks. The front block of this building would be 15 storeys high (48.5m) and the rear block would be 10 storeys high (33.125m). It would have a maximum width of 25.5m and a maximum depth of 40.2m. The building would contain 80 flats across all 15 floors (including the ground floor). Two separate commercial / community units (flexible A1, B1, D1, D2 use) are also proposed at ground floor level. The northern-most unit would have a floor area of 54.3sqm and the southern-most unit would have a floor area of 212.6sqm. Each of the proposed commercial units would have a double floor-to-ceiling height. 100 photovoltaic panels are proposed on the roof of the 15 storey high element. The front elevation of building C would be set back 2.7m from the front boundary of the site. The rear block of building C would be sited between 5.1m and 9.4m from the flyover. A 4.2m gap is proposed between building C and E. The front block of building C would be sited 4m from the eastern site boundary and the rear block would be sited 11.5m from this site boundary.
- 2.6 **Building D (the Hub)** would be situated at the southern-most part of the site, and would front Masons Avenue. It would comprise two individual blocks which would be separated by a 13.4m gap, the proposed emergency vehicular/pedestrian access to the site. These two blocks would have a combined floor area of 1,165 sqm. The Hub would have a B1 office use. The block on the western side of the entrance would be two-storeys fronting Masons Avenue (6.9m high), and would increase to three storeys towards its rear (10.4m high). It would have a maximum depth of 19m and a maximum width of 22.6m. The front elevation of this building would align with the front elevation of No. 25 Masons Avenue. The block on the eastern side of the entrance would be located immediately beneath the flyover. It would have a single storey height (3.7m maximum). It would have a maximum width of 23.6m and a maximum depth of 17.2m. The front elevation of this building would align with the front elevation of No. 47 Masons Avenue for a width of 8.6m before stepping out a further 2.1m. A 21.8m gap is proposed between building E and D (the Hub).

- 2.7 **Building E** would be situated to the rear of Building C. It would be sited on the eastern side of the flyover. It would contain 7 flats and a commercial / community unit (flexible A1, B1, D1, D2 use) at ground floor level (81.7sqm). This building would be 13.475m high with a further 1.9m lift overrun. It would be 16.3m wide x 13.3m deep. This building would feature a roof terrace. Building E would be sited 3.8m from the eastern site boundary and between 9.2m and 11.8m from the flyover.
- 2.8 74 (40%) of the 186 proposed new homes would be affordable and 112 (60%) would be private. Of the 74 affordable homes, 28 (37%) would be for affordable rent and 46 (62%) would be offered through intermediate products. All of the affordable homes would be provided as one, two or three bedroom flats and would be located across buildings A, B, C & E.
- 2.9 The proposal makes provision for 1,165m<sup>2</sup> office floorspace which would be entirely located within the Hub. It also makes provision for 695m<sup>2</sup> flexible commercial and community floorspace (use classes A1, B1, D1, D2) within parts of the ground floor of buildings A, B, C and E.
- 2.10 Alterations to an existing vehicular crossover on Palmerston Road (to the west of the Palmerston Road / George Gange Way roundabout) are proposed. This would provide vehicular access to the proposed basement.
- 2.11 A secondary vehicular access would be provided from Masons Avenue via an altered crossover.
- 2.12 69 car parking spaces are proposed within the basement: 4 allocated for 'blue badge' holders and 65 for residents (including 31 stackers).
- 2.13 19 of the 65 residential carparking spaces would be allocated to wheelchair accessible homes
- 2.14 14 electric parking bays and 14 future electric parking bays are proposed
- 2.15 6 motorcycle spaces are proposed
- 2.16 1 service bay is proposed in the basement
- 2.17 329 cycle parking spaces are proposed
- 2.18 Three lifts would provide access from the basement to ground floor level for residents, 'blue badge' holders
- 2.19 Five pedestrian site entrances are proposed (four from Palmerston Road and one from Masons Avenue)
- 2.20 A refuse storage area is proposed in the ground floor of each of the proposed blocks A, B, C and E. A refuse holding area for the residential units is proposed in the ground floor of block E.



- 2.21 A refuse storage area for the commercial units is proposed adjacent to block D.
- 2.22 The space around the various buildings would serve as public realm. Five sets of entrance gates are proposed
- Between blocks A and B
  - Between block B and the flyover
  - Between block C and the flyover
  - Between block C and the eastern site boundary
  - Between the two Hub buildings
- 2.23 The landscape proposals include lighting, seating, children's play facilities and planting

**AMENDMENTS SINCE SUBMISSION OF ORIGINAL APPLICATION:**

- 2.24 The number of residential units have been reduced from 187 to 186 units – the ground floor residential unit in block E has been omitted and is now proposed as a refuse holding area.
- 2.25 An additional commercial unit has been provided within the ground floor of block A.
- 2.26 The layout of the northern-most commercial unit in block B has been revised.
- 2.27 The layout of the basement has been revised. This has resulted in a reduction in the number of carparking spaces from 71 to 69.
- 2.28 The design and layout of blocks D and E have been revised.
- 2.29 Roof gardens have been added to the lower elements of blocks B and C. A green roof has been added to the lower part of block A and to part of the Hub building.
- 2.30 PV panels have been moved from the lower elements of blocks B and C to the higher elements.
- 2.31 The red line boundary has been amended to include a commercial unit fronting Masons Avenue.
- 2.32 Revised tenure arrangements.
- 2.33 Refinement of the appearance of the blocks.
- 2.34 Revised delivery and servicing arrangements.
- 2.35 Revised landscaping layout.
- 2.36 Inclusion of attenuation tank beneath block D.

- 2.37 All wheelchair units are now proposed within block B
- 2.38 Inclusion of a Conservation Statement, a Secure by Design Statement, a Contamination Assessment and Phase 1 Desk Top Study.
- 2.39 Updated visual impact assessment, Travel Plan, Delivery and Servicing Plan, Transport Assessment, Economic Statement, Design and Access Statement and Planning Statement.
- 2.40 Addendum to Energy Statement and FRA. Additional correspondence from drainage consultant, wind consultant and acoustic consultant submitted.

### **3.0 HISTORY**

#### **3.1 37 - 41 Palmerston Road**

HAR/18467/B: Erect warehouse office transport garage  
Grant 8<sup>th</sup> - April 1963

HAR/18467/E: Use warehouse storage, service cars and light commercial vehicles  
Grant - 14<sup>th</sup> April 1965

LBH/9037/1: Change of use from residential to use as staff rooms, canteen and offices for use in conjunction with garage and workshop at rear  
Grant - 25<sup>th</sup> February 1975

LBH/31273: Redevelopment to provide warehouse building with parking spaces  
Grant - 8<sup>th</sup> January 1987

LBH/31712: Use for repairing, panel beating, and paint spraying of motor vehicles  
Grant - 7<sup>th</sup> May 1987

EAST/30/96/FUL: Change of use of part from vehicle hire and vehicle repair to vehicle repair workshop with parking  
Grant - 16<sup>th</sup> May 1996

P/1855/11: Use of car park as a hand car wash (sui generis), new canopy  
Grant - 5<sup>th</sup> September 2011

#### **3.2 5 - 11 Palmerston Road**

No. 7 - EAST/192/00/FUL - Replacement single storey building ancillary to workshop  
Granted - 05/05/2000

R/O 7-9 - EAST/33660/87/CLE: Established use certificate general motor repairs  
Granted - 19/11/1987

No. 9-11 - LBH/3403/3- Continued use of building for printer's workshop storage and office accommodation (Rear of 9/19)  
 Granted - 22/08/1977

3.3 Masons Avenue

Land adjacent to 47 Masons Avenue - P/1021/12 - Use of vacant land for the parking of vehicles in connection with the provision of MOT testing services within the existing vehicle repair garage at 14-16 Masons Avenue, Wealdstone, HA3 5AP  
 Granted – 13/07/2012

27 Masons Avenue - P/0189/09 - Change of use of part of the premises from B2 use (general industrial - food manufacturing) to ancillary shop; new shop front.  
 Granted – 25/03/2009

29 Masons Avenue - P/0219/10 - Construction of a single storey warehouse (use class B8) to replace previous warehouse  
 Granted - 29/04/2010

**4.0 CONSULTATION**

1<sup>st</sup> Consultation

- 4.1 9 Site Notices were erected on 4<sup>th</sup> May 2016, expiring on 26<sup>th</sup> May 2016.
- 4.2 Press Notice was advertised in the Harrow Times on the 5<sup>th</sup> May 2016, expiring on 25<sup>th</sup> May 2016
- 4.3 The application was advertised as a Major Planning Application and as a departure from the Development Plan.
- 4.4 A total of 639 consultation letters were sent to neighbouring properties regarding this application. The public consultation period expired on 23<sup>rd</sup> May 2016.
- 4.5 Two separate petitions against the proposed development and five individual responses were received.
- 4.6 A summary of the responses received along with the Officer comments are set out below:

<b>Summary of Comments</b>	<b>Officer Comments</b>
Objects to the application due to: • Parking congestion	Issues relating to parking congestion are assessed within section 6.6 of this report.
Commented that • Residential units should be targeted towards first time buyers rather than buy to let	Issues relating to affordable housing, building height, wind impacts and parking congestion

<p>investors</p> <ul style="list-style-type: none"> <li>• Concerned about the proposed building height - impact on skyline and neighbours natural light</li> <li>• There is already a wind tunnel effect along part of Palmerston Road</li> <li>• Insufficient parking proposed</li> </ul>	<p>are assessed within sections 6.6, 6.4 and 6.6 of this report.</p>
<p>Objects to the application due to:</p> <ul style="list-style-type: none"> <li>• Impact upon residential amenity</li> <li>• Failure to respect local context and planning policy</li> <li>• Overdevelopment</li> <li>• Site access proposals are not acceptable and would lead to a safety hazard</li> <li>• Contrary to Human Rights Act</li> </ul>	<p>Issues relating to residential amenity, density and site access are assessed within sections 6.5 and 6.6 of this report. The proposal has been assessed against the up-to-date development plan. The provisions of the Human Rights Act 1998 have been taken into account in the processing of the application and the preparation of the report.</p>
<p>Objects to the application due to:</p> <ul style="list-style-type: none"> <li>• Scale and character of the proposal</li> <li>• Traffic congestion</li> <li>• Exacerbate overpopulation in Wealdstone</li> <li>• Lack of resources in Wealdstone</li> <li>• Block sunlight to neighbouring properties</li> <li>• Loss of privacy</li> <li>• Floodrisk</li> <li>• Loss of trees</li> <li>• Maintenance of the flyover will be difficult or infeasible</li> <li>• Tower block housing is not the right solution for Wealdstone</li> <li>• Lack of sustainability</li> </ul>	<p>Issues relating to the scale of the proposal, traffic congestion, neighbouring amenity, floodrisk, impacts upon the flyover and sustainability are assessed within sections 6.4, 6.6, 6.5, 6.8 and 6.9 of this report. Monies are being sought through CIL and through the S106 agreement to mitigate the impacts of the proposal on 'resources'.</p>
<p>Objects to the application due to:</p> <ul style="list-style-type: none"> <li>• Parking and traffic congestion</li> <li>• Over-population and over-crowding</li> <li>• Lack of visual appeal</li> <li>• Impact on privacy and sunlight</li> <li>• Out of character with the area</li> </ul>	<p>Issues relating to parking congestion, density, appearance, amenity and character of the area are assessed within sections 6.6, 6.4 and 6.5 of this report.</p>
<p><b>Petition with 41 signatures</b></p> <p>Objects to the application due to:</p> <ul style="list-style-type: none"> <li>• Traffic congestion</li> </ul>	<p>Issues relating to traffic congestion are assessed within section 6.6 of this report.</p>

<p><b>Petition with 23 signatures</b></p> <p>Objects to the application due to:</p> <ul style="list-style-type: none"> <li>• Detrimental impacts upon residential amenities and need to avoid town cramming</li> <li>• Loss of privacy and overlooking</li> <li>• Overshadowing / Loss of light</li> </ul>	<p>Issues relating to amenity are assessed within section 6.5 of this report.</p>
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## 2<sup>nd</sup> Consultation

- 4.7 9 Site Notices were erected on 23<sup>rd</sup> August 2016, expiring on 14<sup>th</sup> September 2016.
- 4.8 Press Notice was advertised in the Harrow Times on the 25<sup>th</sup> August 2016, expiring on 16<sup>th</sup> September 2016.
- 4.9 The application was advertised as a Major Planning Application and as a departure from the Development Plan.
- 4.10 A total of 639 consultation letters were sent to neighbouring properties regarding this application. The public consultation period expired on 8<sup>th</sup> September 2016.
- 4.11 One petition against the proposed development and six individual responses were received.
- 4.12 A summary of the responses received along with the Officer comments are set out below:

<b>Summary of Comments</b>	<b>Officer Comments</b>
Supports the proposal	Noted
<p>Objects to the application due to:</p> <ul style="list-style-type: none"> <li>• Eyesore</li> <li>• Blot on social environment</li> <li>• Is there adequate service provision and parking</li> </ul>	<p>Issues relating to appearance and parking provision are assessed within section 6.4 and 6.6 of this report.</p>
<p>Objects to the application due to:</p> <ul style="list-style-type: none"> <li>• Impacts on views of Wealdstone</li> </ul>	<p>Issues relating to appearance and parking provision are assessed within section 6.4 and 6.6 of this report.</p>
<p>Objects to the application due to:</p> <ul style="list-style-type: none"> <li>• Impacts on ground stability</li> <li>• Privacy and sunlight</li> <li>• Noise</li> </ul>	<p>Issues relating to ground stability and amenity are assessed within sections 6.8 and 6.5 of this report.</p>

<p>Objects to the application due to:</p> <ul style="list-style-type: none"> <li>• Overdevelopment</li> <li>• Overshadowing, loss of privacy and light</li> <li>• Anti-social behaviour in the public realm</li> <li>• Further traffic congestion</li> <li>• Already insufficient drainage</li> <li>• Lack of infrastructure</li> </ul>	<p>Issues relating to density, amenity, anti-social behaviour, traffic congestion, drainage and infrastructure are assessed within sections 6.5, 6.4, 6.8 and 6.9 of this report.</p>
<p>Objects to the application due to:</p> <ul style="list-style-type: none"> <li>• 17 storeys is inappropriate for Wealdstone</li> <li>• Further traffic congestion</li> </ul>	<p>Issues relating to building height and traffic congestion are assessed within sections 6.4 and 6.6 of this report.</p>
<p><b>Petition with 44 signatures</b></p> <p>Objects to the application due to:</p> <ul style="list-style-type: none"> <li>• Further traffic and people congestion</li> </ul>	<p>Issues relating to traffic congestion are assessed within section 6.6 of this report.</p>

4.13 Statutory and Non Statutory Consultation

4.14 The following consultations have been undertaken on 28<sup>th</sup> April and on 17<sup>th</sup> August:

LBH Environmental Health  
 LBH Highways  
 LBH Travel Plan Officer  
 LBH Planning Policy  
 LBH Design Officer  
 LBH Conservation Officer  
 LBH Landscape Architect  
 LBH Waste Officer  
 LBH Biodiversity Officer  
 LBH Housing Enabling  
 LBH Drainage Authority  
 LBH Economic Development  
 TFL  
 Greater London Authority  
 Environment Agency  
 Designing Out Crime Officer, Metropolitan Police Service  
 Affinity Water  
 Thames Water Authority  
 Campaign for a Better Harrow  
 NHS Harrow  
 Health & Safety Executive  
 Ministry of Defence  
 Brent and Harrow Chamber of Commerce  
 Civil Aviation Authority  
 Commission for Architecture and the Built Environment

4.15 External Consultation

4.16 A summary of the consultation responses received are set out below.

Transport for London

1<sup>st</sup> Consultation Response – Summary - Whilst noting that the current proposals for gating the development “at night” are not supported, and further information is needed, in order to ensure that the proposed development complies with the transport policies in the London Plan, the following matters should be addressed:

- Minor revision of car park layout to better facilitate larger vehicle manoeuvres
- Provision of EVCPs to be secured
- Further information on walking, cycling and public realm
- Reconsideration of gating proposals
- Revision to trip generation /modal split analysis
- Revision to and Provision of a Workplace Travel Plan to be secured
- Provision of a Delivery and Servicing Plan to be secured
- Contributions towards the Mayoral CIL are required and further discussion on possible mitigation of impacts on public transport and non-vehicular modes

These items should be secured via the appropriate planning conditions and obligations.

2<sup>nd</sup> Consultation Response – Summary - Whilst noting that the current proposals for gating the development “at night” are now not objected to, TfL considers the servicing proposals inadequate and poorly thought through, and cannot support that aspect. Walking and Cycling is not measurably improved by the development, either.

3<sup>rd</sup> Consultation Response – In summary, on balance TfL is reasonably satisfied with the proposal if the above matters can be addressed and subject to:

- details of the ramp to the design guidance above being secured and constructed, and
- conditions securing detailed information on construction, parking, servicing and travel planning as advised previously (please carry them forward from TfL’s earlier full responses).

Greater London Authority

1<sup>st</sup> Consultation Response – Summary – Whilst the scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan as set out below:

- Opportunity Area – the proposal to deliver a high quality, high density residential led mixed use scheme in the Harrow and Wealdstone Opportunity Area is strongly supported, and would further the aims of the London Plan Policy 3.3 (increasing housing supply) as well as the AAP objective to deliver the urban renewal of Wealdstone town centre.
- Employment – the proposed shift from general industry to office-led small

business workspace is supported in line with London Plan policies 2.7 and 4.2. An Employment Management Plan should be secured via Section 106 to secure a flexible and accessible package of workspace terms – designed to incubate and support new items.

- Housing – The proposed housing provision (including 42% affordable by habitable room) is broadly supported in line with London Plan policy 3.3 subject to verification of the maximum reasonable amount of affordable housing.
- Urban Design – The proposed design and public realm provision is broadly supported, and the prominent scheme would act as a beacon of regeneration for Wealdstone. Further discussion is nevertheless sought with a view to optimising the generosity and legibility of routes through the site in line with London Plan policy 7.1.
- Inclusive Access – The proposed response to access and inclusion is broadly supported in line with London Plan policy 7.2. However, a space-sharing strategy should be secured to detail how shared area would be designed to be safe and accessible for elderly and disabled people.
- Sustainable Development – The proposed energy strategy and climate change adaptation measures are broadly supported in strategic planning terms. Following the conclusion of discussions on the energy strategy and roofscape strategy, the Council is encouraged to secure the associated energy and adaptation details by way of planning condition in accordance with London Plan policies 5.2, 5.10, 5.11, 5.12, 5.13 and 7.19.
- Transport – Whilst the scheme is generally acceptable in strategic transport terms, issues with respect to access, servicing, trip generation, modal split and transport impact, walking and cycling, parking, travel planning and construction should be addressed in line with London Plan policies 6.3, 6.9, 6.10, 6.13 and 6.14.

The resolution of the outstanding issues above could lead to the application becoming compliant with the London Plan

2<sup>nd</sup> Consultation Response – Summary – GLA Officer confirmed via telephone that the revisions did not merit a further review of the scheme.

### Environment Agency

1<sup>st</sup> Consultation Response – Summary – The use of voids, stilts or undercroft parking as mitigation for a loss in floodplain storage should be avoided as experience shows that they become blocked over time by debris or domestic effects. However in this case the applicant has modelled the flood risk on site and adequately justified why traditional level for level volume for volume floodplain compensation cannot be provided. We are pleased to see that design measures have been taken to ensure that objects cannot be stored in this void area underneath Block D. As discussed, it is important that maintenance is undertaken to ensure that the void does not become blocked over time and potentially pose a flood risk. The applicant has suggested maintenance measure to be delivered via a maintenance strategy to include visual inspections and clearance of debris to ensure flood flowpaths are not obstructed (paragraph 4.18 and 4.19). The developer (Origin Housing) has agreed for a maintenance strategy to be secured via a legal agreement to ensure the void space remains clear for the lifetime of development. On this



basis we therefore recommend that you work with the applicant to secure a legal agreement to ensure that there is a maintenance strategy for the lifetime of the development.

2<sup>nd</sup> Consultation Response – Summary – No objections to the proposed works subject to the inclusion of the following condition on any subsequent planning permission.

Prior to occupation of development the applicant must submit a Culvert Structural Condition Survey of the Wealdstone Brook (Main River) which runs in culvert through the site to the Local Planning Authority. The report must demonstrate that the construction of the development has not had a detrimental impact on the condition and structural integrity of the culverted Wealdstone Brook.

Should the survey shows that the construction has had a detrimental impact on the structural integrity of the culvert the applicant must submit a remedial strategy to bring the culvert back to appropriate condition which should be approved in writing by the Environment Agency and the Local Planning Authority.

The remedial works shall be carried out in compliance with the approved report and completed prior to occupation of the development.

The applicant must ensure that the proposed alterations to buildings on site do not prevent or reduce the capacity of the flood plain compensation on site. We recommend that they submit confirmation of this in writing to you (the LPA) as a further addendum to the submitted FRA to clarify this. We would object to any proposal to alter the agreed flood plain compensation scheme.

The applicant has not proposed to open the culverted section of the Wealdstone Brook that runs through the site. In line with policy DM11(C) of Harrow's Local Plan where deculverting on site has been shown to be financially viable but not feasible the Council should seek a financial contribution to off-site projects to provide enhancements to the river channel. We recommend that you (the LPA) pursue this through a Section 106 Agreement.

#### Designing Out Crime Officer, Metropolitan Police Service

1<sup>st</sup> Consultation Response – Summary – No objection subject to a condition upon the development for security purposes that the developers are required to achieve Secured By Design accreditation rather than adhere to the principles of Secured By Design

2<sup>nd</sup> Consultation Response – Summary – No objection subject to the above condition

#### Affinity Water

1<sup>st</sup> Consultation Response – No response received

2<sup>nd</sup> Consultation Response – No response received

### Thames Water Authority

1<sup>st</sup> Consultation Response – Summary – Thames Water has been unable to determine the waste water infrastructure needs of this application. Should the local Planning Authority look to approve the application, we request that the following ‘Grampian style’ condition be applied:

Development shall not commence until a drainage strategy detailing any on and/or off site drainage works has been submitted to and approved by the Local Planning Authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed.

2<sup>nd</sup> Consultation Response – Summary – In addition to the above condition, the following condition is also recommended

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for works) has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

### Campaign for a Better Harrow

1<sup>st</sup> Consultation Response – Summary – No response received

2<sup>nd</sup> Consultation Response – Summary – Objects to the development on the following grounds 1) Major departure from the AAP, 2) Dubious resistance to flooding, 3) Job creation

### NHS Harrow

1<sup>st</sup> Consultation Response – No response received

2<sup>nd</sup> Consultation Response – No response received

### Health & Safety Executive

1<sup>st</sup> Consultation Response – No response received

2<sup>nd</sup> Consultation Response – No response received

### Ministry of Defence (Northolt Safeguarding)

1<sup>st</sup> Consultation Response – Summary – No objections to the proposal, subject to the following condition:

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.

2<sup>nd</sup> Consultation Response – No response received

#### Brent and Harrow Chamber of Commerce

1<sup>st</sup> Consultation Response – No response received

2<sup>nd</sup> Consultation Response – No response received

#### Civil Aviation Authority

1<sup>st</sup> Consultation Response – No response received

2<sup>nd</sup> Consultation Response – No response received

#### Commission for Architecture and the Built Environment

1<sup>st</sup> Consultation Response – No response received

2<sup>nd</sup> Consultation Response – No response received

#### Conservation Areas Advisory Committee

1<sup>st</sup> Consultation Response – No response received

2<sup>nd</sup> Consultation Response – No comments to provide

#### 4.17 Internal Consultation

4.18 A summary of the consultation responses received are set out below.

#### LBH Environmental Health

1<sup>st</sup> Consultation Response – No objections subject to a number of planning conditions relating to contaminated land, air quality (construction phase and operational phase), noise, daylight, pedestrian windclimate and lighting

2<sup>nd</sup> Consultation Response – Summary – Conditions suggested previously remain. Concerns regarding the air quality in the play area. If possible, could this be conditioned so that air quality monitoring is undertaken prior to developing this area for children.

## LBH Highways Infrastructure

1<sup>st</sup> Consultation Response – Summary - Reservations about the fire risk to the bridge deck will remain until there is a formal assessment by a qualified / competent professional provided to substantiate the design proposed. The application documentation does also say that this will be done.

One of the bridge supports will be enclosed by the building. No specific details are provided about how the building will be constructed around the bridge support. There will need to be an unobstructed exclusion zone around the support of at least 2 metres at all times to allow unrestricted access to the by the Council or its contractors to allow any inspections, maintenance as necessary.

From a health perspective there is also a risk with this design that birds may congregate on the roof of the building below the bridge deck leaving mess, etc. It may necessary to consider what interventions may be required to prevent this from happening.

2<sup>nd</sup> Consultation Response – No objections subject to a legal agreement to ensure that:

The Council Engineer or its appointed contractor shall be afforded unrestricted access to undertake periodic bridge structure condition inspections.

The Council's appointed contractor shall be afforded unrestricted access to undertake any maintenance works to the bridge structure deemed necessary by the Council's Engineer.

Should any required inspection or maintenance works require the removal of the proposed structure (The Hub) the property owner must arrange for its removal within the timeframe specified by the Council Engineer.

The Council will have the right to remove or partially remove the proposed structure to undertake required works should the property owner fail to cooperate.

No part of the proposed structure shall break the surface of the bridge structure

No attachments shall be made to the bridge structure without the permission of the Council Engineer.

3<sup>rd</sup> Consultation Response - The plan shows a 1.5m cycle lane on the 5.7m wide ramp which is insufficient width to allow two cycles and two cars to pass each other.

The reduction in overall parking numbers is not considered a significant loss. The shape of the basement results in a difficult layout for parking arrangement. Whilst alterations have been made, there is still remaining concern that some of the bays may prove difficult to use.

The proposed arrangements are considered to be acceptable in terms of providing servicing accessibility across the site with minimal impact on the surrounding highway network.

We have reviewed the methodology used to provide trip rates and as there is no significant change, we are satisfied that the information provided is acceptable

## LBH Highways

### 1<sup>st</sup> Consultation Response – Summary –

Parking provision - although it is a bit low, it complies with London Plan parking standards. Also, looking at Census data (2011) on car ownership it would appear that this level of parking should be sufficient for the needs of the development within the Marlborough ward.

Basement - The layout is a bit unusual and shows some conflicts.

Cycle parking - The numbers of cycle spaces comply with London Plan 2016 standards for residential long term, but do not seem to provide for residential short stay.

PERS - The suggestion for a pedestrian crossing near to the proposed entrance in the west side of Palmerston Road is accepted and should be secured via a s106 agreement. It would also be appropriate for a contribution towards public realm improvements being agreed which could go towards carrying out the works identified as needing improvement.

CERS - the results do not highlight any great concerns

Delivery and Servicing – The arrangements for delivery and servicing are of some concern. We do not support the proposal for deliveries to solely take place in the basement area.

Refuse collection - With regard to refuse collections, it is considered that there is insufficient detail at this stage to form an opinion. We need to know how many bins would be required for the site and exactly how they would be transferred. This would then give an indication of whether the proposed arrangement is suitable for kerbside collection from Masons Avenue.

### 2<sup>nd</sup> Consultation Response – Summary –

Trip generation – concerns in relation to the data

Parking - This level of provision of parking spaces is considered acceptable given the good public transport accessibility at this location. Car parking provision will be in accordance with London Plan 2016 standards.

Basement layout - The layout of the basement car park is irregular and doesn't appear to be easily accessible, particularly for disabled drivers. It is also doubtful that disabled residents living in the proposed block on the east side of Palmerston Road will find parking in this car park acceptable due to the length and practicality of the route involved. A parking management plan is required to explain how parking spaces will be allocated and enforced.

Cycle parking - Further information on segregation or other measures to ensure safety of cyclists accessing the basement car park is required.

Servicing - It would be preferable to undertake servicing and refuse collections on-site rather than on the public highway, however it is considered that this arrangement is a feasible compromise solution and would formalise loading activity that would be likely to happen on-street in any case.

Walking and cycling - A sum should be secured by s106 agreement towards improvement of facilities in the local area. A further sum and agreement will be required for provision of a raised table crossing point at Palmerston Road west. This is to improve pedestrian accessibility and safety at this busy junction.

### LBH Travel Plan Officer

1<sup>st</sup> Consultation Response – Summary - The submitted travel plan requires revisions

2<sup>nd</sup> Consultation Response – Summary - The revised travel plan requires further revisions

### LBH Design Officer

Final Consultation Response –

The applicant has engaged in a collaborative process with Harrow design officers over the last 18 months, and the proposed development is an ambitious scheme that addresses a difficult set of sites in a coherent manner.

**Layout:** The strategy to link the two sites beneath the flyover is to be commended, bringing previously redundant space into use. This approach, coupled with provision of commercial units, maximises the public accessibility and usage of the site

**Massing:** While design officers recognise that the building height differs from recommendations in the AAP, they are supportive of the increased height and are of the opinion that the context can support tall buildings.

**Elevations:** The application was subject to two Design Review Panel (DRP) sessions. The Panel emphasised the importance of high design quality for tall buildings, and a number of issues were raised in respect of this, particularly focused on material and detailing of the elevations.

**Materials:** The prominence of the towers requires a robust approach to the design and detailing of the elevations, and the use of high quality natural stone cladding will make a positive contribution to the townscape. The applicant has addressed DRP comments relating to the cladding colour, with the selection of a more contextually sympathetic stone. Agreement of large-scale stone samples and 1:1 on site mock-ups will be required prior to construction work commencing.

**Public realm:** Comments made at the DRP on the legibility of routes through the site have been addressed in the application. It is understood that the site will be fully accessible to the public during daylight hours, and the development will improve connectivity in the area; making new links to both the station and high street. Further detailed resolution of the public realm and landscape will be required post planning.

**Employment space:** The provision of commercial units on the ground floors of the scheme has the potential to create an active and vibrant mix of uses. It is important that all units are of an appropriate type to attract potential occupiers and limit future vacancy. The 'Hub' building to the Southern edge of the site will create a new frontage to Masons Ave, revitalising an area of the street currently dominated by the flyover.

In summary, the applicant has addressed the majority of the concerns raised both by DRP and Harrow design officers. Generally the scheme is improved and officers are supportive of the design.

#### LBH Conservation Officer

1<sup>st</sup> Consultation Response – Summary - This proposal is in the setting of the locally listed buildings (36 High Street i.e. Lloyds bank and no. 21 The Bridge/Mason Ave, Wealdstone) and the Grade II Listed Harrow and Wealdstone Station. The proposal would be tall and impact on surrounding views to and from the much smaller scale of traditional station and other locally listed buildings. However, the key views provided in the design and access statement do not take account of the nearby listed buildings. This would be useful information though to fully assess the proposal.

2<sup>nd</sup> Consultation Response – Summary – No objections to the proposal

#### LBH Landscape Architect

1<sup>st</sup> Consultation Response – Summary – The proposed soft landscape and few proposed new trees appear to be placed in the left over spaces between the tall buildings (pedestrian circulation space) and narrow strips along some of the boundaries and adjacent to George Gange Way. High quality landscape design needs to be considered from the outset of the proposed development with sufficient space allocated around the proposed tall buildings and lower blocks, for soft landscape to create meaningful spaces, softening the buildings and providing an attractive setting and place to be. The proposed planting may need to be tough to tolerate the local microclimate. Since there are few opportunities for soft landscape at ground level, the inclusion of green roofs and green walls would be essential. The planters are angular in shape and although this is noted it is to assist directing people through the site, the narrow pointed corners would be too narrow and unsuitable to support plants. A drainage and irrigation system would be essential for the survival of the planting and particularly the trees over the underground car park area.

2<sup>nd</sup> Consultation Response – Summary –

It is good to see that more work has been carried out on the lighting, but more detail is required.

It is good to see that proposed boundary edge planting has been added, although the proposal is narrow belts of planting ranging from under 2 metres to 3 metres in width.

The proposed planting adjacent to the car park ramp, north west of Block A could be extended southwards. How would this proposed planting be maintained.

The main pedestrian north / south route is tight and much less generous than the north / south route adjacent to Block C. There is a clutter of ramps (1:12 and 1:20) and steps (level changes), together with a pinch point between the north east corner of block B and the raised planter. Is it essential to have both steps and a ramp in this area, and might there be a possibility to provide only a ramp, expanding and amalgamating the paved open space area? The angled

steps and ramp are both relatively narrow and restricted and in reality the space would feel tight/ constricted.

The proposed external areas between Blocks A and B are formal, linear pedestrian routes lined with planters. Planting could be useful to soften the space and partially assist in reducing the impact of wind, however the proposed plants would have to be tough enough to survive the extremes of microclimate.

It would be useful in the landscape and public realm strategy to fully understand the design intent and requirement for the outside spaces/ communal courtyards between Blocks A and B and to the rear of Blocks C and E.

Beedon gravel under the proposed tree pits would easily be kicked and worn away and be unsuitable in this urban area.

Proposed planters need to be sufficiently high, with enough soil width and depth for survival of the planting, bulky enough to provide pedestrian direction and privacy, but this has to be balanced against preventing visual obstruction, site security and movement across the site.

It is good to see that the roof gardens have been reinstated on Blocks B and C together with the roof garden for Block E. Much more hard and soft detailed design would be required to have a full understanding of how these would work. The roof tops would be exposed, plant choices would need to be appropriate for the local microclimate, together with the requirement for planters of sufficient width and depth to sustain and enable survival of the planting. Drainage and irrigation system detail would be required.

#### LBH Waste Management Officer

1<sup>st</sup> Consultation Response – Summary - Concerned about the proposal to have a kerbside collection on Masons Avenue. It would also be good to know how many bulk bins they believe would be adequate to avoid excess waste, is there a dropped kerb access to the bins and the distance the operatives are expected to travel to collect the bins.

2<sup>nd</sup> Consultation Response – No objections provided the insert bay keeps the bulk of the vehicle off the highway. 46 bins (mixture of general and dry recyclable waste) are required to serve the residential element. An on-site collection point is required. The commercial units will have to arrange their own trade waste collections as they are legally required to do.

#### LBH Biodiversity Officer

1<sup>st</sup> Consultation Response – Summary - There appears to be a rather minimalistic approach to urban greening and green infrastructure shown in the landscaping plan for the proposal. It has narrow bands and small islands of vegetation which in my opinion would be of little use for wildlife. If space is a major consideration the use of green roofs and / or walls would be one possible solution.

I would want to see bird and bat boxes / tubes built into the fabric of the buildings. These should be in optimum positions to maximise the likelihood of use and specifically cater for national, regional or local Biodiversity Action Plan



(BAP) species appropriate to the urban locality of the proposed development.

2<sup>nd</sup> Consultation Response – No comments received

#### LBH Housing Enabling Officer

1<sup>st</sup> Consultation Response – Summary - Overall in terms of percentage affordable housing offer Origin have done well. However the number of 2b 3p and 3b 5p is disappointing. Ask the appointed consultant to test a number of the assumptions within the financial viability appraisal.

2<sup>nd</sup> Consultation Response – Summary - Compared to affordable housing delivery by the private sector this offer is by far the highest percentage seen to date. Whilst Housing Enabling support this scheme because of the high affordable housing offer, it is disappointing that the affordable rented tenure offers the majority of 2 bedroom homes as 3 person whereas the Council's priority demand is for 2 bedroom 4 person. In the shared ownership tenure 19 2 bedroom 4 person homes are being delivered out of a total of 26.

#### LBH Drainage Authority

1<sup>st</sup> Consultation Response – Summary - Happy with the drainage strategy submitted but have the following comments:

- Insufficient volume of storage is proposed. Blocks C & E require 120m<sup>3</sup> and blocks A & B 150m<sup>3</sup>. The Volumetric Run-off Coefficient should be substantiated by calculations (Reference to Chapter 13 of The Wallingford Procedure) or a figure of 0.95 should be used for winter and summer. Please note that a value for UCWI of 150 is appropriate when calculating Percentage Runoff (PR) for storage purposes and 35% allowance for climate change should be used.
- 5m not 3m exclusion zone for an ordinary watercourse is required.
- Flood protection (warning system, flood gates) of underground car parks should be proposed.
- A wire mesh on voids in block D and its maintenance may be an issue. I'd suggest using vertical bars instead.

2<sup>nd</sup> Consultation Response – No objections subject to three standard pre-commencement drainage conditions

#### LBH Economic Development

1<sup>st</sup> Consultation Response – Summary - The Economic statement and Planning Statement both stress the temporary construction jobs to be created, the employment space to be provided and the multiplier effect on the local economy.

The provision of construction jobs will only benefit the local economy if the developer produces and implements an employment and training plan which provides apprenticeship, work experience and employment opportunities for Harrow residents. The provision of apprenticeships will help address the skills shortage in the construction industry and address Council pledge to support young people into employment and apprenticeships

Provision will need to be made to fund Harrow's construction employment and training initiative which will act as a broker between residents, training providers and contractors.

The provision of employment space will help stimulate the daytime economy in Wealdstone District Centre. Permitted development has led to Harrow's loss of significant office floorspace, the provision of new space is welcome. However, it needs to address the needs of existing businesses as well as start-ups.

2<sup>nd</sup> Consultation Response – The submission of an Employment Management Plan is required and this shall provide detailed information relating to how the Hub building will be managed and what services will be offered to the occupants / businesses.

## **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] which consolidates national planning policy 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].

## **6.0 APPRAISAL**

6.1 The main issues are:-

### **6.2 PRINCIPLE OF DEVELOPMENT – POLICY AND REGENERATION**

- 1) National Planning Policy Framework
- 2) The London Plan
- 3) Harrow Core Strategy and Harrow & Wealdstone Area Action Plan
- 4) AAP Site Allocation 6
- 5) Assessment of Material Planning Considerations
- 6) Town Centre Policy

### **6.3 HOUSING OUTPUT**

- 7) Affordable Housing

- 8) Housing Supply, Density and Overall Housing Mix

#### **TOWNSCAPE AND DESIGN QUALITY**

- 9) Development Height
- 10) Tall Buildings
- 11) Taller Buildings
- 12) Locally Protected Views
- 13) Townscape Character
- 14) Lifetime Neighbourhoods

#### **RESIDENTIAL AMENITY**

- 15) Residential Quality of Proposed Development
- 16) Amenity of Neighbouring Occupiers

#### **TRANSPORT AND PARKING**

- 17) Access and Highways and Public Transport
- 18) Delivery and Servicing
- 19) Cycle and Car Parking Provision
- 20) Walking / Cycling

#### **LANDSCAPE AND ECOLOGICAL CONSIDERATIONS**

- 21) Heritage Assets
- 22) Areas of Special Character
- 23) Ecology, Biodiversity and Trees

#### **CLIMATE CHANGE AND ENVIRONMENTAL**

- 24) Flood Risk and Sustainable Drainage
- 25) Carbon Dioxide Emissions Reductions
- 26) Sustainable Design and Construction
- 27) Decentralised and Renewable Energy
- 28) Air Quality, Ventilation and Odour
- 29) Noise
- 30) Contaminated Land

#### **INFRASTRUCTURE**

- 31) Electricity and Gas
- 32) Water Use and Waste Water Capacity
- 33) Waste and Recycling
- 34) Other Infrastructure

#### **CONCLUSION**

### **6.2 PRINCIPLE OF DEVELOPMENT – POLICY AND REGENERATION**

#### National Planning Policy Framework (NPPF)

- 6.2.1 The National Planning Policy Framework (NPPF) was published by the Government in 2012 as a streamlined replacement of the previous suite of national planning policy statements and associated publications. For decision making purposes, the NPPF is a material consideration.

- 6.2.2 The NPPF was taken into consideration as part of the examination-in-public of Harrow's Core Strategy, prior to the adoption of the Strategy in 2012, and informed the preparation of Harrow's other Local Plan documents prior to their adoption in 2013. Both the Core Strategy and the other Local Plan documents are therefore fully in accordance with the principles and policies of the NPPF.
- 6.2.3 The NPPF describes the pursuit of sustainable development as involving improvements to people's quality of life and to the quality of the built, natural and historic environment. At the heart of the NPPF is a presumption in favour of sustainable development.

The London Plan (Consolidated with Alterations Since 2011) (2016)

- 6.2.4 The Further Alterations to the London Plan were the subject of examination-in-public during 2014. In March 2015, the Mayor of London published an updated version of the Plan consolidated with the adopted further as well as previously adopted alterations.
- 6.2.5 On the 14<sup>th</sup> March 2016, the Major of London published the parking standards and Housing Standards Minor Alterations to the London Plan (MALPs). Under the provisions of section 38 of the Planning and Compulsory Purchase Act 2004, from 14 March 2016 the MALPs are operative as formal alterations to the London plan and form part of the development plan for Harrow. These Minor Alterations to the London Plan (MALP) are known as the Housing Standards MALP and the Parking Standards MALP.
- 6.2.6 The spatial strategy for London is set out at chapter 2 of the London Plan. It uses a number of strategic designations to identify areas for more accelerated levels of change, pursuant to the objective of accommodating London's objectively assessed development needs. Among the designations are 'Opportunity Areas' and 'Intensification Areas'. As part of the now adopted further alterations to the Plan, the strategic designation of Harrow & Wealdstone has changed from that of an Intensification Area to an Opportunity Area, with an expectation that higher density residential and mixed-use development on key strategic sites will contribute to the delivery of 3,000 jobs and a minimum of 2,800 new homes within the Area
- 6.2.7 In recognition that population growth in London is likely to be significantly above that which was anticipated in the original 2011 version of the Plan, and informed by new evidence, the 2016 London Plan adopts an annual London-wide housing target for the new plan period 2015-2025 of 42,389 p.a. (up from 32,210 p.a. for the period 2011-2021) of which Harrow's annual target for the new plan period is 593 p.a. (up from 350 p.a. for the period 2011-2021). As with the original 2011 Plan, the targets contained within the 2016 London Plan fail to reconcile a potentially significant gap between household growth projections and the identified availability of land for new housing, meaning that the targets continue to be expressed as minima. There must be, therefore, a renewed emphasis on all boroughs meeting and exceeding their housing targets.

6.2.8 Turning to strategic non-residential forecasts, the London Plan (2016) continues to embody an important spatial role for London's network of town centres, noting that: "...A spread of successful town centres across London complements the role of the Central Activities Zone and supports the 'polycentric' structure promoted by the European Spatial Development Perspective".

Harrow Core Strategy (2012) and the Harrow & Wealdstone Area Action Plan (2013)

6.2.9 Harrow's spatial strategy for the plan period 2009-2026 is set-out in the Core Strategy (2012) and is predicated on a new, pro-active approach to growth management and place-making. The strategy focuses on the opportunity area, Harrow and Wealdstone, to deliver growth through higher-density residential and mixed-use development, it being a location with high levels of public transport accessibility and where there is capacity to accommodate and benefit from major change. Pursuant to the spatial strategy, the Core Strategy incorporates an objective to create 3,000 jobs within the opportunity area and a policy commitment to deliver a minimum of 2,800 new homes on sites to be identified and allocated in an area action plan.

6.2.10 The Harrow and Wealdstone Area Action Plan (AAP) (2013) seeks to establish the opportunity area as the 'Heart of Harrow', reassert Harrow's visibility as the capital of Metro-land in London and to reaffirm Harrow town centre's role as a Metropolitan Centre.

6.2.11 In recognition of the different issues and opportunities across the entire Heart of Harrow opportunity area, the AAP designates a total of seven sub areas. The application site is located within the 'Wealdstone Central' sub area. The objectives for the sub area comprise:

- regeneration of Wealdstone town centre;
- improve the image of the area and continue to support community uses and the small scale specialist retail offer;
- improved west east connectivity;
- manage and reduce flood risk.

6.2.12 The AAP also sets out a number of urban realm improvements and infrastructure requirements for the sub area. These include (but are not limited to): Improvements to public space south of Holy Trinity Church; Improvements to public realm at Harrow and Wealdstone station; Reconfiguration of roadspace to the west of the town centre; Provision of legible London and route waymarking from High Street to Leisure Centre and Headstone Manor; Addressing existing advertisement hoardings at Harrow and Wealdstone Station; Incorporation of CHP into all major new development; New CCTV facilities for the town centre; Town centre management; Flood mitigation measures and SUDS.

## AAP Site Allocation 6

- 6.2.13 As required by the Core Strategy, the AAP identifies sites with significant development opportunities over the plan period. These allocated sites are set out in chapter 5 of the AAP. They are essential to achieving wider regeneration objectives and are necessary to deliver infrastructure improvements across the Borough. It is estimated that the 22 allocated sites have a combined capacity to provide 3,684 new homes and to deliver over 3,000 jobs across the opportunity area.
- 6.2.14 The *Palmerston Road / George Gange Way* site (Site 6) is one such allocated site. It comprises five parcels of land – three parcels on the north-eastern, south-eastern and south-western sides of the roundabout, and two parcels east and west of the bridge on corners of George Gange Way and Masons Avenue. The key objectives for this allocated site comprise:
- strengthen the spatial definition of this part of Wealdstone;
  - improve impression of Wealdstone for drivers along George Gange Way;
  - achieve this via the introduction of a cluster/family of buildings.
- 6.2.15 The target outputs for the total allocated area are 95 homes and 95 jobs. The subject planning application brings forward two of these five parcels of land. These two parcels are the largest of the five parcels of the land and are located immediately south of the Palmerston Road / George Gange Way roundabout. The planning application (as revised) expects outputs on these two sites alone to be 186 homes and up to an estimated 150 new jobs.
- 6.2.16 Local Plan Policy AAP 4 *Achieving a High Standard of Development throughout the Heart of Harrow* resists development that would prejudice the development of other parts of a site or which would frustrate the delivery of allocated sites. In this instance, the commentary to the site allocation states under the heading 'site constraints/dependencies' that '*Successful redevelopment of the sites may require site assembly*'. However, it is noted under the heading 'delivery' that site assembly is not essential for the overall development of this site. Thus, the AAP does not require the allocated site (five parcels of land) to be brought forward as a single development proposal.
- 6.2.17 It is considered appropriate for the two parcels of land, which are the subject of this planning application, to be brought forward together. They are the largest of the five parcels and together they are capable of establishing a visible collection of prominent, complimentary, high-quality gateway buildings to Wealdstone, as required by the '*design considerations*' section of the site allocations commentary. In addition to this, the delivery of these two main parcels of land as one development provides a unique opportunity to create a coherent piece of public realm underneath the flyover that would unify these two sites.
- 6.2.18 In terms of outputs, the subject proposal would exceed the residential and employment targets for the entire allocated site (186 homes and an estimated up to an 150 net jobs) and would deliver high quality public realm. Furthermore, the remainder of the allocated site (three parcels of land) would

be capable of coming forward for development at a later stage and contributing to the objectives of the site (site 6) and the 'Wealdstone Central' sub area. Thus, their delivery would not be prejudiced by the subject proposal. It is therefore considered appropriate to consider and determine the development proposed under this planning application.

- *Land Use*

6.2.19 Local Plan Policy AAP 5 *Density and Use of Development* requires development on these allocated sites to be in general conformity with the relevant objectives and site development parameters set out in the plan.

6.2.20 The vast majority of the application site is located within a designated Business and Industrial Use area. Only the very southern part of the site lies outside of this. Planning Policy AAP15(B) of the AAP supports proposals for enabling mixed use development on allocated sites in a Business and Industrial area, subject to compliance with various criterion. The below section of this appraisal assesses the current proposal against criteria a, b and c of this policy. It is considered that criteria d, e, f and g of this policy (relating to design, amenity, infrastructure, and servicing, and highway matters) are more appropriately considered within other site specific sections of the report.

**a)** Conforms to the development parameters set out in the site's allocation;

6.2.21 The site allocation expects the leading land uses on this site to be Office (Class B1) and / or Industrial (Class B2) and supporting land uses to be Enabling residential (Class C3) and / or Training / education (Class D1) and / or Student accommodation (Sui Generis). The subject application proposes a number of land uses that the AAP seeks to achieve (residential and office use). However, the balance of these uses is not in accordance with the AAP parameters, insofar as the proposal is mainly for a residential scheme.

**b)** Will secure the retention, renewal or intensification of appropriate levels of business and industrial employment, in particular the delivery of accommodation to meet the needs of small and medium sized businesses and industrial enterprises;

6.2.22 The employment space on the application site is industrial in nature. The parcel of land on the eastern side of the flyover contains workshop buildings which accommodate three distinct car-related uses: a car rental business, a car body shop and a car repair garage undertaking servicing and MOT testing of vehicles, and the parcel of land on the western side of the flyover contains vacant workshop buildings (B2 use), and two buildings used for commercial food manufacturing and catering business (B2 use). As a whole, 2,412 sqm of employment floorspace is provided on the site, although it is noted that a number of the buildings on the application site are vacant, and have been for some time.

6.2.23 The current planning application seeks to deliver office floorspace and flexible commercial / community floorspace. This would result in a significant shift in the nature of employment space at this site. The proposed office floorspace

would be delivered in the Hub building which would front Masons Avenue. The proposal shown on the revised floorplans would provide 1,165 sqm of contemporary, flexible office floorspace for individuals, small to medium sized businesses and start-up companies, which planning policy AAP 15 seeks to provide accommodation for.

- 6.2.24 In addition to the proposed Hub building, the proposal includes the provision for 695 m<sup>2</sup> flexible retail / commercial / community floorspace (use classes A1, B1, D1, D2) in six separate units within parts of the ground floor of blocks A and B (western side of the flyover) and C and E (eastern side of the flyover). Unlike the existing industrial uses on the site, it is considered that these proposed units would assist the evening economy, increase levels of natural surveillance and would help to create a vibrant community. The proposed units are considered to be of a size that would complement the role and function of the town centre, rather than detract from it. In this regard, it is considered that the type and scale of proposed employment floorspace would be suited to the location of the site and would provide a qualitative improvement in employment land.
- 6.2.25 It is acknowledged that the applicant proposes a lower amount of employment floorspace than what currently exists on the site. However, the revised Economic Statement advises that up to approximately 150 jobs would be created by the proposed development (within the Hub building and the six individual ground floor units). This is significantly higher than the 31 jobs that the site currently delivers (according to the submitted Economic Statement). To this end, it is considered that the application proposes a quantitative improvement in employment land.
- 6.2.26 Notwithstanding these qualitative and quantitative improvements, it is acknowledged that the proposed development would effectively remove this site from the Councils protected Business and Industrial Use employment land. It is noted however that the Harrow Employment Land Review (2010) concludes that 'there appears to be significant potential for new office development on town centre sites and as part of mixed-use developments, but less scope for industrial/warehousing space'. The Core Strategy therefore envisages such a shift / transition in order to facilitate the wider regeneration of Wealdstone.
- 6.2.27 Having regard to the above, it is considered that the employment uses proposed on the application site would be wholly appropriate and would reflect the aspirations of the Core Strategy and the AAP, and would provide for a 'strong business community' within Wealdstone.
- c)** Limits the enabling use component of the scheme to that necessary to secure the delivery of the type and quantum of employment floorspace to be provided;
- 6.2.28 As discussed in section (a) above, the proposal is for a residential-led development. As such, the enabling component is not being limited to that necessary to secure the delivery of the employment floorspace. As discussed in section (b) above, the proposal is delivering a type and quantum of



employment floorspace that is considered to be appropriate to the site. Whilst the proposals are therefore not in full compliance with the AAP parameters, the overall re-provision of employment generating uses arising from the proposals is considered to be acceptable on balance.

6.2.29 As stated, it is considered that criteria d, e, f and g of this policy (relating to design, amenity, infrastructure, and servicing, and highway matters) are more appropriately considered within other site specific sections of the report.

- *Development Height*

6.2.30 Local Plan Policy AAP 6 *Development Height* requires development on allocated sites to be guided by the parameters set out for each site in Chapter 5 and the relevant requirements of Local Plan Policy AAP 6. The site allocation in Chapter 5 expects the maximum height for buildings on the application site to be 6 storeys. It does not rule out additional storeys but states that additional storeys require 'special justification based upon additional outcomes or architectural / design considerations'. The subject application seeks to exceed this suggested building height and proposes building heights to be a maximum 17 storeys.

#### Assessment of Material Planning Considerations

6.2.31 The applicant considers that the proposal complies with the Development Plan for Harrow. However, given the proposed balance of uses and the proposed storey height, the Local Planning Authority is of a different view and considers that the proposal represents a departure from the development plan. Therefore, planning permission should only be granted if other material considerations exist to allow a departure from adopted policy, in accordance with S.38 (6) of the Planning and Compulsory Purchase Act 2004. It is considered that material circumstances do exist to justify the proposed development. These comprise:

- *Opportunity Area*

6.2.32 The subject site is located within the Heart of Harrow which encompasses Harrow town centre, Wealdstone town centre, the Station Road corridor linking these two centres, and the industrial land and open spaces surrounding Wealdstone, including the Kodak site, Headstone Manor and the Harrow Leisure Centre. Following the 2015 consolidation of the alterations to the London Plan since 2011, the designation of Heart of Harrow has been changed from that of an Intensification Area to an Opportunity Area. The London Plan states that 'Opportunity Area are the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvement to public transport accessibility' (par 2.58). This new designation offers significant opportunity for urban renewal and regeneration to provide a stimulus to regenerate Wealdstone and rejuvenate Harrow town centre. The Opportunity Area designation is expected, through higher density residential and mixed-use development on key strategic sites (including the application site) to contribute to the delivery of 3,000 jobs and a minimum of 2,800 new

homes within the Area. Pursuant to the delivery of the spatial strategy for London, Policy 2.13 *Opportunity Areas and Intensification Areas* of the London Plan requires development proposals to:

- *support the strategic policy direction for the Area;*
- *optimise residential and non-residential output and provide necessary infrastructure;*
- *contribute to meeting (or exceeding where appropriate) the Area's employment and housing outputs;*
- *promote inclusive access including cycling and walking; and*
- *support wider regeneration.*

As demonstrated throughout this appraisal, the proposed redevelopment of this site would realise each of these aspirations.

- *Housing Zone*

6.2.33 In June 2014, the GLA produced a prospectus on Housing Zones which was informed by the then draft Mayor's London Housing Strategy (LHS) (which was formally adopted in October 2014). The intention of this was to help boost housing supply in London in recognition of the projected population growth anticipated during the plan period. In all, a total of 20 Housing Zones are expected over a ten year period which would help deliver 50,000 new homes as part of the Mayor's efforts to double house building in London, including supporting 250,000 Londoners into low cost home ownership, through part rent, part pay, over the next decade. The Government and the GLA are jointly committing funding of £400m (in the form of repayment investment, flexible funding and grant) for the 20 Housing Zones to help realise this vision. The consolidated London Plan 2016 sets out under policy 8.1B that the Mayor will work with the Government on implementing initiatives to realise the potential of large development areas through these Housing Zones.

6.2.34 Bids from London Authorities were invited in September 2014. In February 2015, the Mayor announced London's first 9 Housing Zones, of which the London Borough of Harrow was a successful bidder. The entire Heart of Harrow Opportunity Area is now designated as a Housing Zone. It is envisaged that this will help unlock and accelerate the delivery of more than 5,000 new homes over the next ten years, and that this will be achieved through targeted investment, engagement and planning. This figure of 5,000 new homes is almost double the number of homes envisaged in the AAP. Housing Zones are designed to work flexibly depending on the local circumstances, and new homes are expected to come forward in a master planned approach, delivering strong communities through urban design and achieving coherent neighbourhoods. All new development in Housing Zones is expected to deliver successful place-making and secure residential and mixed use development of a high standard.

6.2.35 The applicant, Origin Housing, is one of the Council's delivery partners and with the support of the GLA is seeking to unlock and accelerate significant housing delivery within the Heart of Harrow Housing Zone. Indeed, planning permission was recently granted at two of the applicants sites in the Borough: the Cumberland Hotel (123 residential units in 2015) and Townsend House and Eaton House (116 residential units in 2016). The application (as revised)

proposes 186 residential units, which is almost double the target outputs for the total allocated site at Palmerston Road / George Gange Way (95 homes). Of the 186 homes proposed, 74 of these would be affordable homes which equates to a 40% provision. The delivery of such a high level of affordable housing is welcomed by the Housing Enabling team, particularly as this would assist their efforts to address the impacts of the current housing crisis.

6.2.36 The extent of the housing crisis is well documented. An under-supply and over-demand of homes has created a housing market inaccessible to many of London and indeed Harrow's residents. The current application proposes 46 new shared ownership units and it is considered that this would assist low and middle income households towards home ownership in the Central Wealdstone area.

6.2.37 It is further considered that the provision of 28 new affordable rented housing units would assist the Council to address recent significant increases in homelessness. In Harrow, the extent of the homelessness crisis can be demonstrated by the growth in the number of homeless households housed in Bed and Breakfast temporary accommodation which rose from 5 in March 2010 to 286 in March 2016. This in turn has placed great pressures on Council budgets and there is no immediate sign of a fundamental reduction in homelessness pressures.

6.2.38 Overall, it is considered that the current proposal would make a valuable contribution towards the delivery of target housing outputs including affordable housing units for the Heart of Harrow Opportunity Area, a designated Housing Zone.

- *Delivery towards the Regeneration Agenda*

6.2.39 The NPPF reaffirms the Government's commitment to securing economic growth. Paragraph 21 of the NPPF advises that, when drawing-up Local Plans, local planning authorities should (amongst other things):

- set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
- set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; and
- identify priority areas for economic regeneration, infrastructure provision and environmental enhancement.

6.2.40 This advice is reflected in the London Plan's designation of intensification and opportunity areas and as taken forward in Harrow's Core Strategy and Area Action Plan (AAP) for Harrow & Wealdstone – the 'Heart of Harrow'. Core Strategy Policy CS1 P supports mixed use development where this secures employment generating development and diversification of Harrow's economy.

6.2.41 Although not a part of the Local Plan, it is notable that the Council has recently published a Regeneration Strategy for the period 2014-26. The Strategy sets out the following three core objectives.

- *Place: providing homes and infrastructure needed by the population and*

*high quality town centres that attract investment and fosters community engagement.*

- *Communities: creating new jobs and breaking down barriers to employment*
- *Business: reinforcing commercial centres, promoting Harrow as an investment location, addressing skills shortages and developing local supply chains through procurement*

6.2.42 In addition to this, the Local Development Plan identifies Wealdstone as a focus for growth and regeneration. The Core Strategy envisages that housing led regeneration will support the physical renewal of the High Street and enhance the links with the wider business and industrial capacity of the area.

6.2.43 The Heart of Harrow includes major parts of Greenhill, Marlborough and Wealdstone wards. DCLG indices of deprivation (2011) indicate a relatively high level of Multiple Deprivation in these wards, especially Wealdstone, which exhibits some of the highest levels of deprivation (Income, Health and Disability; and Education/Skills and Training) within Harrow and nationally. These wards also experience the lowest life expectancy in the Borough.

6.2.44 Wealdstone has a strong industrial past. However, the District Centre has seen a decline in more recent years and is currently under-performing. It has a generally low-key character and limited retail offer. The centre's public realm is functional but not of high quality. While traffic calming across much of the High Street has helped pedestrian movement within the town centre it, along with the railway line, has constrained pedestrian movement east and west of the High Street, severely restricting the area's engagement with the adjacent residential areas. Wealdstone town centre is partially by-passed as a consequence of two distributor roads - George Gange Way and Ellen Webb Drive. It is considered that George Gange Way, in particular, acts as a barrier to pedestrian permeability between Wealdstone town centre and the immediate neighbouring industrial and residential area to the east. This in turn poses a significant challenge to the regeneration of Wealdstone.

6.2.45 As concluded at a later stage of this report, it is considered that the proposal would introduce a high quality development into Wealdstone District Centre. It would include new public realm which has a strong potential to strengthen connectivity within Wealdstone and would positively relate to the George Gange Way flyover. The proposal would make a valuable contribution towards the delivery of target housing outputs for the Heart of Harrow Opportunity Area, the Borough and for London. The psychological impact of the proposed development on future potential investors cannot be quantified. However it is considered that the provision of a high quality development on a highly conspicuous site close to Harrow and Wealdstone Station would help to increase confidence in the District Centre (and indeed the Borough) as a place to invest.

6.2.46 The potential employment yield of the non-residential floorspace within the proposed development has been estimated by the applicant to be up to 150 employees. The proposal would therefore make a welcome contribution to the provision of additional employment opportunities within the Heart of Harrow. In

addition to this, the development would also make a valuable economic contribution to the construction sector, albeit in the short term.

6.2.47 Part of the proposed development is to create a Hub building which would front Masons Avenue. The proposal is for this building to provide contemporary, flexible workspace for individuals, small businesses and start-up companies. Generally, these types of employment spaces operate on the basis of a membership system with different levels of membership available depending on the level of services required. The main advantage of this business model is the flexibility that is provided to members/occupiers compared to the costly alternative of leasing business accommodation. In addition to job creation, this proposal has the potential to cater for a need that is not currently provided for in the area. It is considered that this in turn will assist the regeneration agenda for Wealdstone District Centre. It is proposed to include in the section106 agreement, a Planning Obligation to require the developer to submit an Employment Management Plan to the Council for written approval. The Employment Management Plan shall include information on how the building itself will be managed, plans showing the layout of the building and information of the services that will be offered to the occupants/businesses.

6.2.48 In accordance with Harrow's Planning Obligations SPD, the Council's Economic Development Unit has requested a contribution from the development to fund local employment and training programmes. Such a contribution is considered necessary to ensure that the proposal contributes effectively to the Borough's wider regeneration objective. It is therefore recommended that appropriate provisions be made as part of a Planning Obligation.

6.2.49 In accordance with Harrow's Planning Obligations SPD, the Council's Economic Development Unit has also 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. Such provisions are considered necessary to optimise the local economic benefits of the construction phase of the development.

6.2.50 As a whole, it is considered that the proposed development will deliver a scheme that will accord with the core objectives of the Regeneration Strategy (2014 - 2026) and the Local Development Plan, and it is envisaged that this will ultimately act as a catalyst for regeneration in Wealdstone District Centre.

- *Conclusion of Material Considerations*

6.2.51 The application site is located within a designated Opportunity Area and Housing Zone, where the primary focus is for residential development. Notwithstanding this focus, the delivery of mixed use development is supported and the creation of sustainable communities is expected. As set out above, the proposed mixed use development will not only deliver new homes in Harrow, but it will also secure the renewal of appropriate employment levels on this site. It is considered that the proposed development will deliver a scheme that will act as a catalyst for regeneration in Wealdstone, and ultimately deliver a sustainable community. The proposals will need to be carefully managed to

ensure that at operational phase the development creates a thriving, sustainable and successful new place in this part of Wealdstone. Officers are satisfied that this can be achieved through the range of S106 interventions and conditions proposed to be included with any decision to grant consent.

- 6.2.52 The Environmental Information submitted in support of the application does not suggest that there is a specific reason why the balance of the proposed uses or the proposed building height would not be acceptable in principle. In his Stage 1 response, the Mayor of London has advised that he ‘supports the proposed employment offer in strategic planning terms’ and ‘strongly supports’ the delivery of high quality, high density housing as it would increase housing supply and deliver the urban renewal of Wealdstone town centre.
- 6.2.53 The location of the site within the Heart of Harrow (an Opportunity Area and a Housing Zone), the delivery of a high quality scheme that would exceed the expected outcomes of the AAP and the delivery of a scheme that would assist towards the delivery of the Councils Regeneration agenda are considered to amount to material planning considerations to justify the proposal for a residential-led development on this allocated site.
- 6.2.54 The site allocation in Chapter 5 expects the maximum height for buildings on the application site to be 6 storeys, and states that additional storeys require ‘special justification based upon additional outcomes or architectural / design considerations’. Again, the location of the site within the Heart of Harrow (an Opportunity Area and a Housing Zone), the delivery of a scheme that would exceed the expected outcomes of the AAP and the delivery of a scheme that would assist towards the delivery of the Councils Regeneration agenda are considered to be material considerations in relation to the consideration of the proposed building heights. The delivery of 186 residential units including 40% affordable housing units is an additional outcome that carries significant weight. As concluded at a later stage of this report, it is considered that the proposal is for a high quality development that would deliver gateway buildings to Wealdstone which would assist to improve the identity of this area. The additional outcomes and architectural / design qualities of the proposed development are therefore considered to justify the proposal for buildings beyond six storeys on the application site.
- 6.2.55 The proposal represents a departure from the Local Plan. Combined with the other plan-led benefits of the proposal – most notably the delivery of high quality housing including affordable housing and the delivery of a scheme that would assist towards the delivery of the Councils Regeneration agenda – it is considered that the departure from the plan is acceptable in this instance and the proposed development of the site would contribute to the broader objectives and vision for the Heart of Harrow.

#### Town Centre Policy

- 6.2.56 London Plan Policy 4.7 *Retail and Town Centre Development* states that the scale of proposed retail, commercial, culture and leisure development should be related to the size, role and function of the town centre. Core Strategy Policy CS1 L directs proposals for convenience retail, and non-major

- comparison retail, commercial and leisure development to district and local centres, where they are compatible with the role and function of the centre. Local Plan Policy AAP 3 *Wealdstone* requires development within all three Wealdstone sub areas to strengthen the district centre including the High Streets vibrancy and vitality, and to improve the environment and identity of Wealdstone as a location for business and industrial activity, and for family living.
- 6.2.57 The parcel of land on the western side of the flyover is located within a non-designated parade in Wealdstone District Centre. The parcel of land on the eastern side of the flyover lies outside of the District Centre. The proposal includes the provision for 695m<sup>2</sup> flexible retail / commercial / community floorspace (use classes A1, B1, D1, D2) within parts of the ground floor of buildings A and B (western side of the flyover) and C and E (eastern side of the flyover).
- 6.2.58 Policy AAP18 supports the provision of town centre, community and economic uses at ground floor level within non-designated parades in Wealdstone District Centre, provided there is no impact on neighbouring amenity and provided an appropriate frontage is provided. As concluded in a later section of this report, the proposed flexible retail / commercial / community use would not detrimentally impact on neighbouring amenity and as such this aspect of the proposal is considered to be acceptable.
- 6.2.59 The parcel of land on the eastern side of the flyover lies outside of the District Centre. It is an edge-of-centre site, as defined by the glossary of the Development Management Policies Local Plan. A combined floor area of 376.9m<sup>2</sup> flexible retail/commercial/community floorspace is proposed on this part of the site (edge-of-centre). Since the floorspace would not exceed 2,500 m<sup>2</sup>, neither a sequential test nor an impact test is required. The proposed individual units on the eastern side of the flyover are considered to be of a size that would complement the role and function of the town centre, rather than detract from it.
- 6.2.60 It is considered that the provision of flexible retail/commercial/community floorspace on the eastern side of the flyover would assist to unify the two parcels of land at each side of the flyover. It would assist to increase footfall beneath the flyover, thereby creating an active piece of public realm on a piece of land that is currently unpleasant. To this end, the proposal would assist to create a strengthened and coherent piece of public realm and would contribute to the creation of a Lifetime Neighbourhood.
- 6.2.61 London Plan Policies 4.8 *Supporting a Successful and Diverse Retail Sector and Related Facilities and Services* and 4.9 *Small Shops* point to the value of local facilities/services, markets and small shops as part of vibrant, diverse retail sector. The importance of diverse retail and related activities is amplified further in the Mayor of London's *Town Centres* SPG (2014). Local Plan Policy DM 41 *Evening Economy* supports proposals which enhance the evening economy of town centres.

- 6.2.62 The 'centre of gravity' for mainstream retail purposes in Wealdstone District centre is likely to remain High Street, meaning that the role of retail/commercial floorspace at the application site would be likely to be a complimentary one. The proposal therefore builds-in flexibility in terms of the size range of the proposed commercial units and in terms of the range of uses for which planning permission is sought.
- 6.2.63 It is noted that the provisions of the Town and Country Planning (General Permitted Development) Order 2015 provides relaxation of local planning authorities' control over changes within the A Class uses. It is considered necessary to apply a condition to any planning permission with regards to any future changes of use of the proposed commercial floorspace.

### 6.3 HOUSING OUTPUT

#### Affordable Housing

- 6.3.1 The NPPF defines affordable housing as: social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Intermediate housing is defined as homes for sale and rent provided at a cost above social rent but below market levels.
- 6.3.2 London Plan Policy 3.12 *Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes* states that the maximum reasonable amount of affordable housing should be sought from individual proposals and negotiations should take account of the circumstances of the proposal including viability. The policy also establishes a clear expectation that affordable housing would be provided in the following sequential approach: on-site; off-site; or cash in-lieu contributions. Cash in-lieu contributions should only be accepted where this would demonstrably further the Plan's affordable housing and other policies.
- 6.3.3 The London Plan's housing policies are supplemented by the Mayor's *Housing SPG* (2016). In relation to affordable housing policies, the tone of the SPG is to further emphasise the need for policies to be applied in a manner that maximises output and, having regard to viability, to encourage not restrain housing development.
- 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 having regard to the following considerations:
- the availability of public subsidy;
  - the need to promote housing choice;
  - the provision of family housing;
  - the size and type of affordable housing required;
  - site circumstances and scheme requirements;
  - development viability; and
  - the need to meet the 40% Borough-wide target.



6.3.5 In terms of tenure split, the strategic part of London Plan Policy 3.11 *Affordable Housing Targets* calls for 60% of affordable housing provision to be for social and affordable rent and for 40% to be for intermediate sale or rent. Paragraph 4.104 of the AAP Local Plan document confirms that this tenure split will be applied throughout the Heart of Harrow, except within the Wealdstone Central sub area where the reverse tenure split is required (60% for intermediate sale or rent and 40% for social and affordable rent) under policy AAP13(C). The reason for this is that the dominant form of housing provision in the Wealdstone Central sub area over recent years has been social affordable housing. This particular policy seeks to address this imbalance in order to achieve a mixed and balanced community.

In terms of dwelling mix, London Plan Policies 3.11 and 3.12 both make reference to the priority that should be accorded to the provision of affordable family housing. Policy DM24 of the Development Management Policies Local Plan requires development proposals to secure an 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; the priority to be afforded to the delivery of affordable family housing; and the location of the site, the character of its surroundings and the need to optimise housing output on previously developed land.

6.3.6 During the course of the planning application, the number of proposed residential units was reduced from 187 units to 186. The reason for this was the need to accommodate adequate refuse storage in a manner that would be convenient for refuse management on site without visually impacting on the public realm. It was considered that the ground floor part of block E would be an appropriate location for refuse storage. The impact of this is the loss of a two-bedroom, affordable rented unit.

6.3.7 The revised proposal is for 74 of the proposed 186 homes to be provided as affordable homes equating to a proportion of 40%. An affordable housing statement has been submitted with the application. Details of the proposed affordable tenure split and dwelling mix, which are as follows:

**Table 1: Affordable Housing Tenure Split and Dwelling Mix**

	<b>1 Bedroom</b>	<b>2 Bedroom</b>	<b>3 Bedroom</b>	<b>Totals</b>
<b>Affordable Rent</b>	4 (14%)	17 (60%)	7 (25%)	28 (37%)
<b>Intermediate</b>	20 (43%)	26 (56%)	-	46 (62%)
<b>Totals</b>	24 (32%)	43 (58%)	7 (9%)	74 (100%)

### *Consideration of the Proposal's Affordable Housing Offer*

- *The availability of public subsidy*
- 6.3.8 The applicant has submitted a Viability Assessment in support of the proposal's affordable housing offer. The Assessment concludes that the development is marginally viable at current day costs and values and taking account of estimated CIL payments as well as the provision of 40% affordable housing. The submitted Viability Assessment states that Origin (the applicant) anticipate social housing grant input towards the Affordable Rent units and the Intermediate units.
- *The need to promote housing choice*
- 6.3.9 The development would deliver the proposal's affordable housing contribution on-site, in accordance with the expectations of the London Plan. The Council's Homes for Harrow and estate renewals projects, together with new developments elsewhere within the Borough, will add to the existing stock of more traditional homes in suburban areas. The proposed provision of contemporary flats would make a welcome addition to affordable housing stock by extending choice to those seeking an affordable home within an urban environment.
- *The provision of family housing*
- 6.3.10 The proposal does not make provision for three bedroom private market flats, which is regrettable. Nonetheless, officers are confident that there will remain a high demand for one and two bedroom flats in this location for private market units. Seven three bedroom affordable rented units are proposed, which equates to 25% of the affordable rented provision and 9% of the overall affordable housing provision.
- *The size and type of affordable housing required*
- 6.3.11 This site is located within the Wealdstone Central Area of Harrow and in this particular area, policy AAP13 of the Area Action Plan seeks a tenure split of 40% affordable rented homes and 60% to be made available as intermediate homes - this is a specific planning policy relating to the Wealdstone Central Area of Harrow. Officers are satisfied that the development would broadly accord with this target split (37% / 62%), as far as practicably possible, given the design, estate and tenure management issues associated with the development.
- 6.3.12 It is noted that the proposed affordable housing dwelling mix would not comply with the target mix sought in Harrow's Planning Obligations SPD. However it is noted that the proposal is supported by the housing enabling team, mainly because of the high affordable housing offer. Nonetheless, the housing enabling team have expressed some disappointment that the affordable rented tenure offers the majority of 2 bedroom homes as 3 person, whereas the Council's priority demand is for 2 bedroom 4 person.
- 6.3.13 As noted under the *development viability* section below, officers consider that it is appropriate to seek to review the viability of the scheme at key points during the construction of the development and to seek additional contributions to

affordable housing provision, where appropriate. It is considered that the first preference, in the event that viability review supports such additional contributions, should be for the provision of some 2 bedroom 4 person flats within the development.

- *Site circumstances and scheme requirements*

6.3.14 The proposal would meet the Local Plan design requirements for high quality architecture and high quality public realm on the site. It would also deliver high quality employment floorspace, and in particular it would deliver a high quality Hub building for start-up businesses. It is acknowledged that these elements have a bearing upon overall development viability.

- *Development viability*

6.3.15 The revised proposal is for 74 of the proposed 186 homes to be provided as affordable homes equating to a proportion of 40%. The submitted viability information concludes that the proposal, incorporating this level of affordable homes, would result in a 'marginally viable' scheme. The GLA, in their stage 1 response, have called for a robust assessment of the proposed housing offer.

6.3.16 The applicant's assessment has been the subject of independent appraisal by consultant BNP Paribas Real Estate on behalf of the Council ("the Council's independent appraisal"). BNP Paribas has scrutinised the applicant's Viability Assessment. Further to this, Bond Davidson were appointed to scrutinise the construction costs. As such, a robust assessment of the viability information has been undertaken.

6.3.17 The Council's independent consultant has reviewed the scheme and considered the input and assumptions to be broadly fair, albeit the scheme would result in a marginal financial surplus, and recommends a review of scheme viability at an appropriate point in the development programme, and to seek additional contributions to affordable housing provision if appropriate in light of that review. London Plan Policy 3.12 makes reference to the re-appraisal of scheme viability and the Mayor's SPG provides further amplification, referring to such provisions as contingent obligations. Harrow's SPD also sets some expectations as to the use of such review mechanisms. It is considered necessary to require a review of scheme viability at an appropriate point in the development programme, and to seek additional contributions to affordable housing provision if appropriate in light of that review. Planning obligations to this effect are, therefore, recommended.

6.3.18 Further to this, Officers consider that the surplus (£55,000) shown on the independent appraisal should be secured towards off-site affordable housing and a planning obligation to this effect is also recommended.

- *The need to meet the 40% Borough-wide target*

6.3.19 The 40% Core Strategy target is a Borough-wide target for delivery of new housing over the plan period and is not a site specific target. Nevertheless, the target is a useful indicator of the performance of development in terms of delivering new affordable homes within the Borough. The submitted Financial Viability Assessment, which has been robustly tested by the LPA, shows that the scheme would deliver the 'maximum reasonable amount' of affordable

housing, subject to the recommended obligations, and thereby meets the policy requirements of the Development Plan.

*Conclusion of the Proposal's Affordable Housing Offer*

- 6.3.20 Subject to the above mentioned planning obligations, officers consider that the proposed affordable housing offer (40%) is the maximum that the site can support at the present time (alongside delivery of the other infrastructure outcomes required). The proposal would deliver much needed Affordable Rented units and Shared Ownership units. To this end, the development would accord with the aims and objectives of the Development Plan in respect of affordable housing.

Housing, Supply, Density and Overall Housing Mix

- 6.3.21 Paragraph 48 of the NPPF states that local planning authorities that housing applications should be considered in the context of the presumption in favour of sustainable development.
- 6.3.22 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. In this regard, it should be noted that, following the recently adopted further alterations to the London Plan, London's annual housing monitoring target has increased from 32,210 to 42,389 homes p.a. and this includes Harrow's target which has increased from 350 p.a. to 593 p.a. For Harrow, this translates into a new ten year target to deliver 5,927 homes (Table 3.1 of The London Plan 2016). As noted elsewhere in this report, the further alterations to the London Plan acknowledge the growth potential of Harrow and Wealdstone by upgrading its status from that of an intensification area to one of an opportunity area. The proposal's 186 new homes would make a contribution equivalent to almost 7% of the 2,800 homes target for the opportunity area.
- 6.3.23 London Plan Policy 3.4 *Optimising Housing Potential* seeks to optimise housing output from development by applying the sustainable residential quality density matrix at Table 3.2 of the Plan. Local Plan Policy AAP 5 *Density and Use of Development* states that residential development proposals should achieve densities within the appropriate London Plan density range. The site is located in an urban area with a high public transport accessibility rating (5) and, therefore, housing output at the upper end of the density matrix (200 to 700 habitable rooms per hectare) is to be expected.
- 6.3.24 The applicant's planning statement advises that the density of the proposed development would be 720 habitable rooms per hectare, and this figure is also referred to by the GLA in its stage one consultation response. Paragraph 3.28 of the reasoned justification to Policy 3.4 is 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 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 its contribution to the Councils regeneration agenda, the location of the site within the Heart of Harrow (a designated Opportunity Area and a Housing Zone), and the delivery of a high quality scheme, and are appraised elsewhere in this report. GLA officers have advised that they are satisfied with the density proposed.

6.3.25 Paragraph 50 of the NPPF states that local planning authorities should plan for a mix of housing, based on demographic and market trends, and the needs of different groups, and that they should identify the size, type, tenure and range of housing that is required in particular locations. This approach is reflected by Policy 3.8 of the London Plan relating to Housing Choice. Consideration of the proposed affordable housing mix is set out in the preceding section of this report.

6.3.26 The Council has not prescribed a housing mix for market housing in the Local Plan, preferring instead to advocate flexibility to respond to circumstances including the location and nature of proposed developments. The applicant's Planning Statement includes details of the proposed market dwelling mix, which are as follows:

**Table 2: Market Housing Dwelling Mix**

Type	Number
1 Bedroom	44 (39%)
2 Bedroom	68 (61%)
3 Bedroom	0 (0%)
<b>Totals</b>	<b>112 (100%)</b>

6.3.27 The absence of three bedroom flats is noted. However, given the accessible location and high density nature of the proposal, a substantial proportion of one and two bedroom flats is accepted. Such homes would be suitable for young professionals and small families.

Thus it is considered that the proposed mix of home types/sizes would respond to the location of the site and the character of its surroundings whilst optimising the housing output of this allocated site within the Harrow & Wealdstone opportunity area. The proposal would add to the supply of contemporary new-build homes in the area. Taken together with the affordable housing component, it is concluded that the proposal would make a positive contribution to the creation of inclusive and mixed communities in Wealdstone District Centre.

## 6.4 TOWNSCAPE AND DESIGN QUALITY CONSIDERATIONS

### Development Height

6.4.1 Local Plan Policy AAP 6 *Development Height* requires development on allocated sites to be guided by the parameters set out for each site in Chapter 5 and the relevant requirements of Local Plan Policy AAP 6. The site allocation in Chapter 5 expects the maximum height for buildings on the application site

to be 6 storeys, and states that additional storeys require 'special justification based upon additional outcomes or architectural / design considerations'. As set out earlier in this report, material considerations are considered to exist to justify the additional building height beyond six storey's. Notwithstanding this conclusion, it remains necessary to consider the impacts of the proposed development height on its surroundings.

6.4.2 It is considered that the principles established by the planning history relating to another site in the borough (No. 51 College Road) are relevant in this instance. In 2008, a planning application was submitted for the redevelopment of a site in Harrow Town Centre (No. 51 College Road) for buildings ranging between 3 and 19 storeys in height. This application was refused by the Council in 2009 for the following reason:

6.4.3 Excessive bulk and mass, scale and intensity would be overbearing, visually obtrusive, detrimental to the character and appearance of the nearby Conservation Area, Area of Special Character and MOL and would appear over dominant in the skyline to the detriment of the long views of Harrow on the Hill by reason of competing with the primacy of the St Mary's Spire, a historic landmark and, when viewed from The Grove Open Space and within the locality, would be detrimental to the views of the Harrow Weald Ridge, contrary to HUDP policies D4, D14, D31 and EP31 and London plan policies 4B.1, 4B.2, 4B.9, 4B.10, 4B.11 and 4B.12.

6.4.4 Following the Council's decision to refuse this application, an appeal was lodged and a Public Inquiry was held in March 2010. The appeal was dismissed by the Secretary of State on 22<sup>nd</sup> July 2010. However, the decision established two key principles in relation to the proposal for a tall building on the site at No. 51 College Road. Specifically:

- there is nothing inherently wrong in being able to see a piece of high quality architecture, even a tall one, within a densely urban scene, and consequently that there is no objection in principle to tall buildings on the site; and
- whilst there would in that case have been a significant change in views, it is important not to conflate visibility and harm.

6.4.5 Although the current proposal relates to a different site and one that is within Wealdstone District Centre rather than Harrow Town Centre, it is considered that similar principles are material to the assessment of the current proposal for tall buildings.

6.4.6 The assessment relating to 'Townscape and Design Quality Considerations' must therefore focus on the merit of the height, form, setting and architectural quality of the tall buildings now proposed

#### Tall Buildings

6.4.7 The framework for the consideration of these aspects of the subject proposal is the London Plan (2016), the Harrow Core Strategy (2012) and the Harrow & Wealdstone Area Action Plan (AAP). Specifically:

- London Plan Policies 7.6 *Architecture* and 7.7 *Location and Design of Tall and Large Buildings*
- Core Strategy Policy CS 2 *Harrow & Wealdstone J*
- Local Plan Policy AAP 6 *Development Height* and the design considerations for AAP Site 6: *Palmerston Road / George Gange Way*

6.4.8 The London Plan defines tall and large buildings as “...those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor”. The Core Strategy defines tall buildings as any building at or over 30 metres and this definition is reproduced at the glossary of the AAP. The AAP makes a further distinction as to ‘taller’ buildings, these being defined as buildings that are two or three storeys higher than the surrounding building heights.

6.4.9 All components of proposed buildings B & C would be in excess of 30 metres in height and would be significantly taller than their surroundings/cause a significant change to the skyline. Accordingly, these buildings constitute ‘tall’ buildings for policy purposes.

6.4.10 Proposed building A ranges from 6.8 to 16.2 metres in height and, in terms of storeys, this equates to a range of between 2 and 5 storeys. Some of the neighbouring buildings have similar heights, namely Birchfield House and Station House on Masons Avenue are 5 storeys and 3 storeys with habitable roof space respectively. However, other buildings in the immediate vicinity of proposed building A are generally only two storeys in height. Taking this very varied context in the round, it is considered proportionate to assess proposed building A as a ‘taller’ rather than a ‘tall’ building for policy purposes. In the context of the prevailing two-storey building heights surrounding building E (four storeys), it is also considered appropriate to assess proposed building E as a ‘taller’ building,

6.4.11 This section of the report focuses on the proposed tall buildings, blocks B and C. Core Strategy Policy CS 2 requires the Council to establish a policy framework for tall, landmark buildings within the Heart of Harrow. That commitment has been fulfilled by the provisions of Policy AAP 6. London Plan Policy 7.7 states that applications for tall or large buildings should include an urban design analysis. Such an analysis has been provided with the subject application, in the form of the Design & Access Statement (D&A) and a Visual Impact Assessment (VIA). The criteria in Policy 7.7 and in Local Plan Policy AAP 6, together with the site specific design considerations listed at AAP Site 6, generate multiple and occasionally overlapping considerations to be applied to the assessment of the proposed tall buildings. These are addressed below.

- *Location and Landmark*

6.4.12 The London Plan provides a clear direction for tall buildings to be located in certain designated areas, including town centres with good public transport accessibility and intensification/opportunity areas. The Local Plan states that proposals will only be considered acceptable if they represent ‘landmark’ buildings and that they should be located to draw attention to locations of civic

importance, major public transport interchanges and areas of important public realm (Policy AAP6.D.a). The site allocation calls for a 'visible collection of prominent high quality gateway buildings to Wealdstone that improve identity for this area'.

6.4.13 The proposed tall buildings are considered to be locationally appropriate. They would provide a visual identifier of the District Centre and would be located less than 200m from Harrow and Wealdstone Station, a major driver of pedestrian activity in Wealdstone and a central part of daily life for many residents.

6.4.14 In addition to this, the proposed tall buildings would also be a marker for the development itself. They would be a highly visible asset within the Heart of Harrow that would contribute positively to the legibility and identity of the area. The development would create new public realm which along with serving the proposed development, would create a new traffic-free, pedestrian-friendly walking route within Wealdstone. To this end, it is considered that the proposed development would provide a high-quality environment which would benefit the quality of life for residents of the proposed development and the district centre as a whole.

- *Height, Form and Setting*

6.4.15 The London Plan states that tall and large buildings should only be considered in areas whose character would not be adversely affected by the scale, mass or bulk of the proposal, and that they should relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm, particularly at street level. The Local Plan provides specific direction as to the height, form and setting sought in respect of tall building proposals. Namely, that they should:

- be slender and elegant in design, tiered and stepped where necessary to further reduce bulk, and not slab-like when viewed from any direction;
- create a simple and legible building profile that enhances and adds visual interest to the skyline;
- contribute to the overall townscape, both during the day and night, and achieve a positive relationship with surrounding topographical features and buildings at all sides;
- incorporate a high quality urban realm fronting the tall landmark; and
- secure a complete and well-designed setting at street level, including active ground floor uses, and positively define the character of the public realm.

6.4.16 Wealdstone town centre is partially by-passed as a consequence of two distributor roads - George Gange Way and Ellen Webb Drive. It is considered that George Gange Way, in particular, acts as a barrier to pedestrian permeability between Wealdstone town centre and the immediate neighbouring industrial and residential area to the east. This in turn poses a significant challenge to the regeneration of Wealdstone. In order to address this and other site constraints (such as the proximity of the site to a roundabout; the presence of a culvert traversing the site and irregular site



boundaries), the current application proposes to site a tall building at each side of the flyover. The intention of this design approach is to provide a prominent 'gateway' to Wealdstone which responds well to the flyover and raises the profile of the district centre, as required by the AAP. This particular design solution has been put forward following consideration of separate development proposals on each side of the flyover and various alternative building heights, massing and building forms. Each of these alternatives have been discounted in favour of providing a permeable, pedestrian-friendly site layout (which includes the space under the flyover) with prominent 'gateway' buildings. These alternatives are documented in the submitted Design and Access Statement.

- 6.4.17 Wealdstone district centre is essentially Victorian/Edwardian in origin and some two storey buildings from this period survive, much altered, in the High Street and Canning Road. However the High Street is very mixed in character including some three storey 1930s parades and 1960/70s redevelopment. Taller buildings in the centre comprise Premier House, a 1980s office tower to a height of five storeys, and more recent high density residential development at Grant Road (up to six storeys) and High Street/Palmerston Road (five storeys). Red brick is the predominant material used, and building lines vary at the upper level reflecting the different periods of development. Buildings B and C would range between nine and seventeen storeys in height. They would be distinctly higher than other buildings in Wealdstone District Centre and the surrounding area. They would result in a significant juxtaposition in scale when viewed in the context of the predominant two to three storey buildings in Wealdstone, and would represent distinctive features in the skyline. The Councils Design Officers have advised that they are 'supportive of the increased height and are of the opinion that the context can support tall buildings'. GLA Officers have advised in their stage 1 report that they are satisfied that the proposed scale is acceptable in strategic planning terms.
- 6.4.18 Policy AAP 6 of the Local Plan requires that, where a proposal for a tall landmark building includes the development of other buildings on the site, the height of all other buildings shall be significantly subordinate to the tall landmark building. The application addresses this policy requirement by providing a number of buildings across the site which range between one and seventeen storeys. The siting, orientation and layout of these buildings is important to the delivery of a high quality development. The tallest parts of blocks B and C would be located towards the northern site boundary and have been orientated to align with neighbouring development to the east and west of the site, rather than the flyover. Both the GLA and LBH Design Officers consider this to be an appropriate design response as it would create simple and orthogonal spaces along the edge of the site. The reconfiguration of the northern-most commercial unit is block B is considered to have removed a 'pinch point' which had raised concerns. The lower parts of blocks B and C would tier-down towards the southern site boundary, acknowledging the lower scale of existing surrounding development. This tiered arrangement would serve to reduce bulk, and together with the lower heights of buildings A, E and D would introduce a legible and visually interesting profile to the skyline without appearing as a 'cluster' of tall buildings on the site. The arrangement of the proposed building heights would allow the tallest elements to appear as

slender and elegant buildings in the skyline.

6.4.19 Although storey heights would be higher than envisaged in the Local Plan, it is considered that the proposed placing of the highest buildings at either side of the George Gange Way flyover would be an appropriate design response to the constraints posed by this piece of infrastructure. It is considered that the varied building heights across the site and the arrangement of the buildings would provide a high degree of visual articulation and relief, contributing to the overall townscape and adding visual interest to the skyline.

6.4.20 As stated, the site has many physical constraints, most notably the flyover which traverses the site, the roundabout which is located immediately north of the site and the irregular site boundaries. These constraints pose challenges for the delivery of a high quality urban realm fronting the tall buildings. As stated, the tallest parts of blocks B and C would be located towards the northern site boundary. Whilst this would provide some 'enclosure' for the roundabout, as required by the site allocation, it also limits the provision of setting space to serve the proposed tall buildings. In this particular instance, the central part of the site would enjoy the best available spatial setting in order to 'open up' the space beneath the flyover. In terms of place-making, this is considered to be an important opportunity for the site and for Wealdstone. Whilst the proposed site layout would not offer an abundance of space about the tall buildings, it is considered that it would provide legible and comfortable routes through the site, which would be enhanced by proposed landscaping. The proposed provision of flexible retail/commercial/community floorspace on each side of the flyover would assist with pedestrian permeability. As a whole, it is considered that the proposed development would incorporate a high quality urban realm and would secure a complete and well-designed setting at street level, including active ground floor uses.

6.4.21 Overall, it is considered that the height, form and setting of the proposed tall buildings would achieve the objectives of the AAP. It would serve to enclose one side of the Palmerston Road / George Gange Way roundabout and would provide a 'visible collection of prominent high quality gateway buildings to Wealdstone that improve the identity of the area'.

- *Architectural Quality*

6.4.22 The London Plan expects tall and large buildings to incorporate the highest standards of architecture and materials and these principles are reiterated and amplified by Policy 7.6 *Architecture*. The Local Plan similarly calls for tall buildings to be of the highest architectural quality. The Local Plan also states that tall buildings should:

- ensure that façade, treatment and material articulation of the building is well proportioned, visually interesting and well designed with high quality materials, maintaining its attractiveness over the lifetime of the building, and contributes to its overall elegance and legibility; and
- ensure that fenestration is generous, well proportioned and contributes to a sense of coherence and simplicity of form.

- 6.4.23 Blocks B and C would represent the main 'gateway buildings' on the site. In terms of appearance, these blocks would be similar but not identical. Both would have taller elements with lower integrated blocks, providing transition in scale. Notwithstanding their differing storey heights, these blocks would have a similar design and building layout. In particular, these blocks would share the same architectural vocabulary and material palette, namely a substantial stone-clad frame.
- 6.4.24 The submitted Design and Access Statement advises that the proposed frames provide 'order to the façade and structural integrity' and provides 'a degree of flexibility' within the frame. This flexibility is provided in the form of 'irregular but not random' fenestration. The aim of this approach is to afford each flat with 'its own external identity'. It would also allow the proposed lift cores to be distinguished from the flats. Full height window openings are proposed and inset balconies would be provided at the corners of the frames, 'opening up' the corners. The double height ground floor elements would provide a base / visual plinth for the taller buildings.
- 6.4.25 The applicant proposes a single uniform material across the upper floors of these blocks. The purpose of this approach is to avoid over-complicating the appearance of the blocks. Officers agree with this design approach. The applicant proposes to clad the building in stone. Various types of stone and stone cladding systems were considered, and following much discussion, the applicant has indicated that Cenia limestone is the preferred type of stone. The applicant considers that this would have the quality to signal a gateway building to Wealdstone and would be capable of ensuring that the building would be constructed as designed. Brick infill panels are proposed at ground floor level, 'the base' for the taller buildings. This is considered to be an appropriate design response, particularly given the commercial nature of parts of these tall buildings.
- 6.4.26 Two Design Review Panels (DRP's) were convened during the course 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, particularly the proposed tall buildings. It is noted that the letter of conclusion state that 'The panel supports the proposed development concept and recognises the challenges that the site presents. The design team and client are to be commended for their ambition for this scheme, which addresses a difficult set of sites in a coherent manner. The panel believe tall buildings can work in this context but they need to be of very high design quality'. Further to this, the Councils Design Consultant has advised that 'The prominence of the towers requires a robust approach to the design and detailing of the elevations, and the use of high quality natural stone cladding will make a positive contribution to the townscape. The applicant has addressed DRP comments relating to the cladding colour, with the selection of a more contextually sympathetic stone'. On this basis, the Councils Design Consultant considers that the proposed tall buildings would represent 'landmark' buildings, as required by policy AAP6. In terms of architecture, the GLA have advised that the approach (proposed simple building forms, with clean lined detailing, and the use of single pale stone facing material for the two tower elements) 'is broadly supported and that the townscape

visualisations and verified views demonstrate that the buildings would be of high design quality, and would not cause harm to the character or setting of surrounding heritage assets’.

6.4.27 The overall result of the design evolution is considered to be a well-conceived development that would be unique in its surroundings. It is considered that the heights, detailed design and finishes to the proposed tall buildings would certainly represent ‘a visible collection of prominent high quality gateway buildings to Wealdstone’, as required by the site allocation in the AAP. The treatment of the elevations is such that the buildings would be well articulated in terms of vertical emphasis and horizontal subdivisions. Various experts in the design field have considered the scheme and have not raised any objection, subject to appropriately worded planning conditions. Officers are mindful of this expert advice and consider that the proposed tall buildings would be visually interesting and would represent gateway buildings. Taken as a whole, it is concluded that all of the described architectural attributes of the proposed tall buildings point to a development that achieves the bar established in policy for tall buildings of the highest quality of architecture.

6.4.28 Given the importance of the quality of the architecture and finished appearance of the proposal in making the principle of tall building development acceptable on this site, it is considered necessary to ensure that the development is carried out to the standard promised in the application and that, as required by Local Plan policy, it maintains its attractiveness over the lifetime of the development. For this reason the following controls are recommended, as conditions of planning permission: (i) agreement of the materials to be used and any colours to be applied to the external finishes of the proposed buildings; and (ii) agreement of a strategy for maintaining (cleaning, repainting and repairing/replacing) the external surfaces of the building. As a safeguard, it is proposed to include in the section106 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 over the Design Code and in-put and agreement from the Council on the level of architectural expertise retained throughout the construction phase.

6.4.29 Finally, the London Plan requires as part of the consideration of architectural quality that the proposal includes sustainable design and construction practices. These are appraised in a separate section of this report (below).

- *Impact on Surroundings*

6.4.30 The London Plan states that tall buildings should not adversely affect their surroundings in terms of microclimate/wind turbulence, overshadowing, noise, reflected glare, and interference to aviation and telecommunications. These are considered in turn below.

**(a)** Microclimate - Wind Turbulence

6.4.31 An assessment of the wind microclimate has been submitted with the planning application. It considers the impact of the proposed tall buildings on the

pedestrian level wind environment. It considers the primary pedestrian activities on and near the site to be as follows:

- Public realm: pedestrian access, roadways
- Neighbouring private spaces; commercial and industrial sites
- Site: Pedestrian access, recreation and building access

6.4.32 The findings of the assessment are as follows:

- Some areas of the existing site are moderately exposed to prevailing south-westerly winds resulting in discomfort in adverse weather conditions
- The proposed buildings are likely to lead to significant changes to the pedestrian wind climate on the site itself with some limited effects beyond the site boundary. Conditions are likely to remain suitable for pedestrian transit across most areas Block B has the potential to cause some acceleration near its base on Palmerston Road. In extreme storm conditions, this could cause some discomfort and nuisance to the entrance of the adjacent College building.
- Within the site, the majority of the pedestrian access ways are likely to be appropriate for the intended use of the buildings. The recreational spaces under the flyover and to the west of block B would benefit from the additional of street furniture and soft landscaping to improve comfort for site users. No safety issues have been identified due to pedestrian level wind speeds
- A number of building entrances would be exposed to local accelerations and would benefit from being moved to a more sheltered location or being provided with local shelter.

6.4.33 A number of mitigation measures have been put forward within the report. As stated, a number of revisions were carried out during the course of the planning application. An addendum to the wind assessment accompanied the revised drawings. It advises that the introduction of canopies and screens at building entrances will increase comfort close to the doors. These have been included in the revised drawings. Planting of an appropriate height will increase comfort in all areas. Dense planting is recommended at the corners of the highest roof terraces (blocks B and C). Subject to a condition securing the recommended mitigations that would achieve appropriate reductions in wind speeds to relevant areas, it is considered that the proposal's impact upon local wind turbulence would be acceptable.

**(b) Overshadowing**

6.4.34 An assessment of the daylight and sunlight for amenity areas has been submitted with the planning application. The daylight and sunlight components of the assessment in relation to residential amenity are appraised elsewhere in this report.

6.4.35 The BRE recommends that, for an amenity area to be adequately lit, at least 50% of the area should receive at least two hours of sunlight on the 21st March. The report that has been submitted as part of the planning application

states that 72% of the amenity space on the western side of the flyover would receive at least two hours of sunlight on 21<sup>st</sup> March, whilst 73% of the amenity space on the eastern side of the flyover would receive at least two hours of sunlight on 21<sup>st</sup> March. The report concludes that the amenity areas would exceed the BRE guideline recommendations

- 6.4.36 The areas that would receive less than two hours of sunlight on 21<sup>st</sup> March would generally be modest in size and would be located to the north of the site (north of blocks B and C, north and north-east of block E). It is considered that they would serve to complement the larger areas of brighter public realm. As a whole, the proposal would generally provide bright areas of public realm with a smaller amount of shady areas. The proposal is considered to be acceptable in this regard.

**(c) Noise**

- 6.4.37 The noise environment and the noise impacts of the proposed development are appraised elsewhere in this report.

**(d) Glare**

- 6.4.38 No information on glare has been submitted with the application and none was sought by officers. Given the arrangement of the buildings on the site and the proposed materials (brick, stone, or a combination of both), it is considered that the risk of glare occurring would not be significant.

- 6.4.39 To quantify more precisely the extent of the risk of glare and to allow for appropriate mitigation (such as installation of glare-reducing glazing), it is considered that this matter be reserved as a condition.

**(e) Aviation**

- 6.4.40 On 5<sup>th</sup> February 2015 the Department for Communities and Local Government notified the Council of a new safeguarding direction in respect of RAF Northolt. In accordance with the direction, the Ministry of Defence (MoD) has been consulted on the planning application the subject of this report. The MoD responded and has raised no objection to the height of the proposed development.

- 6.4.41 The application site occupies aerodrome height and birdstrike safeguarding zones surrounding RAF Northolt. The MOD recognises that cranes may be used during the construction of tall buildings at this site, which may affect air traffic safety. The MOD has therefore suggested a planning condition requiring a construction management strategy (including details of when and where cranes will be erected) to be submitted prior to the commencement of development on site.

**(f) Telecommunications**

- 6.4.42 Local Plan Policy DM 49 *Telecommunications* requires proposals for major development to make provision for communal satellite and digital television

receiving equipment. The policy is considered particularly important in respect of the proposal, where multiple satellite dishes or other such apparatus could seriously harm the appearance of what would otherwise be a landmark development. It is therefore considered necessary to control the future installation of telecommunications equipment as a condition of any planning permission.

**(g) Impact on Views and Heritage Assets**

- 6.4.43 The London Plan requires tall buildings not to adversely affect local views and that tall buildings proposed in sensitive locations (such as the setting of conservation areas or listed buildings) should be given particular consideration. The need for consideration of the impacts of tall building proposals upon views and heritage assets is reiterated in policy AAP6 of the Local Plan. These issues are appraised in a separate section of this report (below).

*Other Tall Building Considerations*

- 6.4.44 The London Plan states that tall and large buildings should: have ground floor activities that provide a positive relationship to the surrounding streets; contribute to improving the permeability of the site and wider area, where possible; incorporate publicly accessible areas on upper floors, where appropriate; and make a significant contribution to local regeneration. The Local Plan similarly calls for tall buildings to contribute to the overall townscape during the day and night; incorporate a high quality urban realm fronting the tall landmark building, and secure a complete and well-designed setting at street level and positively define the character of the public realm. Many of these requirements are also reflected in the design considerations of the site allocation, which calls for a strengthened spatial definition of this part of Wealdstone and active, non-residential uses to all ground floors.
- 6.4.45 The proposed public realm would not only provide a setting for the proposed buildings at ground floor level, but would also provide a pedestrian route through the site that would in turn assist to increase permeability within Wealdstone District Centre. This is particularly important for the proposal to relocate the Civic Centre.
- 6.4.46 In September 2015, a report went to Cabinet seeking approval in-principle for the relocation of the Civic Centre from the current site to a preferred site in Wealdstone incorporating Peel House Car Park. The report states that an options appraisal report explored a number of viable options, and recommended Peel Road Car Park in Wealdstone as the preferred location for a new Civic Centre. It outlined that this proposal is a vital part of the Councils regeneration strategy for a number of reasons. In particular, it is noted that the report envisages that the proposed location for the new Civic Centre will form the hub of a wider package of regeneration initiatives designed to transform the economic performance and quality of life in this locality, helping Wealdstone to achieve its full potential. The Cabinet resolved to leave the costly and outdated Civic Centre and build a smaller and more efficient Civic Centre in the heart of Wealdstone, at no net cost to the taxpayers of Harrow over the Regeneration period, be approved in-principle.

- 6.4.47 It is considered that the proposed building layout would enable a high quality, inclusive and legible route from Harrow and Wealdstone Station to the site that is likely to become the future Civic Centre (Peel House Car Park). Furthermore, it is envisaged that the proposed development would serve pedestrian movement from Harrow and Wealdstone Station to allocated sites to the north of the application site (allocated site 05 – Wealdstone Infills), and from Wealdstone Town Centre to the allocated site to the east of the application site (allocated site 07 – Harrow Leisure Centre). The proposal would therefore assist to increase pedestrian and cyclist permeability within Wealdstone District Centre, thereby strengthening the spatial definition of this part of Wealdstone, as required by the site allocation.
- 6.4.48 The presence of the proposed commercial units and the Hub building would appropriately define the character of the public realm and acknowledge the presence of a part of the site within the town centre. The public realm would enjoy very high levels of natural surveillance that would contribute positively to perceptions of security and would encourage active use of the public realm.
- 6.4.49 Policy AAP 7 *Creating a New Public Realm* requires areas of public realm to enhance social use and be flexible in function. In the event that the public realm is adopted as part of the public highway, then control over future uses and events would come to the Council. However, to ensure that the public realm would be actively used should adoption as part of the public highway not take place, it is considered necessary to agree a plan that would set out how events and other uses within the public realm of the development would be delivered and managed. Such a plan may be secured as a condition of any planning permission.
- 6.4.50 An important aspect of any public realm is the detailed landscaping layout. It is noted that landscaping plans have been provided as part of the application documents. Importantly, the proposed landscaping layout includes greening along the edges of the site and along the edges of the flyover and this is considered to be a positive aspect of the landscaping layout. The submitted plans have been considered by the Councils Landscape Architect, the Councils Urban Design Officer and the Design Review Panel, who have each raised some concerns about the layout and detailing of the proposed landscaping scheme. In particular,
- Further detail is required for planters, including heights
  - Further information is required for planting around entrances and front doors
  - A more detailed lighting strategy is required
  - A space sharing strategy has not been submitted
  - Concerns about the planting layout between blocks A and B and about the quality of some of the proposed raised beds and planting areas
  - There appears to be a clutter of ramps and steps (level changes) between the north east corner of block B and the raised planters.
- 6.4.51 Whilst the proposed building layout is considered to be acceptable, it is however considered that a clear and acceptable landscaping strategy to



support a high quality public realm has not been submitted as part of the application documents. It is considered that an improved hard and soft landscaping layout and associated specific details (materials, sizes and shapes of planters, types of planting etc) should be secured as a condition of planning permission.

### Taller Buildings

6.4.52 As noted above, proposed blocks A and E are considered to be 'taller' rather than tall building for the purposes of the Local Plan definition. Policy AAP 6 requires proposals for taller buildings to be justified in community benefit and urban design terms, and to:

- be of a high standard of architectural quality and design;
- protect & preserve views and conserve & enhance the significance of heritage assets;
- be sensitive to, and engage with, the street environment, and encourage use of the street by pedestrians;
- provide for an articulation of the prevailing parapet height of adjacent buildings; and
- avoid a canyon effect.

6.4.53 Blocks A and E would be 5/2 storeys and 4 storeys respectively and would represent a more traditional scale, in keeping with building heights in the surrounding area. Both of these blocks would comprise of brick structures, referencing the ground floor element of blocks B and C. The proposed full height window openings would also reference these proposed taller blocks.

6.4.54 Block A would have a similar storey height as Birchfield House (5 storeys), sited west of the application site. As with blocks B and C, block A would be stepped and tiered. It would step from five storeys to two storeys. The stepped arrangement would articulate a managed transition in the building height between Palmerston Road and Masons Avenue, where buildings are generally two-storey in height. Revisions to the appearance of this building include a revised front elevation providing an improved wall to window ratio and provision of a small commercial unit at the north-eastern corner to create an active frontage.

6.4.55 Block E would be 4 storeys and would be located on the eastern side of the site. Since the submission of the original application, the appearance of this building has been amended. In particular, the openings to the ground floor commercial units have been enlarged, window sizes are more consistent and balconies have been removed from the southern elevation. It is considered that these amendments have improved the overall design and appearance of this building. A further revision to the design and layout of this building is the provision of a refuse store in the ground floor, at the rear of the building. The provision of refuse storage in this location is considered to be appropriate in principle. However, it is considered that the associated elevational treatment could be improved to that the refuse storage area is a less obvious element of the overall development. An appropriately worded condition is suggested to address this concern.

- 6.4.56 Each of the proposed blocks, including blocks A and E, would have commercial uses at ground floor level. The introduction of these active uses to the ground floors together with the new residential use of the site and the proposed public realm are likely to 'activate' Palmerston Road and Masons Avenue, and draw pedestrians to these parts of the Wealdstone.
- 6.4.57 The submitted Planning Statement states that the proposed development would not create a canyon effect, as the principal blocks (B&C) would be aligned with Palmerston Road and would not follow the alignment of the flyover. This has been considered and is accepted.
- 6.4.58 Following revisions to their initial appearance, it is considered subject to appropriately worded planning conditions that the architectural quality of the proposed taller buildings, blocks A and E, would be of a high design standard, consistent with that of the other proposed buildings on the site. They would be a part of the development delivering a wider regeneration and other community benefits as set out in the appraisal of 'tall' buildings above. Consideration of the impact of the development upon views and heritage are dealt with separately below.
- 6.4.59 Block D (the Hub building) cannot be defined as a taller building. To ensure completeness, it is deemed appropriate to consider its scale, layout and appearance in this part of the appraisal. The Hub has been the subject of much discussion throughout the pre-application process and through the application process. There are a number of constraints affecting the appearance and layout of the proposed Hub building. In particular, the need for servicing the development off Masons Avenue and the presence of the flyover above the eastern part (unit 06) of the Hub have been integral to design considerations.
- 6.4.60 The western-most part (unit 05) of the Hub would be two/three storey's in height. The front wall of this unit would align with the front wall of the adjacent two storey terrace. The layout and appearance of this unit is considered to be appropriate in its context. There is no objection to the height or scale of this unit (three storey's) given its distance from the adjacent two-storey terrace (6.5m) and the presence of three storey properties on the southern side of Masons Avenue.
- 6.4.61 The eastern-most part of the Hub building (unit 06) would be sited immediately beneath the existing flyover. It would be single storey in form and, as per the request of the Highways Authority, a 2m gap would be provided between it and the underside of the flyover. This is to ensure that space remains for inspections and maintenance of the flyover. The eastern part of the proposed Hub would be a modular building with a light-weight appearance. This is to ensure that the structure would be easily demountable should any major work to the flyover be required. Although a taller, more permanent structure may have been more in keeping with the streetscene, the requirements of the Highways Authority are noted and it is considered that the applicant has responded appropriately to address the concerns.

6.4.62 As a whole, it is considered that the proposed Hub building would have an acceptable appearance and scale. It is considered that its proposed siting, use (as discussed above) and layout would provide a vibrant and welcoming entrance to the site. Subject to the agreement of the proposed materials to be used in the external surfaces of the Hub, it is considered that this building would introduce an exciting regeneration opportunity to Masons Avenue and the wider area. It is proposed to include in the Section 106, a Planning Obligation to ensure that the Council can carry out inspections and maintenance works to the flyover.

#### Locally Protected Views

6.4.63 London Plan Policy 7.12 *Implementing the London View Management Framework* (LVMF) sets out the planning decisions criteria for the consideration of proposals affecting views designated in that Plan. None of the London Plan designated views relate to Harrow, however it is worthy of note here that the policy enables boroughs to apply the LVMF principles to the designation and management of local views. In 2012 the Mayor of London supplemented Policy 7.12 with the replacement *London View Management Framework* SPG. Harrow's Views Assessment was carried out in accordance with the methodology set out in the SPG and followed the principles of the parent London Plan Policy 7.12.

6.4.64 Following the completion of the Harrow Views Assessment in 2012, 11 local views are identified for protection in the Local Plan and fall into three broad categories: protected views within an urban setting; protected medium range views from open space; and protected long range reviews from open space. A description of and visual management guidance for each view is given is provided at Schedule 3 of the Development Management Policies Local Plan document.

6.4.65 The Harrow Views Assessment incorporated policy recommendations and these have been written into the Local Plan. With cross references from various other parts of the Local Plan, Policy DM 3 *Protected Views and Vistas* states that:

- Development within a landmark viewing corridor (shown in red) should not exceed the specified threshold height unless it would comprise world class architecture or display outstanding qualities either of which would result in the enhancement of the protected view.
- Development in the wider setting consultation area (shown in yellow) should form an attractive element in its own right and preserve or enhance the viewer's ability to recognise and appreciate the landmark.

6.4.66 The Policy also requires that development should:

- not harm and, where possible, should make a positive contribution to the characteristics and composition of views and their landmark elements; and preserve and enhance the viewer's ability to recognise and appreciate the landmark;
- not be overly intrusive or unsightly in the foreground and middle ground to

the detriment of the view or detract from the prominence of the landmark;  
and

- give context to landmarks and not harm the composition of the view as a whole in the background.

6.4.67 The application site does not fall within a landmark viewing corridor. However, it does lie within a Wider Setting Consultation Area of the following two protected views:

6.4.68

- Protected Views Setting Corridor: Roxborough Road Footbridge, View of Harrow Weald Ridge
- Protected Views Setting Corridor: Proposed Country Park at Wood Farm  
Proposed Country Park at Wood Farm

6.4.69 The application has been accompanied by a Visual Impact Assessment which considers fifteen separate viewpoints. The impact of the proposal (both individually and cumulatively with other schemes at No. 51 College Road and Lyon Road) have been considered within the assessment. For each of the assessed views photo montages have been produced to show the predicted impact of the proposed development.

6.4.70 Importantly, the impact of the proposal on the above two Protected Views Setting Corridors have been assessed within the report and these are considered in detail below.

#### *Roxborough Road Bridge*

6.4.71 The Roxborough Road Bridge viewing location provides a protected view within an urban setting. It comprises the segregated pedestrian bridge over the Metropolitan and Chiltern railway lines to the south-east of the Morrison's/Trident Point development. It provides a view towards St. Mary's Church and Harrow-on-the-Hill, and a view towards Harrow Weald Ridge. It is the unique opportunity to view both of these significant features of Harrow that deems this view as valuable. Given the siting of the proposed development, the current application requires consideration of this view towards Harrow Weald Ridge.

6.4.72 The Local Plan acknowledges in Schedule 3 that the foreground of this view towards Harrow Weald Ridge is occupied by a number of distracting urban elements. The applicant's VIA finds that one of the proposed tall buildings would be visible from this view point and would protrude slightly above nearby pitched roofs. However, the VIA states that the height of this protrusion would be 'commensurate with the height of the buildings in the foreground'. It is clear from the submitted VIA that the height of the protrusion would not extend above the yellow line shown in schedule 3 of the Local Plan. The report concludes that the impact of the development on this protected view is negligible. Officers agree with this conclusion and consider that the policy objectives for the view would not be compromised.

### *Stanmore Country Park Extension, Wood Farm*

- 6.4.73 The Wood Farm viewing location provides a protected long range view from open space. It is situated at the north end of Stanmore Country Park extension, which recently opened to the public. It provides views towards central London, Wembley Stadium and Harrow-on-the-Hill/St. Mary's Church. The view is deemed valuable because of the excellent opportunity that it provides to view Harrow-on-the-Hill (and indeed the Borough more generally) within the context of London as a whole. The view is defined by a narrow landmark viewing corridor in the south-west direction towards the Hill and by a wider setting consultation area either side (but predominantly to the east) of the landmark viewing corridor.
- 6.4.74 The visualisations within the submitted VIA demonstrate that the proposed development would not obstruct or distract from the views of Harrow on the Hill or St Mary's church spire. It would lie well to the right of these landmarks and the majority of the development would be hidden behind the hill at Stanmore Golf Club. The VIA finds that 'at worst, the top two storey's of the tallest tower would be visible' but given the distance concludes that the impact would be negligible. Officers note that the development proposal would not extend above the yellow line shown in Schedule 3 of the Local Plan. It is considered that the proposal would be viewed in the context of the mixed townscape of the Opportunity Area and would not affect the viewer's ability to appreciate the spire of Harrow on the Hill or St Mary's church spire.
- 6.4.75 Overall, having regard to the visualisations and analysis within the VIA, officers are satisfied that the development would maintain the viewers ability to recognise and appreciate the landmark qualities of St. Mary's Church, Harrow-on-the-Hill and the Harrow Weald Ridge and would have no effect on the composition of protected views identified within the Harrow DMPLP (2013).
- 6.4.76 The applicant has also supplied information to the LPA to demonstrate that the development proposal would not have an undue visual impact from other viewing points within and outside of the Borough. On the basis of the information that has been submitted, it is clear that the policy objectives of DM3 would not be compromised as a result of the current proposal.

### Townscape Character

- 6.4.77 London Plan Policy 7.4 *Local Character* requires buildings, streets and open spaces to be of high quality design and to respond to the pattern/grain of existing spaces, contribute to a positive relationship between urban structure and natural landscape, ensure buildings create a positive relationship at street level, allow existing buildings to make a positive contribution to character, and be informed by the surrounding historic environment. Local Plan Policy AAP 1 *Development within Harrow town centre* requires development to strengthen the character, legibility and role of the Metropolitan centre. Many of the issues raised in these policies overlap with other policies that are appraised elsewhere in this report.

- 6.4.78 The site is currently occupied by low level buildings and local views tend to be dominated by these buildings and their associated visual clutter. The submitted Design and Access Statement contains various helpful images to assist the understanding of the contextual impact of the proposal. As shown by these visualisations, the proposed development and in particular the two proposed tall buildings would contrast with the scale of existing buildings in the area. It is noted that a number of objections have been received with regard to the impacts of the proposal on the townscape. In particular, concerns have been expressed in relation to the height of the proposed buildings and their impacts on the skyline; the failure of the proposal to respect local context; the scale, appearance and character of the proposal and the impacts of the proposal on views of Wealdstone. These concerns are acknowledged.
- 6.4.79 As set out earlier in this report, it is considered that the proposal would introduce high quality architecture, materials and public realm to the site. Nonetheless, it is acknowledged that the proposal would create dramatic impacts to the townscape. Various experts in the design field, including those at the GLA, have concluded that the scale would not cause detriment to the urban context of the area.
- 6.4.80 As with any planning proposal, local adverse impact must be weighed in balance against all other relevant material planning considerations. These include making effective use of brownfield land, the proposed high quality of architecture and accommodation, its contribution to housing including affordable housing, the location of the site within the Opportunity Area and Heart of Harrow Housing Zone and local objectives to promote the regeneration of Wealdstone District Centre. On balance, officers consider that any actual or perceived local adverse impacts on townscape would not outweigh the overall benefits of the proposal.

#### Lifetime Neighbourhoods

- 6.4.81 London Plan Policy 7.1 *Lifetime Neighbourhoods* requires development to: improve people's access to social and community infrastructure, shops, services, employment opportunities and public transport; contribute to healthy, active lives, social inclusion and cohesion, and people's sense of place, safety and security; and reinforce the character, legibility, permeability and accessibility of the neighbourhood. Local Plan Policy DM2 *Achieving Lifetime Neighbourhoods* requires the location, design and layout of development, and any associated improvements to the public realm, transport and other infrastructure, to contribute to the creation of lifetime neighbourhoods.

- *Location & Accessibility of Non-Residential Development*

- 6.4.82 As noted elsewhere in this report, the western part of the site is within Wealdstone District Centre but is not within the primary shopping area. The proposed Hub building would secure an 'anchor' non-residential use within the development and, together with other proposed non-residential uses and the new public realm, would be likely to encourage linked trips between the site and the range of other shops, services and offices available throughout Wealdstone District centre. In doing so, the proposal would help to sustain this

District centre and, in particular, would help to enhance the vibrancy of the adjacent parts of Masons Avenue and Palmerston Road.

- 6.4.83 The retail / commercial / community uses applied-for include A1, B1, D1 and D2 uses. The submitted floorplans drawings show the general internal configuration of these proposed uses, but detailed layouts have not been provided. The Council's Access for All SPD (2006) sets out guidelines for the detailed design and layout of entrances, entrance lobbies and 'café culture' spaces. To ensure that the specifications of these components complies with the SPD or such other guidelines as are up-to-date at the time of development, it is considered necessary to reserve such detail for consideration as part of an inclusive access strategy which may be required as a condition of planning permission.
- 6.4.84 Four 'blue badge' car parking spaces for disabled users would be provided within the basement car park. It is considered that an appropriately worded planning condition could secure details relating to an intercom system for entry to the basement. Access from the basement car park to surface level would be via lifts.
- 6.4.85 As stated, the site slopes from south to north, with the northern part of the site approximately 3m higher than the southern part of the site. The submitted drawings indicate that this change in levels has been considered as part of the public realm proposal within the development. To ensure that the change in levels is appropriately treated, it is considered that the revised landscaping information should incorporate details of gradients and any necessary landing areas, handrails and surface treatment. The GLA have requested that a space-sharing strategy be provided to ensure the safety of elderly and disabled residents and visitors. It is considered that this strategy could be provided as part of the above-mentioned inclusive access strategy.

- *Location & Accessibility of Residential Development*

- 6.4.86 Occupiers of the proposed flats would enjoy good access to the services and facilities available within Wealdstone District centre, including those to be provided on the site, and those elsewhere via public transport routes serving nearby Harrow and Wealdstone Station. The wider area surrounding Wealdstone District centre includes a number of places of worship, schools and health care facilities.
- 6.4.87 Policy 3.8.c of the London Plan (2016) requires 'ninety per cent of new housing meets Building Regulation requirement M4 (2) 'accessible and adaptable dwellings'. Criterion d requires 'ten per cent of new housing meets Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. The submitted application documents advise that nineteen units in block B are proposed as 'wheelchair user dwellings', and are designed to be easily adaptable for residents who are wheelchair users. This would equate to 10 per cent of the proposed 186 homes. 90 per cent of the proposed units would meet Building Regulation requirement 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 comply with the policies outlined above.

- *Secured by Design*

- 6.4.88 Policy 7.3 of The London Plan (2011) and core policy CS1 E of the Harrow Core Strategy 2012 seek to ensure that developments should address security issues and provide safe and secure environments.
- 6.4.89 The application is accompanied by a Secured By Design Statement and it is noted that the applicants have reviewed their proposal with the Design Out Crime Officer. The Designing out Crime officer has responded to the consultation process. Whilst objections to the proposal have not been raised, some recommendations have been provided relating to the types of windows and doors, the mail delivery system and the location of utility meters, communal areas and bin and cycle stores. It is noted that the proposed development is capable of complying with these recommendations, but that some further detail is required from the application. A suitable condition is therefore recommended as set out at the end of this report to ensure that the development will achieve Secured by Design certification prior to occupation.
- 6.4.90 There is strong potential for pedestrian activity through the site. It is envisaged that the residential use and the ground floor retail/commercial /community uses would generate a high level of daytime/evening activity within the development. The layout and nature of the proposed development is such that the new public realm areas would be overlooked by the new flats and would be activated at ground floor level by the proposed non-residential uses, providing high levels of natural surveillance.
- 6.4.91 The public pedestrian routes through the site would be controlled by gates which would be open from dawn to dusk to allow free flow of pedestrian access during the daytime and restrict access at night-time. The submitted application documents advise that this is to prevent anti-social behaviour at night. Transport for London (TfL) initially expressed concerns in relation to this proposal, considering that it would undermine the accessibility/permeability of the site. These comments are noted. In response to these concerns, the Design Out Crime Officer has advised that the Metropolitan Police is in favour of the 'gating' proposals as it would restrict access to only those who live within the development during 'out of hours'. TfL have considered these comments and have not raised any objections. It is acknowledged that policy DM2.A.d resists gated developments. However, having regard to the comments received from the Metropolitan Police and the proposal to open the development from dawn to dusk, it is considered in this instance that the proposals would generally accord with the principles of Secure by Design.
- 6.4.92 The submitted site layout plan shows the proposed location of the gates, and the submitted section drawings show the proposed gates in the context of the proposed development. The location of the proposed gates is considered to be acceptable. However, the height of the proposed gated would be excessive (over 3m). It is considered necessary to attach a planning condition to secure



- full details of the proposed gates (including reduced height) prior to the occupation of the proposed development.
- 6.4.93 The space under the flyover was the subject of much discussion during the pre-application advice process. As discussed, it is considered that the inclusion of this space and the treatment of this space is critical to ensure unity of the parcels of land at each side of the flyover and to ensure the success of the development overall. Central to this vision is the inclusion of appropriate, ambient lighting, which would assist to create a secure and inviting space. The applicant has provided an indicative lighting layout but has not provided a lighting strategy to support this. Nonetheless, it is considered that a detailed lighting strategy for the entire site can be secured by way of an appropriately worded planning condition.
- 6.4.94 As discussed, the proposed siting of a tall building at each side of the flyover is considered to be a positive design response to this constrained site. However, the site layout has resulted in some 'pinch points'. In particular, the access points to the site at the eastern flank elevation of building B (access point 02) appears somewhat narrow when compared to other access points to the site. The matter was raised by both the GLA and the Design Review Panel. The design team have addressed this by reconfiguring the layout of the northernmost commercial unit in block B to create more space. It is considered that this has improved the 'conflict' in this location and would improve permeability. Given the presence of the flyover along this pedestrian route, ground level activity and appropriate landscape treatment are considered to be particularly important to encourage pedestrian activity and to prevent anti-social behaviour. It is considered that the ground floor commercial units in blocks B and C are appropriately sited as they would naturally increase pedestrian activity and increase natural surveillance. For this reason it is considered necessary to control, as a condition of any planning permission, the window treatment at these locations within the development so that there remains at all times an appropriate level of inter-visibility between the internal and external spaces. In addition to this, the proposed landscaping treatment along the edges of the flyover would make these routes more inviting and would assist to guide pedestrians through the site.
- 6.4.95 The ground floor flats have been designed with landscaped defensible areas to ensure both security and privacy. The dedicated playspace would enjoy natural surveillance from the Hub building and the ground floor commercial unit in Block E. This is considered to be acceptable.
- 6.4.96 Car parking for the development would be provided within the proposed basement area. Once parked within the basement, residents would be able to access the relevant part of the development via the lift and stair cores which extend down from the residential floors of blocks A and B. Lighting within the car park together with details of how the basement can be safely accessed by vehicles can be controlled via a Car Park Management Plan which may be required as a condition of any planning permission.
- 6.4.97 Cycle storage would be provided in various location across the site – in the basement, within the ground floor of blocks B and C and at surface level.

Short-stay cycle storage for visitors would be made via the provision of stands within the public realm. Given the concerns in relation to the proposed landscaping layout (as discussed above), it is deemed appropriate to give further consideration to the proposed siting of these stands as part of the revised hard and soft landscaping layout which would be required as a condition of any planning permission.

- 6.4.98 There would be no general public access to the bin storage areas. On-site management would ensure that bins are transported up to the collection point and returned to storage thereafter on collection days.
- 6.4.99 Subject to various planning conditions, it is considered that the proposed development would be inclusive and accessible to future residents and visitors alike, and would create opportunities for employment and community activity that would contribute positively to the vibrancy of Wealdstone District centre. By providing a mix of homes suitable for occupation throughout the life cycle, together with a proportion of homes suitable for wheelchair users, and a new physical connection between Masons Avenue and Palmerston Road, the development would contribute to the creation of a lifetime neighbourhood and a balanced community.

Overall, it is considered that the proposal would provide a much needed physical renewal of the site. The proposed public realm would not only assist to sustain the development itself but would provide new, high quality, inclusive and legible routes through the site. This would in turn assist to increase permeability within Wealdstone District Centre and strengthen the spatial definition of this part of Wealdstone, as required by the site allocation. As a whole, it is considered that the proposal would accord with the principles of Lifetime Neighbourhoods and in this regard is considered to be acceptable.

## **6.5 RESIDENTIAL AMENITY**

### Residential Quality of Proposed Development

- 6.5.1 The National Planning Policy Framework emphasises that ‘The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people’ (paragraph 56) and states that planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.” (Paragraph 61).
- 6.5.2 Policy 7.6B, subsection D, of The London Plan (2016) states that new buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. London Plan Policy 3.5 *Quality of Design and Housing Developments* sets out several criteria for achieving good quality residential development. The policy aims to ensure that developments enhance the quality of local places and create homes that reflect the minimum space standards and are fit for purposes in other respects. Further to this, the Mayor’s *Housing* SPG (2012) sets out detailed guidance on

a range of matters relating to residential quality and are intended to ensure that all new homes are functional and fit for purpose and offer the potential to be occupied over time by households of all tenures.

6.5.3 Core Strategy Policy CS1 K requires a high standard of design and layout across all tenures within a development and consistent with the London Plan and its associated SPG. Local Plan Policy AAP 4 *Achieving a High Standard of Development throughout the Heart of Harrow* requires new homes within the heart of Harrow to achieve a high standard of residential quality, whilst Policy AAP 13 *Housing within the Heart of Harrow* sets out a range of criteria to ensure that mixed, sustainable communities are created. Policy DM 1 *Achieving a High Standard of Development* requires all development to achieve a high standard of privacy and amenity, and sets out a range of criteria for the consideration of the same. The Council's Residential Design Guide supplementary planning document is also relevant.

- *Defining good places*

6.5.4 As part of the AAP strategy for the transformation of the Heart of Harrow it is considered that the proposed development would make a positive contribution to the creation of high quality public realm and a positive sense of place. The proposed mix of uses and layout of public space is informed by the sites complimentary role to the Wealdstone District centre, and as discussed it will add to the permeability the Central Wealdstone sub area.

6.5.5 The proposal would provide new opportunities for those seeking to live within a contemporary environment within Wealdstone District centre, and would benefit from access to the excellent public transport facilities. The public realm areas within the development would enjoy high levels of natural surveillance from the commercial, community and residential uses within the development itself. Taking all of this into account, and the conclusions about the quality of the development elsewhere in this report, it is considered that the proposal would enhance the quality of Wealdstone District centre in accordance with the principles of London Plan Policy 3.5.

- *Outdoor spaces including gardens*

6.5.6 Local Plan policy AAP 11 *Provision of Open Space* requires major developments within town centres to secure the provision of appropriate civic space and sets out criteria for the location and layout of new open space. The adequacy of the proposed public realm is appraised elsewhere in this report.

6.5.7 Local Plan policy AAP 13 also calls for appropriate forms of useable, outdoor space. The revised proposal makes provision for rooftop gardens on top of the lower parts of blocks B and C and on top of building E. An assessment of the wind microclimate of the proposed development has been submitted with the planning application, and is explained in greater detail under the tall buildings section of this report. As noted in that section of this report, the elevated location of the rooftop gardens is such that mitigation is required to secure suitable levels of comfort to the rooftop gardens, and this is proposed in the form of soft landscaping. Such mitigation can be secured as a condition of any

planning permission.

- 6.5.8 Although an assessment of sunlight levels to the ground level amenity areas within the proposed development has been provided, there is no technical information relating to the performance of the rooftop gardens. However, due to the siting of the rooftops gardens south of the proposed tallest blocks, it is considered these rooftop gardens would receive adequate levels of sunlight.
- 6.5.9 The communal rooftop gardens would be accessible via the internal lifts and the corridor of the relevant floor. Subject to an appropriately worded planning condition requiring level access at the threshold of the internal and external space, and an adequate layout of the spaces (including any landscaping/screens etc.) to ensure adequate circulation, it is considered that the rooftop gardens would be accessible to wheelchair users. The design of the proposal is such that the rooftop gardens would enjoy natural surveillance from adjoining flats within their host building. The management of the communal rooftop gardens would be a matter for the applicant Origin Housing, as the leaseholder/managing company.
- *Outdoor play space*
- 6.5.10 Local Plan Policy AAP 11 requires all major development to provide sufficient play space on site to meet the needs of the development, whilst Policies AAP 13 and DM 28 *Children and Young People's Play Facilities* reiterate the need for children's play space. 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.
- 6.5.11 The application proposes a total of 260 square metres of play space within the proposed development. There is no provision made on the site for children over 5 years which is regrettable. To mitigate the requirement in respect of that age cohort, a contribution towards enhanced off-site provision is sought as part of the Planning Obligation.
- 6.5.12 Paragraph 4.48 of the Play SPG advises that play spaces should benefit from overlooking/passive surveillance. The proposal would enjoy high levels of natural surveillance from the Hub building and commercial uses at ground floor level, and from the flats, balconies and roof gardens at the upper levels. In addition the site would be gated from dusk to dawn and Origin would also have a site manager present on the site. In all of these circumstances it is concluded that the play space provision would be reasonably safe and secure.
- 6.5.13 As per the submitted daylight / sunlight report, all of the play space would receive some sunlight, although it is accepted that the area beneath the flyover would be shaded. As noted in the air quality section of this report, mitigation of the concentrations of nitrogen dioxide is required and this can be achieved as a condition of any planning permission. Given the extent and quality of the proposed play space and equipment that would be provided, and subject to the achievement of appropriate mitigation, the environmental conditions of the proposed play spaces are considered – on balance – to be acceptable.

6.5.14 All of the play space would be located at ground level and would therefore be accessible to the mobility impaired. In accordance with the inclusion principles set out in the Mayor's *Play* SPG, it is considered that the equipment provided should make provision for children with disabilities and special sensory needs. This can be secured as part of the agreement of details, by condition.

- *Entrances*

6.5.15 The Mayor's *Housing* SPG calls for entrances to be visible from the public realm and clearly defined. The residential and commercial entrances to the buildings would face towards public realm and / or local highways. They would be visible from and would help to activate the new public realm within the proposed development.

- *Shared circulation*

6.5.16 The SPG sets out the following guidelines (as relevant to the proposed development) for shared circulation space:

- all flats should be provided with an entry-phone system to operate the release of the main (communal) entrance door and that, unless a 24 hour concierge is provided, audio-visual verification to the access control system should be provided;
- internal corridors should receive natural light and ventilation;
- all flats (from 7th floor upwards) should be served by at least two lifts; and
- the number of flats accessed from a single core should not exceed 8 per floor.

6.5.17 In accordance with the SPG and to ensure that the required high standard with regards to functionality, as sought by Local Plan Policy DM 1, it is considered that an audio-visual entry system should be installed or such other alternative access security measures as may be appropriate and which should be agreed by condition.

6.5.18 The internal corridors would be served by narrow windows, and so would not be wholly reliant on artificial light and ventilation.

6.5.19 Buildings B and C (the proposed tallest buildings) would be served by their own dual lift and stair core, meaning that the entrance level of all flats would be served by two lifts. It is noted that buildings A and E would be served by only one lift. Given that these building would not exceed 7 floors, this is an acceptable design approach. The number of flats accessed from each of the cores would not exceed 8.

- *Space standards, flexibility and adaptability*

6.5.20 The minimum space standards are set out at Table 3.3 of the London Plan and are reproduced within the SPG. All of the proposed 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.

- *Storage and utility space, study and work*

6.5.21 All of the flats incorporate an element of storage space but, to ensure compliance with this standard, it is considered necessary to secure this as a condition of any planning permission.

6.5.22 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. It is envisaged that occupiers will make their own arrangements with regard to securing internet access.

- *Private open space*

6.5.23 The SPG seeks a minimum of 5 square metres private outdoor space for 1 & 2 person dwellings, increasing by 1 square metre for each additional occupant.

6.5.24 With the exception of two units, all of the proposed flats would be provided with private amenity space, in the form of a balcony, a winter garden or a private garden. Although the absence of proposed private amenity for two of the residential units is regrettable, it is acknowledged that the occupiers would have easy access to a communal roof garden and this is considered to be acceptable.

- *Privacy*

6.5.25 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 2.3.30 of the SPG refers to the acoustic as well as the visual privacy of homes within a development – see appraisal under heading *internal noise* below.

6.5.26 The starting point for the consideration of the subject proposal is its accessible town centre location and high density character, making effective use of this previously-developed site. Future occupiers choosing to live at the development are likely to have different expectations about the level of privacy afforded from such a development than those choosing to live in more traditional, suburban environments.

6.5.27 The separation distances between the facing flanks of the blocks is shown in the below table:

- Between blocks A and B = 16 – 17.9m
- Between blocks B and C = 27.5m – 46m
- Between blocks C and E = 4.2m

6.5.28 These elevations would, of course, all contain habitable room windows and balconies, meaning that there would be some level of visibility between homes on the same level (i.e. looking directly across) and some perception of visibility to/from homes on other levels within the development.

- 6.5.29 Of note, is the short separate distance between blocks C and E (4.2m). It is noted that habitable room windows and private balconies are proposed on the southern elevation of block C. Non-habitable room windows (stairwell and bathroom) are proposed on the northern elevation of block E. Subject to an appropriately worded planning condition requiring these non-habitable room windows (in block E) to be obscure-glazed and non-opening below 1.7m above finished floor level, it is considered that an acceptable standard of privacy for future occupiers of the affected units in blocks C and E would be achieved.
- 6.5.30 Given the high density nature of the proposal which is consistent with the need to make effective use of this highly accessible site, it is considered that the proposed distances / relationships (as set out above) would, generally, secure an acceptable standard of privacy for future occupiers of the development.
- 6.5.31 It is intended to delineate the rooftop gardens through the use of hard and soft landscape elements. It is considered that these elements are necessary to provide appropriate levels of privacy to the nearby flats. In particular, this is considered to be necessary for the rooftop terrace on top of block E as it would be sited particularly close to flats within block C. Such details may be controlled by condition as part of the hard and soft landscaping details.
- 6.5.32 A consequence of the proposed building layout is that there would be close proximity between the window/balcony openings in the flank elevations of blocks B and C and the flyover (which accommodates pedestrian and vehicular movement). This could result in some actual/perceived overlooking impacts of the flats within these blocks. Whilst such impacts could be mitigated by the use of obscure glazing and privacy screens, as a condition of any planning permission, it is considered that this would risk compromising the design quality of the proposal and the benefit to future occupiers of flats with a means of outlook on two aspects. On balance of these considerations, and again recognising that those choosing to live in a high density town centre development are likely to have different expectations about privacy, it is concluded that the aforementioned consequence of the proposal's layout is acceptable.
- 6.5.33 The submitted landscape layout shows landscaped defensible space for each of the proposed ground floor residential units.
- 6.5.34 Overall, and on balance with other residential quality considerations, it is considered that the proposal would secure a standard of visual privacy for future occupiers that is commensurate with the intended high density, urban character of the proposed development and the location.
- *Dual aspect*
- 6.5.35 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.

6.5.36 The majority of the flats within the proposed development would have dual aspect. The following 25 flats would be single aspect only:

- 6 units within block A – A/1-2, A/1-3, A/1-4, A/2-2, A/3-2, A/4-2 (both east and west facing)
- 9 units within block B – B/G-1, B/1-4, B/2-4, B/3-4, B/4-4, B/5-4, B/6-4, B/7-4, B/8-4 (all west facing)
- 10 units within block C – C/G-1, C/1-4, C/2-4, C/3-4, C/4-4, C/5-4, C/6-4, C/7-4, C/8-4, C/9-4 (all east facing)

6.5.37 The provision of single aspect flats is regrettable. However, it is noted that none of the 25 single aspect flats would be north facing only, although two of the units would contain three bedrooms. Every effort has been made in the design and layout of the proposal to maximise the number of dual aspect flats. On balance, it is considered that the future occupiers of the 25 single aspect flats would not be exposed to unacceptably poor living conditions and it is considered that withholding planning permission on this basis would not be justified.

- *Internal noise*

6.5.38 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. Local Plan Policy DM1 includes among its privacy and amenity considerations the adequacy of the internal layout in relation to the needs of future occupiers, and Harrow's Residential Design Guide SPD amplifies the point by advising that the vertical and horizontal arrangement of flats within a development should avoid conflicting room-use (i.e. bedroom vs. living/other room) relationships between flats.

6.5.39 In this regard, the proposal performs well, as generally the proposal secures a good horizontal arrangement. The use of repeated layouts over several floors at a time ensures that conflicting vertical arrangements are minimised. The objective of the SPD in this regard is to supplement the sound insulation requirements of the Building Regulations which would, of course, still need to be achieved.

- *Floor to ceiling heights*

6.5.40 The SPG seeks a minimum floor to ceiling height between finished floor level and finished ceiling height in habitable rooms of 2.5 metres. Cross sections shown on the application drawings confirm that this would be achieved.

- *Daylight*

6.5.41 The SPG does not establish a baseline standard for daylight or sunlight. Local Plan Policy DM1 includes among its amenity considerations the adequacy of light and outlook within buildings (habitable rooms and kitchens).



- 6.5.42 Two reports which consider daylight and sunlight have been included as part of the submission documents. One of the reports considers daylight within the proposed dwellings. The approach used within this report is more sophisticated than the Council's 45 degree code and so it is considered to be more relevant (than the 45 degree code) in the assessment of the proposal's amenity impacts, pursuant to Policy DM1.
- 6.5.43 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.
- 6.5.44 A selection of rooms within the ground and first floors of the development have been tested for the purposes of the assessment. These are considered to represent the worst case scenario, as these are at the lowest levels of the development. The reported headline daylight (ADF) results are as follows:
- 26 of the 28 of the living room / kitchen / dining rooms tested (93%) would comply with the BRE guidelines; and
  - 55 of the 59 bedrooms tested (93%) would comply with the BRE guideline.
- 6.5.45 Clearly it is desirable for a new development to achieve 100% compliance with the recommendations of the BRE guidelines. However for high density, urban development it is inevitable that some compromise may be required between various planning considerations that may influence the site layout. This is recognised by the Mayors Housing SPG. 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 DM 1 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. The majority of flats would benefit from a dual aspect; all flats would meet or exceed the London Plan minimum space standards; the majority of flats would have access to a private balcony and all flats would have access to communal roofspace. It is considered on balance that the poor performance of some parts of the development in terms of the recommended BRE guidelines is not unacceptable.

#### Amenity of Neighbouring Occupiers

- 6.5.46 London Plan Policy 7.6 *Architecture* states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to privacy, overshadowing, wind and microclimate.
- 6.5.47 Core Strategy Policy CS1 B requires development to respond positively to the local context in terms of design, siting, density and spacing. Policy DM1 requires all development to achieve a high standard of privacy and amenity, and sets out a number of criteria for the consideration of the same. The Council's Residential Design Guide supplementary planning document is also

relevant.

6.5.48 The application site is located in an urban area. The surrounding area has a variety of building styles of varying heights and sizes, and a variety of land uses. As such, the character of the surrounding area is mixed. The nearest properties to the site are as follows:

- The site is bounded to the west by a vehicular entrance to a servicing and parking area which serves Station House (No. 11-13 Masons Avenue), a four storey building in mixed use. The ground floor of the building has a lawful D1 use and is actively used as a place of worship. The first, second and third floors of the building have a lawful B1 Office use.
- Birchfield House is a five storey residential property to the west of the site. Block A would be sited 19.8m from this building.
- Immediately south-west of the application site lies a terrace of two-storey commercial properties with residential use at upper floor levels.
- The site is bounded to the east by a three-storey building which is occupied by a College of Business and Law, and a two-storey building containing business and industrial units
- A terrace of two-storey residential properties lies immediately south-east of the application site.
- No. 14 – 16 Masons Avenue lies on the southern side of Masons Avenue. This, and the adjacent parcel of land, is used for vehicle repairs (Use Class B2).
- A builder's merchant, Travis Perkins, lies on the north-eastern side of the roundabout.
- A place of worship, the International Siddhashram Centre, lies on the north-western side of the roundabout.

- *Visual impact/ Outlook/ Privacy*

6.5.49 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 impacts of each of the proposed blocks on these adjoining premises are appraised as follows:

- *Block A*

6.5.50 The front part of Block A would be 5 storeys high (16.2m to top of parapet). The scale of this part of the building has been informed by the scale of its nearest neighbour, Birchfield House which is also a five storey building. A distance of 19.8m is proposed between these two buildings. The facing elevations would both feature a number of window openings, and it is noted that many of these would be primary windows. However, it is considered that the separation distance of 19.8m would be sufficient to mitigate any intervisibility between these residential buildings and / or harm in terms of loss of outlook from the residential units within Birchfield House.

6.5.51 The rear part of Block B would be 2 storeys high (6.8m). The scale of this part of the building has been informed by the terrace of two-storey properties to the

south of the application site. A distance of 13.6m is proposed between the original two-storey outriggers along this terrace and the two-storey rear wall of block A, in which a number of secondary windows are proposed. The windows in block A and the windows in the neighbouring terrace would be at an angle rather than directly facing each other. It is considered that the proposed distance and angled relationship would sufficiently mitigate any intervisibility between these residential buildings and / or harm in terms of loss of outlook from the residential units.

6.5.52 A 6.6m distance is proposed between the two-storey rear corner of block A and the nearest rear corner of Station House. Station House is predominantly in B1 use, but also has authorised D1 uses on the ground floor. Although commercial premises are not as sensitive as residential premises, an environment within which office and other commercial premises can function practically and without undue distraction can reasonably be expected. Having regard to the proposed site layout, occupiers of Station House would view the proposed block A at an oblique angle. It is considered that this together with the two-storey height of block A (at the rear) would prevent intervisibility and loss of outlook from Station House.

- *Blocks B and C*

6.5.53 Block B (between 9 and 17 storey's) and block C (between 10 and 15 storey's) would have the greatest visual presence on the application site. These blocks would appear as substantial buildings within the surrounding area.

6.5.54 As set out earlier in this report, it is considered that material planning considerations exist to justify the proposal for tall buildings on this allocated site. These include:

- the delivery of a contemporary development with high quality public realm on adjacent sites within the Heart of Harrow (an Opportunity Area and a Housing Zone),
- the delivery of a scheme that would deliver contemporary employment space and high quality housing with a high percentage of affordable units
- the delivery of a scheme that would greatly assist towards the regeneration of Wealdstone district centre.

6.5.55 The submitted Planning Statement and the supporting viability information suggest that these benefits are unlikely to be achieved with lower building heights.

6.5.56 It is noted that the Environmental Information submitted in support of the planning application does not suggest any specific reason why the proposed development would be unacceptable in principle. However, it is acknowledged that block B and C in particular would undoubtedly give rise to a significant change in outlook for the occupiers of neighbouring properties, and in some instances actual and perceived loss of privacy. It is noted that a number of objections have been received on this basis. These concerns are acknowledged.

6.5.57 Taking the above matters into account, it is considered on balance that the harm in terms of the impacts on the visual and residential amenities of some neighbouring occupiers is outweighed by the desire to achieve the above-mentioned planning objectives.

- *Block D*

6.5.58 Block D would comprise the Hub building and would front Masons Avenue. The western-most part (unit 05) would be two/three storey's in height. The front wall of this unit would align with the front wall of the adjacent two storey terrace. The submitted plans show that the projecting three-storey rear wall would comply with the 45 degree code in the horizontal plane in relation to the nearest recessed rear corner of No. 25 Masons Avenue. Having regard to this and the separation distance between the projecting western flank wall of unit 05 and the eastern flank wall of the two-storey outrigger at No. 25 (8.8m), it is considered that the proposed two/three storey height of unit 05 would not give rise to unacceptable visual impacts on the occupiers on the 1<sup>st</sup> floor residential unit at No. 25 or indeed the occupiers of the ground floor commercial unit at No. 25. At ground floor level, it is considered that the proposal would represent an improvement to the amenity of the occupiers of the ground floor commercial unit at No. 25 when compared to the existing situation whereby single storey workshop buildings are sited along the full depth of the western shared boundary. In terms of privacy, there are no flank wall windows on the western flank wall of unit 05 that would give rise to loss of privacy for the occupiers at No. 25.

6.5.59 The eastern-most part of the Hub building (unit 06) would be single storey in height. The nearest neighbours to this proposed structure would be No. 47 Masons Avenue, a single family dwellinghouse. The front wall of this unit would align with the front wall of the adjacent two storey terrace before stepping out by 2m at a width of 8.5m. It is considered that this stepped arrangement is important to protect the visual amenities of the occupiers of No. 47. The eastern flank wall would be sited along the eastern site boundary, the shared boundary with No. 47 Masons Avenue. The proposed single storey building would project 6m beyond the main flank wall of No. 47. However, it would be buffered by the presence of a single storey projection at No. 47 Mason Avenue. It is noted that the occupiers of No. 47 have not objected to this proposal.

- *Block E*

6.5.60 Block E would have four storey's. It would be sited 31m from the two-storey rear walls of No's 47 and 49 Masons Avenue. This distance is considered sufficient to prevent intervisibility between facing windows. It is acknowledged that block E would be sited 8m from the rear gardens of these neighbouring residential dwellings. During the course of the planning application, revised drawings were received showing the removal of private balconies from the southern elevation of block E. These were replaced by secondary windows, which would give rise to less overlooking than the originally proposed balconies.

- 6.5.61 It is acknowledged that the presence of a four storey building in this location would bring about significant change for the occupiers of properties along Masons Avenue, particularly No's 47 and 49. However, given the depth of the rear gardens at these properties (approximately 23.4m) and their siting to the south of block E, it is considered on balance that the proposed siting of block E would not be detrimental to the outlook of the occupiers of No's 47 and 49 Masons Avenue.
- 6.5.62 Block E would be sited just 3.8m from the two-storey building located along the eastern site boundary. However, this building is orientated away from the application site and there are no windows on the western elevation of this building. As such, it is considered that the proposal would not give rise to loss of outlook, loss of privacy or undue impacts for the occupiers of this building.
- 6.5.63 A communal roof garden is proposed on top of block E which could provide opportunities for future occupiers to overlook the neighbouring rear gardens along Masons Avenue in particular. However, it is considered that adequate mitigation could be achieved by obscuring sections of the enclosure to the communal roof garden. Such mitigation may be secured as a condition of any planning permission.

#### *Conclusion*

- 6.5.64 To conclude, Policy DM1 of the Local Plan undertakes to assess amenity having regard to, *inter alia*: the prevailing character of amenity and the need to make effective use of land; the relationship between buildings and site boundaries; and the visual impact when viewed from within buildings and outdoor spaces. The application site and its immediate surroundings are urban in character and enjoy a high level of public transport accessibility. Given the relationship between the proposed development and the nearest neighbouring sites/buildings, some substantial visual impacts would occur. It is considered that such visual impacts are to be expected if necessary growth is to be delivered within one of London's opportunity areas. The proposal would make efficient use of this allocated, previously developed site and would replace rundown buildings with a high quality development. Having regard to all of these considerations, it is considered on balance that the proposal would not unduly impact upon the amenity for neighbouring occupiers.
- 6.5.65 The proposed development would, of course, be visible to residential occupiers and from commercial premises over a much wider area. Given the conclusions about visual impact in relation to property 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.
- 6.5.66 To conclude on privacy, Policy DM1 of the Local Plan undertakes to assess amenity having regard to, *inter alia*: the prevailing character of privacy and the need to make effective use of land; the overlooking relationship between windows and outdoor spaces; and the distances between facing windows to habitable rooms and kitchens. Applying these considerations to the circumstances of the application site and the relationship of the proposed development to its immediate and wider surroundings, it is concluded that the proposal – subject to the specific mitigation recommended - would achieve an

appropriate standard of privacy for neighbouring occupiers.

- *Daylight and sunlight*

- 6.5.67 Two reports which consider daylight and sunlight have been included as part of the submission documents. Both reports were produced by Anstey Horne and one of these consider daylight and sunlight impacts on existing surrounding properties.
- 6.5.68 The assessment uses widely-recognised methodology to assess the proposal's impact upon neighbouring property against British Research Establishment (BRE) guidelines. This approach is more sophisticated than the Council's 45 degree code and so it is considered to be more appropriate for the assessment of the proposal's amenity impacts, pursuant to Policy DM1.
- 6.5.69 The analysis of daylight uses the Vertical Sky Component (VSC) test which measures the amount of skylight available at the centre of a window on the external plane of the window wall. The BRE Guidelines state that if the VSC calculated at the centre of each window is 27% or more, then enough skylight should be reaching the window. If with the implementation of the proposals the window does not achieve 27% VSC but is more than 0.8 times its former value, then the BRE Guidelines state that skylight is unlikely to be seriously affected. VSC merely measures the potential conditions in a room and so can be misleading if considered in isolation. For this reason, the report also considers the Daylight Distribution (DD) test, which calculates the area of working plane level inside a room that will have a direct view of the sky. One of the main benefits of the DD test is that the resulting contour plans show where light falls within a room, both in existing and proposed conditions, and a judgment may be made as to whether the room will retain light to a reasonable depth.
- 6.5.70 For the purposes of measuring the impact upon sunlight received, the assessment uses the widely recognised Annual Probable Sunlight Hours (APSH) method and, again, reports performance relative to the BRE guidelines and evaluates the impacts in accordance with the above classifications. The BRE Guidelines seek that all windows within 90° of due south achieve 25% of the Average Probable Sunlight Hours (APSH) with at least 5% during the winter months. Where this is not achieved and the difference between the existing and proposed APSH is more than 4%, the BRE Guidelines state that the proposals will not have a noticeable effect on sunlight provided the results for the proposed APSH, as well as during the winter months, are within 0.8 times the existing.
- 6.5.71 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.
- 6.5.72 The Council has engaged the services of a specialist consultant to provide independent appraisal of the applicant's daylight and sunlight assessment. He has endorsed the methodologies employed and has provided specific comments where necessary in relation to the assessment findings.

- 6.5.73 The submitted report states that the BRE standards will not be met for all neighbouring properties. It makes the case that the existing site contains low level buildings and as a result, neighbouring properties have very good levels of daylight and sunlight. The reports states that these levels would inevitably be materially reduced by any tall and / or dense development. The specialist consultant considers this to be a valid consideration.
- 6.5.74 The specialist consultant notes that the submitted Anstey Horne report does not contain any significance criteria, stating that this is normally expected. Helpfully, the specialist consultant has provided comment in his report on the significance criteria for each of the properties that have been considered.
- 6.5.75 The Anstey Horne report includes detailed tables of results for the neighbouring properties and an explanation on a property by property basis in the main body of their report. The specialist consultant has considered the tables of results and provided helpful commentary in relation to the neighbouring properties that the report considers. This is as follows:

- 1 - 46 Birchfields

The eastern elevation of this five-storey residential property faces towards the application site and a distance of 19.8m is proposed between it and block A, which would be two to five storey's. The daylight results for this property do not meet the BRE standards. In order to justify the shortfall, Anstey Horne have undertaken a comparison exercise to assess the daylight to the western elevation of Birchfields, which will remain unchanged by the proposed development. The aim of this is to show that the daylight that will be available to the eastern elevation (after reductions caused by the proposed development) will be comparable to those that are currently available to the western elevation.

The specialist consultant considers that the analysis of the results is fair and concludes that 'whilst reductions in daylight are greater than the BRE recommended level, the flats within 1-46 Birchfields will be left with good levels of daylight by an urban standard and will not actually be left with poor levels of natural illuminance'. The specialist consultant further considers that the impact of the proposed development will be moderate adverse to the flats that will experience reductions of more than 20% from existing but that is only by reference to the existing levels of daylight, not to the retained level which could be considered to be acceptable.

- 9 Masons Avenue

The BRE standards for daylight are met and the impact is therefore negligible.

- 15 Masons Avenue

The daylight standard is not met for the living room or the kitchen. The reductions are moderate adverse impact. The living room will be left with good levels of VSC by an urban standard, at 20.23%. The kitchen will be relatively poorly lit.

- 17 Masons Avenue

The daylight standard is not met for the bedroom and the living room. The

impact is moderate adverse. The living room will, however, be left with good levels of daylight for an urban location at 20.66%. The bedroom is still left with a VSC of 14.02% which is comparable with the existing daylight to the bedroom at No. 15.

- 19 Masons Avenue

The BRE standard is not met for the dining room and one bedroom. There is no effective change to the kitchen and bathroom. The impact is minor to moderate adverse and the rooms are still left with adequate levels of light by an urban standard.

- 21 Masons Avenue

The daylight standard is not met for the living room and kitchen. The impact is major adverse. The rooms are, however, left with good levels of daylight by an urban standard.

- 23 Masons Avenue

The daylight standard is not met for the dining room and bedroom. There is minimal impact to the kitchen. The impact is moderate to major adverse. The residents to this property will materially notice the change from the very good levels of daylight to moderate levels of daylight that will result.

- 25 Masons Avenue

There is a significant impact to this property with reductions of 43%-50% from existing daylight levels. This is therefore a major adverse impact. The levels of daylight that will be left at around 14.5% VSC-17.04% VSC are commensurate with a dense urban location rather than a suburban location. The reduction will be materially noticeable to these residents.

The daylight distribution results for this property, in particular, show that the perception of well day lit internal amenity will be materially reduced.

- 47 Masons Avenue

In this property only the results for the kitchen do not meet the BRE standard. This is only minor adverse impact.

- 22 Palmerston Road

This is a temple building not a residential building. This building will be left with very good levels of daylight and whilst one hallway area will experience a reduction of 33% from existing, the impact is negligible overall.

6.5.76 A sunlight assessment has only been carried out to 1-46 Birchfields and 22 Palmerston Road, being the only properties with windows that face within 90° of due south. The sunlight assessment is met for all windows and, in this regard the proposed development would have a negligible impact.

6.5.77 There are two other near-neighbouring buildings with windows facing towards the application site which have not been considered within the submitted report: Station House at No. 11 – 13 Masons Avenue and No. 49 Masons Avenue. Station House is a four storey building which has a lawful D1 use at ground floor level and is actively used as a place of worship whilst the first,



second and third floors of the building have a lawful B1 Office use. This is a commercial premises and is not considered to be as sensitive to change as a residential premises. No. 49 Masons Avenue is a mid-terrace dwelling which immediately adjoins No. 47 Masons Avenue. It is considered that the impacts of the proposed development on No. 49 Masons Avenue would be comparable to the impacts identified for No. 47. It is noted that the Anstey Horne assessment does not identify these premises as sensitive receptors that merit detailed testing of daylight/sunlight impacts. The Council's consultant has not objected to the non-testing of these premises.

6.5.78 As detailed above, it is clear that the proposal would result in some daylight impacts in relation to neighbouring properties. These impacts are regrettable, but are inevitable if the application site is to be redeveloped in a manner that effectively contributes to the supply of housing and to the re-provision of employment space on this site. It is acknowledged that there may be permutations of alternative building massing and site layout that might have a lesser impacts. However, it is not known whether these alternatives would deliver the range of planning objectives for the site to the same extent as the subject proposal.

6.5.79 Policy DM1 of the Local Plan undertakes to assess amenity having regard to, *inter alia*: the prevailing character of amenity and the need to make effective use of land; and the adequacy of light and outlook within buildings (habitable rooms and kitchens). Taking into account the conclusions of the specialist consultant, the extent and degree of daylight and sunlight losses that would occur, and the need to balance the efficient use of this allocated, previously developed site, it is concluded that the proposal would maintain an appropriately high standard of amenity for neighbouring residential occupiers.

- *External noise, air quality and light pollution*

6.5.80 The application has been accompanied by detailed assessments of noise and air quality impacts, including those temporary impacts likely to arise during the construction phase of the proposed development. These assessments are appraised elsewhere within this report. This section focuses on the potential amenity impacts following the completion of the proposed development.

6.5.81 The revised plans and supporting documentation propose one on-site servicing and delivery bay within the basement and two off-site servicing and delivery bays. These off-site bays would be provided in the form of inset loading bays; one to the east of the roundabout and one on Masons Avenue. The most significant servicing activities would be likely to include weekly waste and recycling collections, and deliveries in connection with the proposed commercial uses. Potentially more frequent but less intrusive activities would be likely to include parcel deliveries, removal lorries & etc. and, again, these would be directed to use the loading bay. It is envisaged that noise and any vibration/dust/fumes/light pollution would not be beyond that which may be expected within such an urban environment.

6.5.82 The proposal would bring about a change in activity at the application site. Consequently, existing neighbouring occupiers would inevitably experience

some changes to amenity (as discussed above). However, as a whole, it is considered that the redevelopment of the site would contribute positively to the perception of Wealdstone District Centre.

6.5.83 In terms of commercial / community activity, a general hours of use condition in respect of the commercial premises is proposed. Details of possible advertisements for the proposed commercial uses have not been submitted. In the event that illuminated advertisements are required, any impacts upon amenity would be assessed as part of any application for advertisement consent.

6.5.84 Details of lighting have not been submitted for consideration. There is no reason to believe that lighting of the public realm and other areas within the development would cause any significant nuisance to neighbouring occupiers. It is therefore proposed to control, as a condition of any planning permission, details of lighting associated with the development.

6.5.85 It is proposed to control, as a condition of any planning permission, details of the ventilation/extraction equipment and other plant associated with the development, to ensure that any noise, exhaust and vibration is mitigated and does not give to unreasonable nuisance to residential occupiers within or surrounding the development.

- *Amenity Impacts of the Proposed Commercial Uses*

6.5.86 The Mayor of London's SPG recognises that certain town centre uses raise amenity issues and Local Plan Policies AAP 18 and DM 41 include criteria requiring the consideration of impacts of uses proposed upon neighbouring residential occupiers. Policy DM 1 *Achieving a High Standard of Development* requires consideration of the amenity impact of a proposed use/activity in terms noise (including hours of operation), vibration, dust, air quality and light pollution.

6.5.87 It is considered necessary to exercise control of certain aspects of the retail / commercial / community uses to ensure reasonable compatibility between those uses and the living conditions of occupiers residing within and surrounding the development. To this end, a condition is recommended that would require the Council's prior approval of: the use of amplified sound; any plant and/or other machinery (including but not limited to air condition units and air extraction units); and the provision of furniture and/or equipment associated with the extension of commercial activity outside of the building. It is also considered necessary to control the hours of use of the ground floor commercial premises as a condition of any planning permission.

6.5.88 In addition, it is recommended that the condition would require notification to/the Council's prior approval of any use falling within Class D1. This is because some uses that could fall within this class may raise unforeseen amenity issues that require specific, tailored controls or that may involve activates not compatible with a higher density residential environment.

6.5.89 It should be noted that the above amenity impact controls would only apply in respect of the first use of the proposed commercial floorspace. Subsequent changes of use (other than those permitted under the aforementioned or any replacement Order) and any associated operational development would require planning permission in their own right, allowing the consideration of amenity and any other impacts through the normal planning application route.

## 6.6 TRANSPORT AND PARKING CONSIDERATIONS

6.6.1 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), a Travel Plan and a Delivery and Servicing Plan (DSP) have been submitted in support of the planning application. Each of these documents were updated during the course of the planning application, following concerns raised by the Local Highways Authority and by Transport for London (TfL).

6.6.2 The NPPF sets out the overarching planning policies on the delivery of sustainable development through the planning system. It emphasises the importance of reducing the need to travel, and encouraging public transport provision to secure new sustainable patterns of transport use.

6.6.3 London Plan Policy 6.3 *Assessing Effects of Development on Transport Capacity* requires the impact of proposals on transport capacity and the transport network to be assessed, and states that development should not adversely affect safety on the transport network. In addition to Transport Assessments and Travel Plans, the policy goes on to call for construction logistics plans and delivery & servicing plans to be secured. Policy 6.10 *Walking* seeks high quality pedestrian environments within development proposals. Local Plan Policy AAP 19 *Transport, Parking and Access within the Heart of Harrow* requires all major development to prioritise access by sustainable modes, with particular emphasis on the provision of safe and attractive walking routes to facilities and public transport.

6.6.4 The application site is surrounded by a busy highway network. In particular, it is located immediately south of the George Gange Way / Palmerston Road roundabout and immediately north of Masons Avenue, a well trafficked route within Wealdstone. The George Gange Way flyover (the A409) traverses the site. The western part of the application site lies within the town centre boundary and as such there are a good range of services and amenities within close proximity to the site. Harrow and Wealdstone Station is located 270m south-west of the site and there are seven bus routes within 200m of the site. The application site has a PTAL rating of 5 to 6a, which is equivalent to Very Good accessibility.

### Access, Highways and Public Transport

6.6.5 Currently the site has three main access points; one to the west of the Palmerston Road / George Gange Way roundabout; one to the east of this roundabout and one at the south of the site from Masons Avenue. The comprehensive redevelopment of the site will replace these vehicular access

points with one main vehicular access from Palmerston Road to the basement carpark (west of the roundabout) and one secondary emergency access point from Masons Avenue.

- 6.6.6 The application site is surrounded by a busy highway network, and it is acknowledged that this poses some constraints in terms of vehicular entry to and exit from the site. The proposed location of the vehicular access to the basement is deemed to be appropriate, as it is considered that vehicles exiting the roundabout generally travel at a reduced speed when compared to the speed travelled by vehicles approaching the roundabout (east of the roundabout). The proposal to close vehicular access to the east of the roundabout is therefore welcomed by the Highways Authority. The proposal is for a 'left-turn' movement only when exiting the basement. The provision of a raised table crossing point is proposed at the entrance to the basement. This is to improve pedestrian accessibility and safety at this busy junction. These works would need to be facilitated through a section 278 agreement and this will be required by a section 106 agreement.
- 6.6.7 Given that the proposed vehicular access from Masons Avenue will be used for emergency purposes, it is envisaged that this will not be used on a regular basis. Neither the Highways Authority of TfL have expressed any concerns in relation to this proposed arrangement.
- 6.6.8 The submitted Transport Assessment identifies that there would be a small reduction in the number of trips generated by the proposed development in the peak hours. The Highways Authority initially queried the data used as a baseline for this aspect of the proposal. However, the addendum to the Transport Assessment has provided clarity on this matter and the Highways Authority is satisfied with the information, subject to the submission of surveys at six months post occupation to form the baseline data for the Travel Plan. If figures vary greatly from the current anticipated levels, targets within the Travel Plan will need to be amended accordingly. TfL have not raised any concerns in relation to trip generation.
- 6.6.9 TfL considers that the capacity of Harrow and Wealdstone Station would not be negatively impacted by the proposed development. Following some initial concerns in relation to the capacity of the bus network to serve the proposed development, TfL have advised that new data has been further analysed and it is concluded that bus capacity is currently sufficient in the area. Thus, mitigation measures are not required in this instance.

#### Delivery and Servicing

- 6.6.10 Delivery and servicing was the subject of much discussion before and during the application process. The submitted servicing and delivery plan asserts that there is likely to be 14 vehicles servicing the residential component of the development each day, and that most movement would be by a small van or transit van. It further asserts that there is likely to be 21 vehicles servicing the commercial component of the development each day. Most of these movements would be by van, by small car or by transit van. In addition to weekly refuse collection, a total of 35 daily trips are estimated for servicing and

deliveries.

- 6.6.11 The initial submission documents proposed two on-site servicing and delivery bays; one within the basement carpark and onsite one off Masons Avenue, between the two units which comprise the Hub building. This proposal was generally supported by TfL. However, concerns were raised internally in relation to the impact of this arrangement on the placemaking credentials of the development and on pedestrian safety. In particular, it was considered that there would be significant conflict between pedestrian and vehicular activity at a main entrance to the site. On this basis, the applicant was advised by officers to reconsider the servicing and delivery arrangements for the site.
- 6.6.12 The revised plans and supporting documentation propose one on-site servicing and delivery bay within the basement and two off-site servicing and delivery bays. These off-site bays would be provided in the form of inset loading bays; one to the east of the roundabout and one on Masons Avenue.
- 6.6.13 All three bays could be used for general servicing and delivery vehicles, such as home deliveries, commercial deliveries etc. Refuse collection would take place from the inset bay on Masons Avenue only. All the refuse bins for the site would be stored at surface level. The main refuse store for residential bins would be within the rear part of block E, and smaller refuse stores for residential bins would be within parts of the ground floors of blocks A, B and C. Origin Housing have advised that they will be adopting a private management plan whereby an on-site manager will rotate empty/full bins from the main refuse store to smaller refuse stores as necessary. The main refuse store for commercial bins would be located adjacent to block D. The private management plan would also ensure that the on-site manager would transport all bins to an on-site collection point close to the Masons Avenue entrance on collection days. The proposed inset parking bay would enable refuse collection vehicles to stop up off the highway on refuse collection days (once weekly). It is noted that refuse collection vehicles currently use the highway to service properties along Masons Avenue.
- 6.6.14 TfL raised concerns in relation to the impacts of this proposed servicing arrangement on the highway network, noting that two inset bays cannot be legally reserved for the exclusive use of the development and these spaces could feasibly be occupied by other vehicles at any point during the day. TfL also raised concerns in relation to the proximity of the proposed inset bay on Palmerston Road to an existing bus stop
- 6.6.15 The Highways Authority have considered the proposals and the comments provided by TfL, and acknowledge that it would be preferable to undertake servicing, deliveries and refuse collection on-site rather than using any part of the public highway. However, recognising the physical limitations of this location and the need to balance traffic flow and improved pedestrian environment, the Highways Authority consider that the revised servicing proposals represent a feasible compromise solution. In particular, and as shown on the submitted tracking plans, the Highways Authority have advised that the proposed inset bays would formalise loading activity and would ensure that larger vehicles are kept out of the main flow of traffic on both Palmerston

Road and Masons Avenue. Furthermore, the Councils Highways engineer has taken measurements on site and is confident that the proposed inset bay on Palmerston Road can be accommodated without moving the existing bus stop. In order to facilitate the proposed inset parking bays on Masons Avenue and Palmerston Road, some amendments to the existing public highway will be required. These works would need to be facilitated through a section 278 agreement. Following receipt of additional information, TfL have advised that they do not object to the servicing proposal, provided that the minimum unrestricted 2m public footway specified in the Council's comments is maintained at all times of the day.

- 6.6.16 Both TfL and the Highways Authority have expressed concerns in relation to the practicalities of the proposed servicing bay within the basement. These particular, concerns relate to the layout of the basement and the lack of detail on how visiting delivery drivers gain access to the basement. As discussed in the next section of the report (relating to parking), the layout of the basement has been amended and this has been considered, on balance, to be acceptable by the Local Highway Authority. Furthermore, it is considered that an appropriately worded planning condition could secure details relating to an intercom system for entry to the basement. The proposed refuse and recycling strategy has been referred to the Councils Refuse and Waste department who have not raised any objection to the proposals.
- 6.6.17 The initial concerns raised by TfL in relation to servicing are acknowledged and understood. However, having regard to the constraints of the site and having considered the initial (alternative) servicing arrangement which itself raised significant planning concerns, it is considered on balance that the proposed servicing arrangement can be accepted.
- 6.6.18 The applicant has submitted a Framework Delivery and Servicing Plan (DSP) which is generally considered to be acceptable, subject to securing a final version of the plan prior to the occupation of the development. As such, a condition is recommended in relation to this.

#### Cycle and Car Parking Provision

- 6.6.19 London Plan Policies 6.9 *Cycling* and 6.13 *Parking* give effect to the London Plan cycle and vehicle parking standards, including requirements for electric vehicle charging points (ECPs), parking for 'blue badge' holders and for cycle parking in particular to be secure, integrated and accessible. Policy AAP 19 of the AAP seeks to limit on site car parking and development proposals to support the use of sustainable modes of transport, in particular in areas that have a high level of public transport accessibility. Policy AAP 20 (Harrow and Wealdstone Green Travel Plan) seeks to ensure that all major developments produce a site specific travel plan to demonstrate how the development would meet the wide Green Travel Plan provisions.
- 6.6.20 The application site is located in a highly accessible location, with good access to public transport, both rail and bus services. It is noted that many of the comments received in response to the consultation process have raised concerns about the level of parking proposed and the impact of this on the

availability of parking in the area.

- 6.6.21 Onsite carparking provision is proposed at basement level. The initial submission proposed 71 carparking spaces. Following concerns raised by both TfL and the Councils Highways Authority in relation to the practicalities of the proposed basement layout, the layout of the proposed basement has been revisited. This has necessitated a reduction in on-site car parking spaces to 69, including 31 stacker car parking spaces. Of these, 4 are disabled person's parking spaces for the commercial uses and 65 are for the proposed residential element. 19 disabled bays at a 1:1 ratio for wheelchair accessible homes and 6 motorcycle parking spaces are proposed. It is proposed that 14 of the total parking spaces provided would have electric vehicle charging points (active provision), and a further 14 spaces would be capable of future provision (passive provision). These proposals would accord with the requirements of the London Plan (2016).
- 6.6.22 Due to the location of the culvert which traverses site, the basement has an awkward layout, which results in the provision of slightly awkward carparking bays. The Highways Authority has commented on the revised basement layout and has advised that the two bays that have been removed were poorly positioned and that it is possible that these bays may not have been used or would have prevented the use of other bays. The Highways Authority remain concerned in relation to the layout of some of the proposed parking bays, commenting that some of the bays may prove difficult to use by disabled drivers. These concerns are acknowledged. However, the Highways Authority acknowledge that further revisions to the basement layout are likely to result in the reduction of more carparking spaces. The loss of further carparking spaces is not desirable. Having regard to site constraints, it is considered on balance that the layout of the basement can be accepted.
- 6.6.23 The Highways Authority have advised that the 'level of provision of parking spaces is considered acceptable given the good public transport accessibility at this location'. In order to ensure that overspill parking does not adversely impact on the already pressured surrounding streets, the Highways Authority have requested that 'residents of the development would be restricted from eligibility for resident parking permits by way of a suitable condition and s106 agreement' and that 'measures to encourage sustainable transport use should be conditioned and subject to a s106 agreement'. The Highways Authority have requested the submission of a parking management plan to explain how parking spaces will be allocated and enforced.
- 6.6.24 When considering the proposal for 71 carparking spaces, TfL stated in their response that 'the proposed parking levels could be lower still and not result in overspill'. TfL have however recommended that a car parking management plan is secured by planning condition to ensure that carparking spaces are allocated to larger family units and wheelchair accessible dwellings and to ensure that one-bed flats are not allocated car parking spaces.
- 6.6.25 A total of 330 cycle parking spaces are proposed (307 for residents and 22 for commercial units). This would comply with the requirements of the London Plan 2016. 172 spaces would be provided within the proposed basement; 116

spaces would be provided within the ground floor units of blocks B and C; 42 spaces would be delivered within 21 Sheffield stands at surface level. The submission documents indicate where cycle storage for each block and for the proposed commercial units would be stored. It is considered that the proposal shown on the submitted plans would not be wholly appropriate and that this could be improved upon. In particular, some bicycle spaces would be sited a considerable distance from the proposed residential units. A planning condition is therefore suggested to ensure that the allocation of bicycles spaces is more convenient for residential occupiers.

- 6.6.26 The applicant has provided amended details for the entrance to the basement which included a separate dedicated access for cyclists. The Council's Highways Officer has commented on this and has advised that the proposal shows the ramp as a gradient of 1 in 10 which is a bit steep for some cyclists particularly as there is no area to allow a cyclist to gather momentum to make the uphill journey. It is likely that some cyclists would end up pushing their bicycle uphill resulting in them walking in a live carriageway. London Cycle Design Standards recommend a maximum gradient of 1 in 20. The plan shows a 1.5m cycle lane on the 5.7m wide ramp which is insufficient width to allow two cycles and two cars to pass each other. It is accepted that the number of car movements are likely to be fairly low, however a wider ramp, with segregation for cyclists would be safer. These concerns are acknowledged. It is clear that the provision of a cycle ramp has created issues that cannot be feasibly resolved within the current layout. TfL has recommended the application of a condition relating to the elevation/gradient of the ramp and details of measures to reduce vehicle speeds and prioritise safety for the shared use of this ramp (motor traffic, servicing and cycles). It is considered that this suggested condition is necessary to ensure the safety of users of the access ramp.
- 6.6.27 Policy AAP 19 encourages the implementation of car club schemes within the Heart of Harrow. It seeks provision for car club vehicles within major development proposals and states that such provision should be prioritised alongside the provision of disabled persons' parking. A car club bay is proposed along Masons Avenue. It is recommended that its provision be secured as part of a Planning Obligation.
- 6.6.28 The Council's Travel Plan Coordinator (TPC) has reviewed the submitted Travel Plan and the objectives and targets contained within. The TPC has recommended a number of changes to the Travel Plan and has recommended that the monitoring of this to be secured through a section 106 obligation. In addition to this, recommendation has been made to impose financial penalties should the target agreed in the travel plan not be met within the monitoring period. In order to ensure robust monitoring and effective mitigation of associated transport impacts arising from the development, it is recommended that a final version of the Travel Plan with set monitoring periods and associated travel plan bond should be secured by section 106 obligations.
- 6.6.29 Concerns raised by neighbours in relation to traffic and parking congestion are acknowledged. However, having regard to the high public transport accessibility at this location and subject to the above mentioned planning



conditions and s106 obligations, the proposed carparking and cycle parking provision is considered to be acceptable.

### Walking / Cycling

- 6.6.30 Policy AAP19 requires all major development proposals to prioritise access by sustainable modes, with particular emphasis on the provision of safe and attractive walking routes to nearby facilities and to public transport.
- 6.6.31 As stated earlier in this report, it is considered that the proposal would provide a high quality, inclusive and legible route within Wealdstone District Centre, which would increase pedestrian and cyclist permeability in the area. This in turn would strengthen the spatial definition of this part of Wealdstone, as required by the site allocation.
- 6.6.32 In response to TfL comments, the applicant has submitted a PERS report (Pedestrian Environment Review System) and a CERS report (Cycling Environment Review System). These reports make a number of recommendations to improve pedestrian and cyclist comfort in the area. The PERS report recommends design/access/paving improvements. The CERS report suggests re-applying road markings. Having considered these submissions, TfL have recommended that the Council seek and secure the suggested improvements through s106 and s278, as appropriate. TfL have also recommended that funding for public realm improvements are secured. The Highways Authority concurs with this and have advised that a sum of money should be secured by s106 agreement towards improvement of facilities in the local area.

### *Conclusion*

- 6.6.33 During the construction period, it will be necessary to manage and mitigate any temporary impacts on highway and bus services. Planning conditions are therefore recommended to secure a Construction Management Plan (CMP) and a Construction Logistics Plan in order to ensure there would be no adverse highways impacts during the construction process.
- 6.6.34 Overall, and subject to the planning conditions and s106 obligations mentioned above, it is considered that the transport impacts of the proposal are acceptable and that the proposal would comply with the aims and objectives of the above stated planning policies.

## 6.7 **HERITAGE AND ECOLOGICAL CONSIDERATIONS**

### Heritage Assets

- 6.7.1 Paragraph 128 of the NPPF states that the local planning authority should require an applicant to describe the significance of any heritage asset affected, including any contribution made by their setting. This requirement has been fulfilled within the submitted Conservation Statement (received during the course of the planning application).

6.7.2 Paragraph 129 of the NPPF states that:

“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal”.

6.7.3 The NPPF definition of designated heritage assets includes statutory listed buildings, registered parks & gardens and conservation areas.

6.7.4 London Plan Policy 7.8 *Heritage Assets and Archaeology* states that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate, and that development affecting heritage assets and their settings should conserve their significance by being sympathetic to their form, scale, materials and architectural detail. Local Plan Policy DM7 *Heritage Assets* states that the conservation of heritage assets will be afforded priority over other policies when assessing proposals affecting heritage assets, and sets out detailed criteria for the consideration such proposals. Also relevant is the Harrow-on-the-Hill Conservation Areas SPD (2008).

6.7.5 The application site does not contain or adjoin any listed buildings and is not within a conservation area. The applicant’s Conservation Statement identifies one Listed Building within the vicinity of the site – The Grade II Listed Harrow and Wealdstone railway station which is approximately 110m from the application site. It concludes that the impact of the proposal upon this identified heritage asset is limited. The main reason for this is that the significance of the Grade II Listed Harrow and Wealdstone railway station is within the station itself rather than within its setting.

6.7.6 In terms of other designated heritage assets, the Conservation Statement also identifies two Locally Listed Buildings – No. 21 The Bridge and No. 36 High Street. The submitted Conservation Statement has not found any negative impacts on these Locally Listed Buildings.

6.7.7 A number of visuals have been submitted to illustrate the applicant’s conclusion on this matter, and this has been considered by the Council’s Conservation Officer who has not raised any objection to the proposal.

6.7.8 As stated elsewhere in this report, the application site lies within a Wider Setting Consultation Area of two protected views:

- Roxborough Road Footbridge, View of Harrow Weald Ridge
- Proposed Country Park at Wood Farm Proposed Country Park at Wood Farm

6.7.9 It is important to note that the viewing location at Wood Farm provides views towards Harrow-on-the-Hill Conservation Area and St. Mary’s Church, a Grade

I Listed Building. As concluded elsewhere in this report, the proposal would not have an adverse impact on the protected views of these heritage assets.

- 6.7.10 It is acknowledged that the proposed development would represent a distinctive feature in the skyline. However, given its siting in relation to nearby heritage assets, the low lying levels of the site, and the acceptable design and appearance of the buildings, it is considered that the historic and architectural features of these heritage assets would be preserved. The proposal would therefore comply with the policy guidance set out in the National Planning Policy Framework, policy 7.8 of The London Plan (2016), Core Policy CS 1(B) of The Harrow Core Strategy and policy DM7 of the Harrow Development Management Policies Local Plan (2013).

#### Areas of Special Character

- 6.7.11 Harrow Weald Ridge is designated in the Local Plan as an area of special character. The designation reflects the special contribution that this elevated topographical feature makes to the character of the Borough. Harrow Weald Ridge's designation reflects the visual significance that its tree cover and open countryside provides as a landscape backdrop to the Borough's lowland townscape.
- 6.7.12 The Core Strategy provides a commitment to maintain the special character of this area. Local Plan Policy DM6 *Areas of Special Character* sets out criteria for the consideration of proposals affecting an area of special character
- 6.7.13 It is considered that the proposal would not diminish the strategic value of the Harrow Weald Ridge area of special character. Whilst the proposed tall buildings would be apparent as tall, landmark features in their setting, the area of special character would remain clearly distinguishable as the dominant topographical features within the wider landscape of the Borough.
- 6.7.14 The policy refers to the environmental, architectural, historic and landscape features of the areas of special character. Since the application site does not itself fall within the areas of special character, its redevelopment would not lead to any direct loss or damage to any of these features and so, it is considered, those features would be preserved.
- 6.7.15 The impact of the proposal upon protected views is appraised elsewhere in this report and is considered to be acceptable.

#### Ecology, Biodiversity and Trees

- 6.7.16 By inference, the NPPF emphasises that one of the best ways to conserve the natural environment is to encourage the effective use of land by re-using previously-developed land to meet development needs. Paragraph 118 of the NPPF sets out the principles for conserving and enhancing biodiversity, which include resisting development that would: (i) cause significant harm that cannot be avoided, mitigated or compensated-for; or (ii) have an adverse affect on a Site of Special Scientific Interest (SSSI). Opportunities to incorporate biodiversity in and around developments are encouraged.

- 6.7.17 There are no statutory designated wildlife sites within 2km of the site and it is unlikely that the proposal would have negative impacts upon such sites further afield. There is one Site of Importance for Nature Conservation (SINCs) within a 1km radius of the site. However the application site is well isolated from this SINC with Harrow Leisure Centre, dwellings and other buildings and highways providing intervening barriers. The proposal is therefore unlikely to significantly increase background disturbance levels at this site.
- 6.7.18 London Plan Policy 7.19 *Biodiversity and Access to Nature* echoes the need for development proposals to make a positive contribution to biodiversity, to protect statutory sites, species and habitats, and to help achieve Biodiversity Action Plan targets. Local Plan Policy AAP 12 *Improving Access to Nature* requires all major development proposals to incorporate features that support the protection, enhancement, creation and management of biodiversity within the Heart of Harrow.
- 6.7.19 The submitted Design and Access statement advises that a number of measures will be incorporated into the scheme:
- Planting of a native species which support wildlife;
  - Both herbaceous and tree species which attract pollinators will be included to encourage bees and butterflies;
  - Nesting boxes will be installed on block E and the roofs of the lower blocks
  - Hit-and-miss brick panels in block A will provide shelter for insects and other invertebrates;
  - Permeable surfaces will allow natural infiltration into the soil, encouraging invertebrate species.
- 6.7.20 Details relating to these individual elements have not been provided. However, it is considered that the proposals are realistic and capable of being implemented on site. On this basis, an appropriately worded condition is recommended to secure details of these enhancement measures prior to the commencement of development.
- 6.7.21 In addition to the measures that have been put forward within in the Design and Access Statement, it is noted that the revised drawings that were submitted during the course of the planning application have proposed a green roof on the lower part of block A and on part of block D. This is considered to be a positive amendment to the scheme as green roofs can bring benefits to urbanised area other than biodiversity enhancements. These benefits include absorption of rainfall, improvement to the thermal performance of buildings, reduction in the urban heat island effect, improvement in the appearance of a development and assistance to adapt local environments to climate change. It is considered that details of the proposed green roof may be secured as part of appropriately worded landscaping conditions.

It is noted that there are some trees present on the application site and a neighbouring occupier has commented on the loss of these trees. A tree report has not accompanied the planning application. It is noted that the existing trees are not protected by a Tree Preservation Order. Whilst the loss of trees is

regrettable, it is considered that there is scope to plant new trees as part of the landscaping scheme that is required to come forward by planning condition.

## 6.8 CLIMATE CHANGE AND ENVIRONMENTAL CONSIDERATIONS

### Flood Risk and Sustainable Drainage

- 6.8.1 The application site is located within EA flood zone 2 (medium probability of flooding) and 3 (high probability of flooding). The Harrow Strategic Flood Risk Assessment (SFRA) shows that part of the site lies within flood zone 3a and part of the site lies within flood zone 3b which forms part of the functional flood plain, defined as having a high probability of flooding. The Harrow SFRA is based upon detailed, local modelling of flood risk. In addition to this, the Wealdstone Brook culvert traverses the southern side of the site (north of the proposed Hub building and the properties along Masons Avenue, and south of the proposed blocks A, B, C and E). The Wealdstone Brook is a main river that flows through underground culverts from Harrow Weald, through Wealdstone and Kenton, and into the London Borough of Brent.
- 6.8.2 The NPPF states that a site-specific flood risk assessment (FRA) is required for all proposals for new development in Flood Zones 2 and 3. The applicant has submitted an FRA for consideration, which has been updated through the course of the planning application through the submission of an addendum.
- 6.8.3 Paragraph 103 of the NPPF states that, when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere. London Plan Policy 5.12 *Flood Risk Management* requires development proposals to comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical guidance on flood risk over the lifetime of the development. It states that development proposals must have regard to measures proposed in Catchment Flood Management Plans. It is noted that the EA's Thames Catchment Flood Management Plan (2009) focuses on the adaptation of the urban environment to increase resistance and resilience to flood water, and that this objective informed the preparation of Harrow's Local Plan policies on flood risk management.
- 6.8.4 Core Strategy Policy CS1 U undertakes to manage development to achieve an overall reduction in flood risk and increased resilience to flood events. It includes a commitment to maintain the capacity of the functional floodplain within greenfield sites and seeks opportunities to re-instate the functional floodplain on previously developed sites.
- 6.8.5 Local Plan Policy AAP 9.B *Flood Risk and Sustainable Drainage* calls for proposals and on allocated sites requiring a Flood Risk Assessment to demonstrate that the development is designed and laid out to be resistant, resilient and safe from all sources of flooding and there is a net flood risk reduction. Importantly, the policy does not require development proposals on allocated sites to undergo sequential or exception testing. The reason for this is that allocated sites have already been the subject of sequential and (where relevant) exception testing through the development plan process.

6.8.6 Policy AAP 9.B provides specific design criteria to ensure that developments are designed and laid out to be resistant, resilient and safe from all sources of flooding and to ensure that there is a net flood risk reduction. In accordance with these criteria, the addendum to the FRA confirms that:

- Finished floor levels for the residential element would be at least 300mm above the 1 in 100 flood level of 52.08m AOD.
- It is noted that a similar finished floor level would not be achieved for the commercial element, and as such the FRA notes that these units could experience some flooding during a 1 in 100 fluvial event. The FRA therefore recommends that a flood resilient approach is adopted for these commercial units. In particular, the FRA has recommended that a Flood Evacuation Plan is prepared for the proposed development and provided to all residents and staff as a precautionary measure. The FRA also recommends that the commercial premises in the highest risk areas are closed and evacuated in the event that a Flood Warning is issued.
- The submitted plans show that a 5m distance is proposed between the existing culvert and the proposed basement, and the proposal does not proposed any form of habitable accommodation within the proposed basement. The proposal thereby demonstrates that the layout of the proposed basement has specifically addressed flood risk.

6.8.7 Policy AAP 9.C requires major development to: reduce surface water run-off; utilise sustainable drainage systems; ensure adequate arrangements for management and maintenance of on-site infrastructure; use appropriate measures to prevent water pollution; and where appropriate, demonstrate that the proposal would be resistant and resilient to flooding from all sources.

- *Reduce surface water run-off*

6.8.8 London Plan Policy 5.13 *Sustainable Drainage* states that development should aim to achieve greenfield run-off rates and this objective is reiterated in Local Plan Policy AAP 9.

6.8.9 The FRA states that the existing surface water run-off rate is calculated as 96.15 litres per second. The initial submission documents proposed a surface water run-off rate of 19.69 litres per second, which raised concerns for the Council's Drainage department. Following discussions and re-consideration of the attenuation tank below Block D, the applicant has confirmed that the surface water run-off rate for the entire site would be 5 litres per second:

- Blocks A & B and external areas = 2 l/s
- Blocks C & E and external areas = 2 l/s
- Block D and external areas = 1 l/s

6.8.10 The Council's Drainage Team has advised that this reduction in surface water run-off is acceptable for the site.

- *Utilise sustainable drainage systems*

6.8.11 Both the London Plan and Harrow's Core Strategy seek to achieve greenfield rainwater run-off rates from new development through the integration and deployment of sustainable urban drainage systems (SUDS). The objective is to help restore a more natural response to rainfall within river catchments, and to address/prevent localised surface water flooding.

6.8.12 London Plan Policy 5.13 sets out a hierarchy of sustainable drainage measures, with the aim of managing surface water run-off as close to source as possible. Policy 5.11 *Green Roofs and Development Site Environs* calls for major developments to incorporate green roofs where feasible and Policy 5.15 *Water Use and Supplies* identifies rainwater harvesting as one of the methods that can help to conserve potable water. The applicant's FRA has considered various SUDS and concludes that infiltration devices are unlikely to be suitable for this site due to the underlying geology of the clay and the proposal for a basement carpark on the western side of the flyover. The FRA goes on to state that the most likely means of attenuating the run-off would be through the use of living roofs, lined pervious surfacing and attenuation tanks. The submitted FRA erroneously refers to the provision of a brown roof on block E. This is clarified in a letter (dated 22<sup>nd</sup> September) from the applicant's drainage consultant. It states that the provision of three subterranean attenuation tanks is the main sustainable urban drainage feature proposed. A green roof provided on the lower element of block E and the eastern part of block D would serve as supplementary sustainable urban drainage features.

6.8.13 The Council's drainage team has expressed satisfaction with the sustainable drainage strategy, subject to appropriately worded conditions, including the submission of details of the proposed green roofs.

- *Ensure adequate management and maintenance arrangements*

6.8.14 The submitted FRA advises that floodplain compensation is required where the proposed Hub building would be located, but that this needs to be provided in the form of voids. These voids would provide suitable compensation by retaining the existing flowpaths. Although the use of voids is not generally a preferable option, it is noted in this instance that both the EA and the Councils Drainage Department have accepted this proposal. In particular, the EA have advised that 'in this case, the applicant has modelled the flood risk on site and adequately justified why traditional level for level volume for volume floodplain compensation cannot be provided'. However, the EA have expressed the need for maintenance of the void to ensure that it does not become blocked over time and potentially pose a flood risk. The applicant has suggested that a maintenance strategy for the void be secured by way of a legal agreement, and the EA have agreed with this proposal.

6.8.15 Details of the proposed arrangements for the future management and maintenance of other parts of the drainage system have not been submitted with the application. However, it is considered that this can be secured as a condition of any planning permission.

- *Prevent water pollution*

6.8.16 The applicant's FRA does not provide details of measures to prevent water pollution. It is noted that the Council's drainage team has expressed satisfaction with the applicant's FRA as a whole, and it is considered that such details can be secured as a condition of any planning permission to prevent the spread of any pollutants from the on-site drainage system.

- *Where appropriate, demonstrate resistance and resilience to all sources flooding*

6.8.17 The applicant's FRA advises that the primary flood risk to the site is considered to be a fluvial risk resulting from the manholes within the site boundary surcharging, and that all other flood sources at the site are not considered to pose significant risks.

6.8.18 The layout of the proposed development has placed the 'less vulnerable' uses (commercial floorspace) in Flood Zone 3a, with the 'more vulnerable' uses (residential) a minimum of 300mm above the 1 in 100 year (+20%) modelled flood level. Site specific mitigation measures and sustainable urban drainage systems are proposed within the FRA and accompanying addendum.

6.8.19 The EA and the Council's Drainage Department have not raised any objection to the proposal subject to appropriately worded conditions. The implications of the proposed development for sewerage infrastructure are addressed elsewhere in this report.

#### Carbon Dioxide Emissions Reductions

6.8.20 The NPPF (paragraph 96) requires new development to comply with adopted local policies on decentralised energy supply and to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

6.8.21 London Plan Policy 5.2 *Minimising Carbon Dioxide Emissions* applies the following hierarchy for the reduction of carbon dioxide emissions from new development: use less energy; supply energy more efficiently; and use renewable energy. The policy goes on to set out carbon dioxide reduction targets for residential and non-residential development, and requires detailed energy assessments to be submitted with applications for major development.

6.8.22 The application satisfies the London Plan requirement for energy assessment by the submission of an Energy Strategy.

- *CO2 Reduction Target*

6.8.23 At the time of the submission of the planning application, the London Plan carbon dioxide reduction target for residential and non-domestic buildings during the period 2013-2016 is to achieve a 40% improvement on the 2010 Building Regulations. This is equivalent to a 35% improvement upon the requirements of the 2013 Building Regulations



6.8.24 The Energy Strategy details a range of methods, relative to the London Plan energy hierarchy, that would achieve a combined improvement of **37%** upon the requirements of the 2013 Building Regulations, as set out below.

- *use less energy (lean measures)*

6.8.25 The Energy Strategy attributes CO2 savings of **8%** from measures that would reduce energy demand on the site. The CO2 reduction would be achieved from: measures incorporated into the building fabric such as types of floors, walls, party walls, roofs, windows and doors that are used in each of the blocks; the use of energy efficient mechanical ventilation; the use of low energy lighting and ensuring attention to details during construction to achieve low air permeability and to prevent thermal bridging.

- *supply energy more efficiently (clean measures)*

6.8.26 The Energy Strategy attributes CO2 savings of **28%** from the installation of a gas powered Combined Heat and Power (CHP) network, which the Energy Statement Addendum states is capable of being connected to any future district wide CHP. The CHP network would provide a heat and power source to all of the buildings except block D, which is not feasible due to the presence of the culvert. Therefore Block D is to be serviced as a standalone block, connected directly to the utility companies for gas, water and electrical supplies.

- *use renewable energy (green measures)*

6.8.27 The Energy Strategy attributes CO2 savings of **12%** from the use of renewable energy. Specifically, approximately 200 photovoltaic (PV) panels are proposed on the roofs of the taller elements of blocks B and C that would make a contribution to site's the electricity supply.

6.8.28 On October 1<sup>st</sup> 2016 (during the course of the planning application), a zero carbon policy requirement came into force on all residential development (policy 5.2 of the London Plan). The GLA have confirmed that this requirement applies to all Stage 1 referrals received by the Mayor on or after 1<sup>st</sup> October 2016. The Mayor considered the stage 1 referral on this particular planning application in July and as such, is satisfied for this proposal to meet the 35% improvement upon the requirements of the 2013 Building Regulations. Nonetheless, the applicant has submitted a letter setting out why zero carbon cannot be achieved on the proposed development. It states that the proposed development has been on-going for nearly two years and concludes that 'if zero carbon were to be achieved for development of the site, it would undoubtedly require a fundamental redesign of the scheme affecting the quantum of development and the viability of the scheme'. These conclusions are noted. Having particular regard to this and the GLA's position on this matter, it is considered that the proposal as submitted can be accepted.

## Sustainable Design and Construction

6.8.29 As noted above, the NPPF requires new development to comply with adopted local policies on decentralised energy supply and to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption. London Plan Policy 5.3 *Sustainable Design and Construction* requires development proposals to meet the minimum standards outlined in the Mayor's SPG and sets out the principles for sustainable design and construction. Local Plan Policy DM12 *Sustainable Design and Layout* sets out Harrow's local requirements and these are incorporated into the appraisal below.

- *Minimising carbon dioxide emissions across the site*

6.8.30 As noted above, the proposed CO2 emission reductions are considered to be acceptable.

- *Avoiding internal overheating and the urban heat island effect*

6.8.31 London Plan Policy 5.9 *Overheating and Cooling* provides further detail on this point, requiring development proposals to follow a cooling hierarchy (to avoid overheating and reliance on air conditioning systems) and requiring major development to demonstrate how the proposal would minimise overheating and meet its cooling needs. The importance of passive measures and insulating building materials are emphasised in Local Plan Policy DM12 and the Mayor's SPG.

6.8.32 An overheating analysis has been appended to the applicant's Energy Strategy. Its results demonstrate that both the bedrooms and living/kitchen/dining rooms within the residential units are passing the overheating requirements in accordance with current regulations. However, the GLA have noted that during more extreme weather scenarios the temperatures experienced within the flats do not demonstrate compliance. Additionally the Part L compliance worksheets provided suggest a medium risk of overheating, for some of the dwellings. The GLA have therefore requested for further passive measures to be considered in line with Policy 5.9 to avoid the risk of overheating now and in future climate.

6.8.33 The applicant has responded to this concern within the Energy Statement Addendum, and concludes that the individual strategy for each dwelling will be determined at detailed design stage. 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 and communal areas within the development should be carried out and that detailed measures to sustainably mitigate conditions within those particular flats and communal areas where overheating would occur should be required, as a condition of any planning permission.

- *Efficient use of natural resources*

6.8.34 Consideration of the proposal's measures for ensuring the efficient use of water and for the handling of construction, excavation and demolition waste is set out elsewhere in this report.

- *Minimising pollution*

6.8.35 As set out elsewhere in this report, it is considered that the proposed uses would not pose a significant threat of future land contamination.

6.8.36 Air quality and noise issues are dealt with in separate sections of this report and, subject to necessary mitigations that can be secured as conditions of any planning permission, are considered to be acceptable.

6.8.37 As a centrally located site within a District centre close to a transport hub (Harrow and Wealdstone Station) and surrounded by a road network, it is unlikely that the development would result in inappropriate levels of lighting leading to light pollution.

- *Minimising waste and maximising reuse/recycling*

6.8.38 The proposed waste and recycling arrangements 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 would contribute to the managing down the amount of waste sent to landfill and improving rates of recycling. As noted elsewhere in this report, a site waste management plan would allow for the efficient handling of construction, excavation and demolition waste from the site.

- *Avoiding impacts from natural hazards*

6.8.39 As set out elsewhere in this report, flood risk is a natural hazard that is relevant to this site. The issue is dealt with in a separate section of this report and, with mitigation, is found to be acceptable.

- *Comfort and security of future occupiers*

6.8.40 As set out elsewhere in this report, the proposal would contribute to the creation of a Lifetime Neighbourhood, including the Secured by Design principles. Controls to mitigate internal overheating are described above. It is considered that the development would offer a good level of comfort and security to future occupiers.

- *Sustainable procurement*

6.8.41 The Code for Sustainable Homes has been abolished. In these circumstances, it is not considered to be reasonable to seek to impose detailed controls over the procurement of materials for the development.

- *Biodiversity and green infrastructure*

- 6.8.42 As set out elsewhere in this report, the existing site is considered to be of very limited ecological value, so its redevelopment would not be detrimental to biodiversity. Furthermore, the proposal offers the potential to enhance biodiversity both through the provision of on-site landscaping and other features.
- 6.8.43 London Plan Policies 5.10 *Urban Greening* and 5.11 *Green Roofs and Development Site Environs* call for the provision of green infrastructure on site, including planting, green roofs and green walls. As set out elsewhere in this report, the proposal does make provision for green roof on the lower part of block A and on the eastern part of the Hub building. The details of these green roofs can be secured as part of the hard and soft landscaping details required as a condition of any planning permission.

### Decentralised and Renewable Energy

#### *Decentralised Energy*

- 6.8.44 London Plan Policy 5.6 *Decentralised Energy in Development Proposals* applies a hierarchy to the selection of appropriate energy systems for major development proposals and calls for opportunities to extend decentralised energy systems beyond the site boundary to adjacent sites to be examined. It also states that, where future network opportunities are identified, proposals should be designed to connect to these networks.
- 6.8.45 Harrow's Core Strategy includes a commitment to explore the feasibility of a district-wide decentralised energy network for the Harrow & Wealdstone opportunity area, and Policy CS2 K requires new development to make provision for future connection to the network. Local Plan Policy AAP 10 *Harrow & Wealdstone District Energy Network* reiterates the priority to be given to connecting to (or making provision for future connection to) any district-wide network, and encourages applicants to discuss the potential for the capacity of the on-site energy centre to be increased to serve both the site and adjacent sites/uses. The policy also establishes a hierarchy for system selection.

- *District-wide network*

- 6.8.46 Pursuant to the commitment contained within the Core Strategy, the Council commissioned Arup to prepare an energy masterplan for Harrow to assess the technical and financial feasibility of a district heat network within the Harrow and Wealdstone Opportunity Area. Arup found that two district heat network clusters were potentially feasible in the area. The northern cluster would provide heat to Harrow View East and West (i.e. Kodak and Zoon Leisure), the Station Road Quarter (i.e. existing Civic Centre site), Wealdstone (including the Palmerstone Road site) and Leisure Centre. Three potential locations for an energy centre have been identified for this cluster, namely Harrow View East, the Station Road Quarter, and a site adjoining the railway line, Wealdstone. The southern cluster would serve Harrow Metropolitan Centre

and Northwick Park Hospital (in Brent).

6.8.47 On the basis of the outcomes of the energy masterplan, the Council made a successful bid to the Government's Heat Network Delivery Unit (HNDU) for funding to undertake a detailed technical and financial feasibility study of both potential clusters. The tendering process is currently underway and so consultants have not yet been appointed. Early stages of the feasibility study will include direct engagement with all developers and sites coming forward in these areas to ascertain their energy demands and their feasibility to connect to a district wide CHP network. It is anticipated that the feasibility study will be concluded towards the end of 2017.

6.8.48 The applicant's Planning Statement states that the revised basement layout allows for a re-configured energy centre which allows for connection to any future district heat network.

- *Proposed site-wide decentralised energy network*

6.8.49 The proposed site-wide decentralised energy network would take the form of a combined heat and power system. The Strategy explains that in this instance it is uneconomical to export electricity to the grid.

6.8.50 The applicant's Energy Strategy considers and discounts the use wind turbines, heat pumps and solar thermal. A gas powered Combined Heat and Power (CHP) network is therefore proposed. The necessary plant would be accommodated within an energy centre located at basement level and the flues would extend through building C to roof level.

- *Potential to serve adjacent sites*

6.8.51 As the largest land component of allocated site AAP 6 and in view of the aforementioned policies of the London Plan and Local Plan policy AAP10.c, it is considered that the energy centre and associated infrastructure should be designed to enable the proposed site-wide network to be extended to serve any further development on the allocated site.

6.8.52 It is considered that a Planning Obligation should be sought requiring the proposed on-site energy centre to be laid out with sufficient space, and that an agreed route for infrastructure to the boundary with the site known as Palmerston Road / George Gange Way be safeguarded, to ensure that it would be technically feasible to extend the proposed combined heat and power network to serve the remainder of the allocated site.

- *Potential to connect to a future district-wide network*

6.8.53 There is no certainty at this point in time as to the viability, design and timetable for installation of such a future district-wide network. What can be stated with greater certainty, however, is that the operational feasibility of providing a local network is likely to be diminished if, in the meantime, the opportunity to link-up major mixed-use developments is permanently lost.

- 6.8.54 Accordingly, it is considered that a Planning Obligation should also be sought requiring that an agreed route for infrastructure be safeguarded, to ensure that it would be technically feasible to extend the proposed combined heat and power network to enable a connection to any future district-wide decentralised energy network. Furthermore, the obligation would include a commitment by the developer to make reasonable endeavours to co-operate with the Council (or its agent) to agree terms pursuant to a connection between the site-wide CHP system and a future district-wide decentralised energy network.

#### *Renewable Energy*

- 6.8.55 London Plan Policy 5.7 *Renewable Energy* requires major development proposals to achieve reductions in CO2 emissions through the use of on-site renewables, where feasible. Local Plan Policy DM14 *Renewable Energy Technology* echoes this requirement.
- 6.8.56 As noted above, part of the development's compliance with the London Plan's CO2 reduction target is predicated on the provision of PV panels. The revised roofplans show that 100 panels would be accommodated on top of each of the taller elements of blocks B and C.

#### Air Quality, Ventilation and Odour

- 6.8.57 London Plan Policy 7.14 *Improving Air Quality* provides further detail in relation to the air quality impacts of development. Specifically, it requires: minimisation of increased exposure to poor air quality; provision to address local problems of air quality; measures to reduce emissions during demolition and construction; proposals to be 'air quality neutral' and not to lead to further deterioration in air quality; ensure on-site provision of measures to reduce emissions; and assessment of the air quality implications of biomass boilers. The Mayor's SPGs (*Sustainable Design and Construction* supplementary planning guidance 2014 and *The Control of Dust and Emissions during Construction and Demolition* supplementary planning guidance 2014) provide further amplification of air quality issues in relation to this and related London Plan policies.
- 6.8.58 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).
- 6.8.59 An Air Quality assessment has been provided as part of the applicant's submission. The assessment considers the air quality implications of the proposal during the demolition and construction phase and following the completion of the development.
- *Increased exposure to poor air quality*
- 6.8.60 To consider whether the proposal would increase exposure to poor air quality (NO2 and PM10 concentrations) the assessment modelled the predicted concentrations at 28 locations comprising receptors within the proposed development (i.e. future occupiers) and existing receptors surrounding the site

(i.e. neighbouring occupiers). Receptors at ground floor level and at a height have been modelled. The assessment concludes that with the exception of the first floor of block B, the impacts of the proposal on the identified receptors would be negligible. The report proposes a ventilation system to mitigate the impacts of the proposal in relation to the first floor of block B, and concludes that with this in place, the overall impacts would be negligible. The Council's Environmental Health Officer has confirmed that there is no objection to this proposal, subject to an appropriately worded condition.

- *Provision to address local problems of air quality*

6.8.61 Although the assessment finds that the site would not be exposed to unacceptable NO<sub>2</sub> and PM<sub>10</sub> concentrations, it nevertheless remains a consideration that the whole of the Borough has been designated as an AQMA. In this regard it is relevant that the proposal, located within an area of very high public transport accessibility, provides a low level of on-site car parking. It is also notable that provision would be made for electric vehicles and for bicycle parking within the development, as required by the London Plan.

- *Measures to reduce emissions during demolition and construction*

6.8.62 To consider the air quality implications of the development during the demolition and construction phase, the assessment evaluates the potential for dust emissions during demolition, earthworks and construction to effect properties within 50 metres of the site, and for 'trackout' of dust and dirt by construction vehicles along main roads within 100 metres of the site. Noting the presence of residential properties within the immediate vicinity of the site and the wider 'trackout' area, the assessment finds that there is high sensitivity to dust emissions and notes that the risk of impacts range from high to medium. Accordingly, the assessment concludes that mitigation measures and monitoring would be required. This conclusion is confirmed by the Council's Environmental Health Officer.

6.8.63 In accordance with the Mayor's SPG, the submitted Air Quality report suggests mitigation measures in the form of an Air Quality and Dust Management Plan be put in place during construction. It states that the risk associated with the proposal would reduce from high / medium risk to low risk. The Council's Environmental Health Officer has agreed with this mitigation measure. It is therefore considered that the submission of an Air Quality and Dust Management Plan be included as part of a demolition and construction logistics and management plan prior to the commencement of development and that this be secured as a condition of any planning permission.

- *Proposals to be 'air quality neutral' and not to lead to further deterioration in air quality*

6.8.64 'Air Quality Neutral' is measured by reference to emissions benchmarks for buildings (based on various planning use classes) and for transport (based on inner and outer London zones) as described at appendices 5 & 6 of the Mayor's SPG.

- 6.8.65 Accordingly, the assessment calculates the building emissions from the residential and various non-residential components, and calculates the transport emissions with reference to trip generation rates predicted in the applicant's transport assessment.
- 6.8.66 The assessment concludes that the proposal would be 'air quality neutral' in terms of the emissions benchmarks for buildings and transport. The Council's Environmental Health Officer has not raised any objection to this conclusion.
- *Ensure on-site provision of measures to reduce emissions*
- 6.8.67 London Plan Policy 7.14 indicates that where provision needs to be made to reduce emissions from a development, it should be made on-site. The applicant's assessment has found that provision to mitigate the impacts of the demolition and construction phase of the development would be required. It is envisaged that the measures that would be included in a dust management plan could be accommodated within the application site.
- *Assessment of the air quality implications of biomass boilers*
- 6.8.68 A gas fired CHP system is proposed. The proposal would not involve the burning of solid biomass fuel. The proposed flue stack is shown on the submitted elevations and roofplan of block B. The flue would protrude 1.6m beyond the top of the parapet of the tallest block, which would accommodate PV panels.
- 6.8.69 Appendix 7 of the Mayor's SPG sets out emissions standards for gas CHP plant as well as solid biomass systems. The appendix text states that developments should only include plant that meets the standards and that further details on actual installed plant and emissions performance prior to full operation of the development should be required. Accordingly, it is considered that these details be secured, at the appropriate stages of development, as a condition of any planning permission.
- *Other air quality issues: ventilation and odour*
- 6.8.70 Details of the intended arrangements for ventilating the proposed basement including the car parking area have not been provided. However, the Council's Environmental Health Officer has advised that this can be dealt with by way of an appropriately worded planning condition.
- 6.8.71 The submitted Air Quality report highlights that there is a risk that concentrations of nitrogen dioxide in the external play area could prove unacceptable i.e. over the nitrogen dioxide hourly mean limit value. The report goes on to suggest that this could be addressed by way of an appropriately worded planning condition restricting occupation of the playspace and other amenity areas beneath the A409 for more than an hour during such pollution events. The application has been referred to the Council's Environmental Health Officer who has recommended that consideration be given to the relocation of the playspace to an area of lower pollution concentrations. The



report from the Councils Environmental Health Officer goes on to state that if relocation is not possible, an appropriately worded planning condition requiring a study to be undertaken over a winter period is required to establish the risk of unacceptable pollution levels happening at the proposed location of the playground. If the study demonstrates that the nitrogen dioxide hourly mean limit value is likely to be exceeded, then a management plan to ensure there will be no occupation of the playground or amenity areas for more than an hour during pollution events shall be submitted in writing and agreed with the Local Planning authority before the development commences.

- 6.8.72 The locational advantages of the site that make it attractive to potential future occupiers (close to Harrow and Wealdstone station and a busy road network) inherently mean that there are greater air quality impacts than the more traditional, suburban residential areas. Opportunities to improve the air quality environment or separate the new development from surrounding pollution sources are limited. However, the submitted Air Quality report shows that it is possible to mitigate the impacts, and to this end the proposal is considered to be acceptable.

#### Noise

- 6.8.73 London Plan Policy 7.15 *Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes* sets out criteria by which development proposals should manage noise. These can be summarised as avoiding adverse noise impacts on health and quality of life as a result of new development; mitigating and minimising potential adverse noise impacts upon new development; improving the acoustic environment; separating new noise sensitive development from major noise sources or, where separation is not possible, apply good acoustic design principles; and to promote new technologies/improved practices to reduce noise at source. This reflects the approach espoused at paragraph 123 of the NPPF and associated guidance. Local Plan Policy DM 1 requires a high standard of amenity taking into account, *inter alia*, noise, hours of operation, and vibration. The allocation AAP Site 6 requires noise challenges to be considered as part of any design considerations.
- 6.8.74 An assessment of the noise impacts upon the proposed development has been submitted with the planning application. The assessment confirms that noise monitoring was carried out over several days in November 2015 at four various locations. The monitoring results reveal that noise levels at this location are affected predominately by road traffic movements. This is not surprising given the location of the site at a busy roundabout and given the presence of the flyover which traverses the site. Notwithstanding this, the report states that the noise climate at the site is considered to be typical of a moderately busy urban environment, particularly as the site has comparable average and minimum noise levels as similar sized sites recently measured by RBA Acoustics (the authors of the report). These include sites at Northolt Road and the Cumberland Hotel, where planning permission was granted for mixed use developments in 2015.

- 6.8.75 The submitted noise report refers to relevant standards against which noise should be assessed. These are the “British Standard BS8233:2014, Guidance on Sound Insulation and Noise Reduction for Buildings – Code of Practice” and “World Health Organisation: Guidelines for Community Noise – 1999”. These documents suggest suitable internal noise levels within living rooms, dining rooms and bedrooms during the daytime and at night. Suitable sound levels are also outlined for outdoor living area. On the basis of these standards, and having regard to the identified noise levels at this site, the report suggests noise limits for bedrooms and living rooms within the proposed development. In order to achieve these standards, an analysis of the external building fabric has been undertaken in order to ascertain the required acoustic performance of the glazing and other external fabric elements.
- 6.8.76 Having considered the identified noise levels at the site, the proposed building layout, the type of proposed construction for the external wall and the type of mechanical ventilation, the report proposes three different types of glazing to mitigate against noise impacts. The reason for the various types of glazing is due to the differences in the prevailing noise climate around the site and the different types / uses of rooms at each floor level. The suggested location of each type of glazing is shown on two site block plans which are appended to the submitted noise report. Importantly, it is noted that the thickest glazing is proposed closest to the flyover. The report concludes that the suggested glazing requirements would ensure that suitable internal noise levels are achieved at the proposed development. It is imperative that the flats have internal noise conditions that are conducive to living activities and sleeping, and a condition requiring a more detailed assessment of the specific flats/rooms requiring mitigation, together with a detailed specification of the level of mitigation required and the methods proposed in each case, is therefore also necessary to achieve a high standard of residential amenity in this regard.
- 6.8.77 The report has failed to assess noise levels to amenity areas such as balconies and roof terraces. However, given the location of the site, it is likely that upper limit noise levels (recognised by the World Health Organisation) would be exceeded.
- 6.8.78 The locational advantages of the site that make it attractive to potential future occupiers (close to Harrow and Wealdstone station and amenities) inherently mean that it is a noisier environment to live in than more traditional, suburban residential areas. Opportunities to improve the acoustic environment or separate the new development from surrounding noise sources are limited. However, the assessment shows that it is possible to mitigate the impact of the external noise environment by the installation of glazing to an appropriate acoustic specification.
- 6.8.79 Further to this, the report also suggests plant noise emission criteria for any proposed plant at the development. These criteria are based on the results of the noise monitoring and are proposed to ensure that the amenity of adjacent neighbours is protected.

- 6.8.80 The application has been referred to the Councils Environmental Health team who note the contents of the submitted noise report. On the basis of the information that has been submitted, the Environmental Health team have suggested a number of planning conditions to address noise impacts. These suggested conditions have been incorporated into the above appraisal.

#### Contaminated Land

- 6.8.81 Paragraph 109 of the NPPF recognises that there is a role for planning in the remediation and mitigation of derelict and contaminated land. More specifically, the National Planning Practice Guidance advises that the planning system should ensure that a site is suitable for its new use and prevent unacceptable risk from pollution, and states that as a minimum land should not be capable of being determined as contaminated land under Part 2A of the Environmental Protection Act 1990. Reference is also made to the EU Water Framework Directive.
- 6.8.82 London Plan Policy 5.21 *Contaminated Land* requires appropriate measures to be taken to ensure that the redevelopment of contaminated land does not activate or spread the contamination. Local Plan Policy DM 15 *Prevention and Remediation of Contaminated Land* requires the consideration of proposals on land known or suspected to be contaminated to have regard to: the findings of a preliminary risk assessment; the compatibility of the intended use with the condition of the land; and the environmental sensitivity of the site.
- 6.8.83 The NPPF (paragraph 121) requires LPAs to ensure that the site is suitable for the new uses proposed, taking account of ground conditions including pollution arising from previous uses. Adequate site investigation information, prepared by a competent person, should be presented. A Phase 2 Intrusive Site Investigation report was submitted as part of the application documents. Following a request from the Councils Environmental Health Officer, a Phase 1 Desk Top Study was also submitted during the course of the planning application. The assessments identify a range of potential sources of contamination, and a number of potential sensitive receptors, and therefore finds that there is risk potential. The Council's Environmental Health Officer has advised that both reports are satisfactory; noting that the desktop study makes the following recommendations:
1. Further site investigations are required covering existing building footprint after demolition
  2. A discovery/watching brief strategy during groundworks for unexpected contamination
  3. A remediation statement is to be agreed with the Council
  4. A validation plan with subsequent validation report is to be agreed with the Council
- 6.8.84 Representations have been received raising concerns in relation to contamination and ground stability. The EA and the Council's Environmental Health department have reviewed the submitted information and consider it to be satisfactory, subject to a number of conditions. Subject to compliance with these conditions, it is considered that the site can be made safe for future end

users (residents, employees and the general public) and the proposal is therefore considered to be acceptable in this regard.

## **6.9 INFRASTRUCTURE**

### Electricity and Gas

- 6.9.1 London Plan Policy 5.4A *Electricity and Gas Supply* calls for developers to engage with boroughs and energy companies to identify the gas and electricity requirements of their proposals. Core Strategy Policy CS1 Z requires proposals to demonstrate that adequate existing or proposed infrastructure capacity exists or can be secured both on and off the site to serve the development.
- 6.9.2 The proposal makes provision for a sub-station at ground floor level within proposed block C. The site would be served by a gas powered Combined Heat and Power (CHP) network. The CHP network would provide a heat and power source to all of the buildings except block D, which is not feasible due to the presence of the culvert. Therefore Block D is to be serviced as a standalone block, connected directly to the utility companies for gas, water and electrical supplies.
- 6.9.3 The adequacy of the electricity and gas supply to meet existing needs and planned growth was considered, in strategic terms, as part of Harrow's Infrastructure Assessment and Delivery Plan (2011). The Plan notes that, other than a need to upgrade two electricity substations (both of which would be delivered by the relevant supplier), no further gas or electricity infrastructure requirements have been identified for the Borough. As such, it is considered that the proposed development would be adequately served by existing gas and electricity infrastructure and that it would not detrimentally affect gas and electricity distribution elsewhere in the borough.

### Water Use and Waste Water Capacity

- 6.9.4 London Plan Policy 5.15 *Water Use and Supplies* requires development to minimise the use of mains water by incorporating water saving measures and designing residential development so that mains water consumption would meet a target of 110 litres or less per head per day (including an allowance of 5 litres or less per head for external water consumption).
- 6.9.5 London Plan Policy 5.14 *Water Quality and Waste Water Infrastructure* requires development to ensure adequate waste water infrastructure capacity. Core Strategy Policy CS1 Z echoes the need for proposals to demonstrate adequate existing or proposed infrastructure capacity. Local Plan Policy AAP 9 *Flood Risk and Sustainable Drainage* requires proposals to demonstrate that they would be resistant and resilient to flooding from all sources (including sewer flooding).
- 6.9.6 In response to the consultation process, Thames Water have advised that on the basis of the information that has been submitted, they have been unable to determine the waste water infrastructure needs of this application. Thames

Water have therefore suggested that a planning condition, requiring a drainage strategy containing details of any on and off site drainage works to be submitted and agreed prior to the commencement of development, is attached to the approval of any planning permission.

### Waste and Recycling

- 6.9.7 London Plan Policy 5.3 *Sustainable Design and Construction* requires development to minimise the generation of waste and maximise reuse or recycling. These sentiments are echoed in Core Strategy Policy CS1 X. Local Plan Policy DM45 *Waste Management* requires proposals to make waste management provision on-site and to: provide satisfactory storage volume; ensure satisfactory access for collectors and collection vehicles; and be located to avoid nuisance to occupiers and adverse visual impacts. Detailed local design guidance is set out in the Council's *Code of Practice for the Storage and Collection of Refuse and Materials for Recycling in Domestic Properties* (2016).
- 6.9.8 The Code of Practice states that for flats, communal and high rise development, a two-bin system is recommended. This requires 1 x 1,100 litre waste bin and 1 x 1,280 litre recycling bin to be provided for every 8 flats. The application (as revised) proposes 47 refuse bins to serve the residential part of the proposed development. The Council's Waste Management team have advised that this provision meets the requirements of the above mentioned Code. It is noted that the plans do not identify which bins would be for recycling and which bins would be for general waste. It is considered that an appropriate ratio of each type of refuse bin can be secured by way of an appropriately worded planning condition. All of the refuse bins for the site would be stored at surface level. The main refuse store for residential bins would be within the rear part of block E, and smaller refuse stores for residential bins would be within parts of the ground floors of blocks A, B and C. Origin Housing have advised that they will be adopting a private management plan whereby an on-site manager will rotate empty/full bins from the main refuse store (accessible to site management only) to smaller refuse stores as necessary (accessible to residents). The main refuse store for commercial bins would be located adjacent to block D.
- 6.9.9 As discussed earlier in the report, refuse collection would take place from the inset bay on Masons Avenue only. The proposed inset parking bay would enable refuse collection vehicles to stop up off the highway on refuse collection days (once weekly). The submitted Planning Statement advises that on-site manager would transport all bins to an on-site collection point close to the Masons Avenue entrance on collection days.
- 6.9.10 It should be noted that, at present, the Council does not operate a collection service for organic waste from blocks of flats. This is confirmed in the Code of Practice, which advises that under-the-sink waste disposal units should be fitted to the flats to deal with food waste and that garden waste should be removed by grounds maintenance contractors for disposal. It would be for the developer to ensure that any waste from landscaping is appropriately disposed of.

- 6.9.11 The proposed arrangements would ensure that there would be limited external visual impact associated with the storage of waste and recycling material within the development. Details of any rollershutters, gates or other means of enclosing the loading bay – to ensure a satisfactory visual appearance and to mitigate the potential for noise/disturbance associated with their operation – may also be secured as a condition of any planning permission.
- 6.9.12 London Plan Policy 5.18 *Construction, Excavation and Demolition Waste* calls for major development sites to recycle construction, excavation and demolition waste on-site, wherever practicable. Core Strategy Policy CS1 X seeks to promote waste as a resource, by encouraging the re-use of materials and recycling, and requires new development to address waste management from construction.
- 6.9.13 It is considered that a full Site Waste Management Plan demonstrating compliance with these policies should be prepared and submitted to the Local Planning Authority before the commencement of development and that this may be secured as a condition of any planning permission.

#### Other Infrastructure

- 6.9.14 On 1<sup>st</sup> April 2012 the Mayor of London's Community Infrastructure Levy (CIL) came into force and applies to all development except medical and educational uses. In Harrow, the Mayor's CIL is charged at a rate of £35.00 per square metre. It used to help fund the Crossrail infrastructure project.
- 6.9.15 It is calculated that the proposal would generate a liability of £574, 217 under the Mayor's CIL. This figure is net of anticipated social housing relief.
- 6.9.16 On 1<sup>st</sup> October 2013 Harrow Council's CIL came into force. It applies to new residential development at a rate of £110.00 per square metre and to commercial development at a rate of £100.00 per square metre.
- 6.9.17 It is calculated that the proposal would generate a liability of £2,051,480 under the Harrow CIL. This figure is net of anticipated social housing relief.
- 6.9.18 London Plan Policy 8.2 *Planning Obligations* states that planning obligations should address strategic as well as local priorities and that affordable housing and public transport improvements should be given the highest importance. Core Strategy Policy CS1 AA requires all development to contribute to the delivery of strategic infrastructure identified in Harrow's Infrastructure Delivery Plan. Local Plan Policy DM 50 *Planning Obligations* undertakes to seek s.106 planning obligations to secure the provision of affordable housing and other infrastructure needed to mitigate site specific impacts of the proposed development.
- 6.9.19 Pursuant to the aforementioned policy framework the Council has published a Planning Obligations supplementary planning document (SPD). The following assessment of the proposed development's infrastructure requirements has regard to the relevant content of this SPD.

- *Affordable Housing & Wheelchair Homes*

- 6.9.20 London Plan Policy 3.12 *Negotiating Affordable Housing on Individual Private Residential and Mixed-Use Schemes* calls for the maximum reasonable amount of affordable housing to be provided in individual proposals and sets a clear expectation in favour of on-site provision. Core Strategy Policy CS1 J reiterates the requirement for the maximum reasonable amount of affordable housing to be provided on site.
- 6.9.21 The proposal makes provision for 28 affordable rent and 46 shared ownership homes. The resulting total of 74 affordable homes represents a proportion of 40 per cent of the total of 186 homes within the proposed development.
- 6.9.22 In accordance with the SPD, it is proposed that a planning obligation be used to secure the 74 affordable homes and that a review mechanism be applied to take account of any changes in viability during the course of development. In the event that viability review demonstrates that the development is financially capable of supporting an increased affordable housing offer, the expectation (in accordance with policies) is that these be provided on-site in the first instance. However, should increased on-site provision not be possible for any robust planning reason, the planning obligation should allow for a value equivalent cash in-lieu contribution to be made to enable the homes to be provided on other sites elsewhere within the Borough.
- 6.9.23 Furthermore, a planning obligation is recommended to secure the surplus shown on the independent appraisal towards off-site affordable housing.

- *Transport and Highways*

- 6.9.24 The SPD makes it clear that whilst general improvements to transport infrastructure are to be funded by the CIL and other sources, additional works required to accommodate or mitigate the impact of a proposed development should be funded by the developer.
- 6.9.25 Transport mitigation measures and off-site highway works will be required to mitigate the impacts of the proposed development. In particular:
- The provision of a raised table crossing is required at the entrance to the basement, to improve pedestrian accessibility and safety at this busy junction. These works would need to be facilitated through a section 278 agreement and this will be required by a section 106 agreement. A £1,000 contribution is required for order-making.
  - The provision of inset parking bays on Palmerston Road and Masons Avenue - The s106 will require these two bays and a car club bay to be delivered via a s278. A £2,000 contribution is required for order-making.
- 6.9.26 London Plan Policy 6.3 *Assessing Effects of Development on Transport Capacity* requires workplace and/or residential travel plans to be submitted with relevant types of application. The subject application has been accompanied by a travel plan. The plan contains a number of targets and measures, including the appointment of a travel plan co-ordinator for the site.

The Councils Travel Planner has raised some concern in relation to the contents of the Travel Plan. In accordance with the SPD, an obligation is required to ensure that a revised Travel Plan is submitted to the Council and to ensure that the developer users all reasonable endeavours to secure the effective implementation, monitoring and management of the revised travel plan for the site is considered necessary.

- 6.9.27 In addition to the site specific travel plans, Local Plan Policies AAP 19 *Transport, Parking and Access within the Heart of Harrow* and AAP 20 *Harrow & Wealdstone Green Travel Plan* require major developments to contribute to the development, funding and implementation of an area wide green travel plan for the Heart of Harrow. At the present time no work has been undertaken on this project and however it is envisaged that this project would be funded through CIL contributions.
- 6.9.28 Policy AAP 19 calls for developments in appropriate locations within town centres to exclude future occupiers of the development from eligibility for on-street parking permits and for spaces to be provided as part of major development proposals for car-club vehicles. Such measures are sought to ensure that no additional transport stress is placed on the public highway following development and to support 'car free' development in areas with high levels of public transport accessibility.
- 6.9.29 It is therefore appropriate to include an obligation that will give effect to the fact that, with the exception of disabled persons, no resident of the development shall be eligible to obtain a resident's parking permit for any controlled parking zone surrounding the application site. Furthermore, the developer shall ensure that: (i) all marketing/advertising material makes reference to this fact; 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.
- 6.9.30 The proposed car-club space would be provided off-site, on Masons Avenue. As above, the s106 will require the car club space to be delivered via a s278. An obligation requiring the developer to make provision for this space and to make reasonable endeavours to secure a car-club operator to provide a vehicle for that space is therefore sought.

- *Urban Realm Enhancements*

- 6.9.31 Policy AAP3 requires new development within Wealdstone (all 3 areas) to contribute to a programme of urban realm enhancements based around Harrow and Wealdstone Station and the promotion of better east-west pedestrian and cycle links.
- 6.9.32 It is considered that the raised table mentioned in the aforementioned section would improve pedestrian and cycle crossing in this area. Furthermore, a £10,000 contribution is sought for Legible London wayfinding signs around the site (3 finger posts and 1 monolith). It is proposed to secure this contribution through a Planning Obligation.



- *Children and Young People's Play Space*

- 6.9.33 Local Plan Policy AAP 11 *Provision of Open Space* requires major residential development to provide sufficient play space on-site to meet the needs of the development. Applying the child yields at Appendix 1 of the SPD, it is calculated that the child yield of the development would be 105.
- 6.9.34 Harrow's PPG 17 Study sets a quantitative standard of 4 square metres per child which, based in the above calculation of child yield from the development, equates to a requirement for at least 418 square metres to serve the proposed development. The floor area of the proposed onsite play area would be 260m<sup>2</sup>.
- 6.9.35 It is noted that the dedicated play space would be for 0-5 year olds. The play space need for older children would not be met on site. The proposal would therefore increase demand upon existing facilities, particularly at Byron Recreation Ground (350m to the east). In accordance with the SPD, a contribution of £15,010 towards off-site provision for 5-15 year olds is sought. It is proposed to secure this contribution through a Planning Obligation as it is a site specific infrastructure requirement and not one that should be funded out of the Harrow CIL.

- *Employment and Training*

- 6.9.36 The SPD states that all major developments will need to contribute to local employment and training. The SPD identifies three types of employment and training obligation: construction training; general employment and training; and use of local suppliers.
- 6.9.37 In accordance with the 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.
- 6.9.38 Policy 4.2 of the London Plan seeks to enhance London's varied attractions for business of different types and sizes including small and medium sized enterprises. Policy 2.7 seeks to manage and improve the stock of industrial capacity to meet both strategic and local needs, including those of small and medium sized enterprises, start-ups and businesses requiring more affordable workspace including flexible, hybrid office / industrial premises. Local Policy AAP 15 recognises that small and medium sized business and industrial uses will remain important components within the Boroughs economy, often providing activities for which there is a local need and an employment base from which other sector may provide growth. To this end, the AAP commits the Council to facilitating continued business and industrial formation and growth and to promoting a greater diversity of economic development on existing

employment land.

6.9.39 The proposed office floorspace would be delivered in the Hub building which would front Masons Avenue. The proposal shown on the revised floorplans would provide 1,165 sqm of contemporary, flexible office floorspace for individuals, small to medium sized businesses and start-up companies, which planning policy AAP 15 seeks to provide accommodation for. The submitted Design and Access Statement states that the main advantage of this business model is the flexibility that is provided to members/occupiers compared to the costly alternative of leasing business accommodation.

6.9.40 Both the GLA and the Councils Economic Development team have expressed satisfaction with this proposal. In particular, the GLA have advised that 'the proposed shift from general industry to office-led small business workspace is supported in line with London Plan policies 2.7 and 4.2. An Employment Management Plan should be secured via Section 106 to secure a flexible and accessible package of workspace terms – designed to incubate and support new items'. The Councils Economic Development team have advised that 'The submission of an Employment Management Plan is required and this shall provide detailed information relating to how the Hub building will be managed and what services will be offered to the occupants / businesses'. An obligation requiring the developer to submit an Employment Management Plan is therefore sought.

- *Decentralised Energy Networks*

6.9.41 The planning application proposes the installation of a site-wide CHP system. The implementation of the proposed site-wide CHP system can be secured through planning conditions.

6.9.42 London Plan Policy 5.6 *Decentralised Energy in Development Proposals* states that, where a new CHP system is found to be appropriate for a development, opportunities to extend the system beyond the site boundary should also be examined. The Council is committed to the delivery of a district-wide decentralised energy network within the Heart of Harrow. Local Plan Policy AAP 10 *Harrow & Wealdstone District Energy Network* requires major development proposals to within the Heart of Harrow to ensure that the design of the development would facilitate future connection to such a district-wide network and (for proposals comprising over 100 dwellings) applicants are encouraged to discuss with the Council the potential to increase the capacity of the on-site energy centre to additionally serve adjacent sites and uses. The SPD calls for the developer to carry out any on and/or off site works and, where connection to a network is required, a contribution towards the cost incurred by the Council (or its agent) of any off site works.

6.9.43 It is considered that a Planning Obligation should be sought requiring the proposed on-site energy centre to be laid out with sufficient space, and that an agreed route for infrastructure be safeguarded, to ensure that it would be technically feasible to extend the proposed combined heat and power network to serve the remainder of the allocated site and that the opportunity to connect to a wider area network is not permanently lost.

6.9.44 Energy Masterplanning work undertaken by the Council (and required by the London Plan Policy 5.5) indicates that a district heating network within Wealdstone is technically and financially feasible. Further detailed feasibility work is scheduled to commence. One potential route for the distribution network is along George Grange Way, including the elevated section that passes over the site / Masons Avenue. It is considered that a Planning Obligation should be sought requiring that any such potential route is safeguarded and requiring the developer not to unreasonably refuse such passage or impose unreasonable costs on such passage.

- *Flood Risk*

6.9.45 It has been demonstrated through the planning application submission documents that the proposal would make adequate arrangements for the management of surface water flooding and that there are no material fluvial flooding issues or known watercourses directly affecting the site or its immediate surroundings.

6.9.46 In their consultation response, the Environment Agency have advised that in this instance the applicant has modelled the flood risk on site and has provided adequate justification why traditional level for level volume for volume floodplain compensation cannot be provided. The EA have therefore recommended that the proposed voids beneath block D are maintained top ensure that they do not become blocked over time and potentially pose a flood risk. The applicant has suggested maintenance measures be delivered via a maintenance strategy to include visual inspections and clearance of debris to ensure flood flowpaths are not obstructed and has suggested that this be secured by way of a legal agreement. The EA are supportive of this proposal. An obligation requiring the developer to submit a maintenance strategy is therefore sought.

- *Biodiversity*

6.9.47 It has been demonstrated through the planning application submission documents that the proposal would not be detrimental to biodiversity. The implementation of site specific enhancement measures can be secured through planning conditions. Therefore, in accordance with the SPD, no biodiversity related obligations are required.

6.9.48 The EA notes that the applicant has not proposed to open the culverted section of the Wealdstone Brook that runs through the site, and have therefore recommended in their second response to the consultation process that a contribution be sought to fund off-site projects to provide enhancements to the river channel. These comments are noted. However, it is considered that general biodiversity improvement projects can be secured through the Harrow CIL.

- *Maintenance of the flyover*

6.9.49 The flyover on the Strategic Road Network (A409, George Grange Way) is a

critical asset that would have a significant impact on the performance of the road network if the structure failed or was weakened for any reason. It is therefore necessary to reduce the potential for increased risk of damage to the structure. It is considered that access to the structure for inspections and essential, responsive and emergency repairs is critical in order to keep the structure safe and functional. A construction and risk assessment has been undertaken by the applicant and this is included in the application documents. This has been considered by the Highways Authority who have not raised any objection to the proposal subject to the following measures being secured by legal agreement:

- The Council Engineer or its appointed contractor shall be afforded unrestricted access to undertake periodic bridge structure condition inspections.
- The Council's appointed contractor shall be afforded unrestricted access to undertake any maintenance works to the bridge structure deemed necessary by the Council's Engineer.
- Should any inspection or maintenance works require the removal of the proposed structure (The Hub), the developer must arrange for its removal within the timeframe specified by the Council Engineer. The Council will have the right to remove or partially remove the proposed structure to undertake required works should the property owner fail to cooperate.
- No part of the proposed structure shall break the surface of the bridge structure.
- No attachments shall be made to the bridge structure without the permission of the Council Engineer.

An obligation to this effect is therefore sought.

## **6.10 CONCLUSION AND REASONS FOR APPROVAL**

6.10.1 The application site is located within the Harrow & Wealdstone Opportunity Area, and is an allocated site in the Harrow and Wealdstone Area Action Plan (AAP site 6). The proposal represents a departure from the development plan, insofar as (i) the proposal is for a residential led scheme and the balance of the proposed uses is not in accordance with the AAP parameters; (ii) the proposed building height (17 storeys) would exceed the building height suggested within the AAP (6 storeys). However, it is concluded that compelling other material considerations exist to point to a decision other than in accordance with the Local Plan. In particular,

- The proposal would deliver 'landmark buildings' with high quality public realm on adjacent sites within the Heart of Harrow (an Opportunity Area and a Housing Zone). The development has been tested against the full rigour of development plan policy for tall buildings and has been found to comply. Protected views would not be adversely affected. Various experts in the design field have considered the scheme and have not raised any objection, subject to appropriately worded planning conditions. Officers are mindful of this expert advice and consider that the proposed tall buildings would be visually interesting and would represent gateway buildings to

Wealdstone. The proposed public realm would not only assist to sustain the development itself but would provide new, high quality, inclusive and legible routes in Wealdstone District Centre. This in turn would assist to increase permeability within the District Centre and strengthen the spatial definition of this part of Wealdstone, as required by the site allocation.

- The proposal would deliver high quality housing with a high percentage of affordable units (40%). The submitted Financial Viability Assessment has been robustly tested and shows that the scheme would deliver the 'maximum reasonable amount' of affordable housing, subject to the recommended obligations. It is considered that the current proposal would make a valuable contribution towards the delivery of target housing outputs including affordable housing units for the Heart of Harrow Opportunity Area, a designated Housing Zone. Furthermore, the application has demonstrated both qualitative and quantitative improvements in employment floorspace, and it is considered that the employment uses proposed on the application site would provide for a 'strong business community' within Wealdstone.
- The proposal would deliver a scheme that would greatly assist towards the regeneration of Wealdstone district centre, which is known to be currently under-performing. It is considered that the proposal will provide a high quality development and much needed physical renewal of the site. It is anticipated that the mere fact of redevelopment would improve perceptions of the district centre and confidence in the strength of the local economy. It is envisaged that the proposal will therefore assist to improve economic performance and quality of life in this locality, helping Wealdstone to achieve its full potential.

6.10.2 The concerns of residents, amenity associations and neighbouring interests are all acknowledged. The above appraisal does identify impacts of the proposed development. In particular, the proposal will bring about a significant change in outlook for neighbouring occupiers. It is considered that such impacts are inevitable if necessary growth is to be delivered within one of London's opportunity areas. It is considered on balance that subject to a comprehensive schedule of planning obligations and planning conditions, set out within the recommendation that the proposal would not detrimentally impact upon the amenity of neighbouring occupiers.

6.10.3 Subject to the planning conditions and s106 obligations, it is considered that the transport impacts of the proposal in this highly sustainable location are acceptable and in this regard, the proposal would comply with the aims and objectives of the Development Plan.

6.10.4 A range of potential environmental effects have been appraised. The application shows that the proposal would incorporate measures that would help to adapt to/manage the impacts of climate change and identify areas where mitigations are required, including those needed to secure optimal living conditions for future occupiers and to safeguard the environment of surrounding occupiers during demolition and construction phases. These mitigations would be secured through a range of recommended conditions of

planning permission. Infrastructure made necessary by the development is incorporated within the proposed heads of terms of a Planning Obligation to be entered into under section 106 of the Town and Country Planning Act. Contributions to general infrastructure requirements would be made under Harrow's Community Infrastructure Levy.

Overall, Officers consider that the proposal would make efficient use of this allocated, previously developed, highly accessible site and would replace rundown buildings with a high quality development. To this end, Officers conclude that the proposed development is worthy of support.

## 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

Unless otherwise agreed in writing by the local planning authority, the development hereby permitted shall be carried out in accordance with the approved plans and documents

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

#### 3 Dust and noise management plan

No development shall take place, including any works of demolition, until a dust and noise management plan has first been submitted to the Local Planning Authority in writing to be agreed. The plan shall detail measures for the control and reduction of dust and noise emissions associated with demolition, earthworks, construction and track out, and arrangements for monitoring air quality during construction. 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 dust emissions during demolition and construction and to safeguard the amenity of neighbouring occupiers, in accordance with Policy 7.14 of the London Plan (2016) and Policy DM1 of the Development Management Policies Local Plan (2013). To ensure that measures are agreed and in place to manage and reduce dust and noise during the demolition and construction phases of the development, this condition is a PRE-COMMENCEMENT condition.

#### 4 Demolition and construction logistics plan

No development shall take place, including any works of demolition, 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:

- 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 demolition and 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, in accordance with Policies 7.14 and 7.15 of the London Plan (2016) and Policy DM1 of the Development Management Policies Local Plan (2013) and to ensure that the transport network impact of demolition and construction work associated with the development is managed in accordance with Policy 6.3 of the London Plan (2016). To ensure that measures are agreed and in place to manage and reduce dust, noise and vibration during the demolition and construction phases of the development and manage transport impacts during the demolition and construction phases of the development, this condition is a PRE-COMMENCEMENT condition.

#### 5 Construction and site waste management plan

No development shall take place, including any works of demolition, until a construction and site waste management plan, setting out arrangements for the handling of excavation, demolition and construction waste arising from the development, and to make provision for the recovery and re-use of salvaged materials wherever possible, has first been submitted to the Local Planning Authority in writing to be agreed. The development shall be carried out in accordance with the approved plan or any amendment or variation to it as may be agreed in writing by the local planning authority.

REASON: To ensure that waste management on the site is addressed from construction stage and to promote waste as a resource, in accordance with Policy CS1 X of the Core Strategy (2012). To ensure that measures are agreed and in place to manage and re-use waste arising during the demolition and construction phases of the development, this condition is a PRE-COMMENCEMENT condition.

#### 6 Construction management strategy

No development shall take place, including any works of demolition, until a construction management strategy, to include details of cranes and other tall construction equipment (including obstacle lighting) has first been submitted to the Local Planning Authority in writing to be agreed. The construction of the development shall be carried out in accordance with the strategy so agreed.

REASON: To ensure that construction work and construction equipment associated with the development does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter and receiver systems, in accordance with Policy 7.7 of the London Plan (2016). To ensure that measures are agreed and in place to avoid any obstruction to air traffic and to safeguard the integrity of air traffic operational systems during the



demolition and construction phases of the development, this condition is a PRE-COMMENCEMENT condition.

7 Drainage

No development shall take place, other than works of demolition, until details of works for the disposal of surface water, including surface water attenuation and storage, has first been submitted to the Local Planning Authority in writing to be agreed. The submitted details shall include measures to prevent water pollution and details of SuDS and their management and maintenance. 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 achieves an appropriate greenfield run-off rate in this critical drainage area and to ensure that sustainable urban drainage measures are exploited, in accordance with Policies 5.13 and 5.15 of the London Plan (2016) and Policy AAP 9 of the Harrow and Wealdstone Area Action Plan (2013). To ensure that measures are agreed and built-in to the development to manage and reduce surface water run-off, this condition is a PRE-COMMENCEMENT condition.

8 Drainage strategy

No development shall take place, other than works of demolition, until a foul water drainage strategy, detailing any on and / or off site works that may be needed to dispose of foul water from the development and to safeguard the development from foul water flooding, has first been submitted to the Local Planning Authority in writing to be agreed. The development shall not be occupied until the agreed drainage strategy has been implemented.

REASON: To ensure that there would be adequate infrastructure in place for the disposal of foul water arising from the development, in accordance with Policy 5.14 of the London Plan (2016) and Harrow Core Strategy Policy CS1, and to ensure that the development would be resistant and resilient to foul water flooding in accordance with Policy AAP 9 of the Harrow and Wealdstone Area Action Plan (2013). To ensure that measures are agreed and put in place to dispose of foul water arising from the development, this condition is a PRE-COMMENCEMENT condition.

9 Drainage maintenance

No development shall take place, other than works of demolition, until a drainage management and sustainable drainage system maintenance plan 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 plan 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, in accordance with Policies 5.13 and 5.15 of the London

Plan (2016) and Policy AAP 9 of the Harrow and Wealdstone Area Action Plan Local Plan (2013). To ensure that such measures that are required to secure the future management and maintenance of the surface water drainage systems are agreed and built-in to the development, this condition is a PRE-COMMENCEMENT condition.

10 Site levels

No site works or development shall commence (other than demolition works) 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 in accordance with Policies AAP 1, AAP 4, AAP 9, and AAP19 of the Harrow and Wealdstone Area Action Plan (2013) and policy DM 1 of the Harrow Development Management Policies Local Plan (2013). To ensure that appropriate site levels are agreed before the superstructure commences on site, this condition is a PRE-COMMENCEMENT condition.

11 Culvert structural condition survey

The development hereby approved shall not be occupied until a Culvert Structural Condition Survey of the Wealdstone Brook (Main River) which runs in culvert through the site has first been submitted to the Local Planning Authority in writing to be agreed. The report shall demonstrate that the construction of the development has not had a detrimental impact on the condition and structural integrity of the culverted Wealdstone Brook. Should the survey show that the construction has had a detrimental impact on the structural integrity of the culvert, the applicant shall submit for written agreement by the Local Planning Authority, a remedial strategy to bring the culvert back to appropriate condition. The remedial works shall be carried out in compliance with the approved report and completed prior to occupation of the development.

REASON: To ensure that the culvert is in a safe condition for the life time of the development and to prevent an increase in flood risk on site and elsewhere, in accordance with policy DM11 of the Harrow Development Management Policies Local Plan (2013) and Policy AAP 9 of the Harrow and Wealdstone Area Action Plan (2013).

12 Piling method statement

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for works)

has first been submitted to the Local Planning Authority in writing to be agreed. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

REASON: To ensure that the culvert is in a safe condition for the life time of the development and to prevent an increase in flood risk on site and to third parties, in accordance with policy DM 11 of the Harrow Development Management Policies Local Plan (2013) and Policy AAP 9 of the Harrow and Wealdstone Area Action Plan (2013).

13 Landscape strategy

Notwithstanding the details that have been submitted, the development hereby approved shall not commence until a revised landscaping strategy, which effectively contributes to the accessibility and permeability of the site has first been submitted to the Local Planning Authority in writing to be agreed. The revised landscape strategy shall include a revised landscaping layout, details of planting, hard surfacing materials, site levels, external lighting, a space-sharing strategy, external cycle parking, public seating and details of all gradients, ramps and steps within publicly accessible areas of the development. 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 hard surfacing details shall include details of planters and samples showing the texture and colour of the materials to be used and information about their sourcing/manufacturer. The lighting details shall include detailed drawings of the proposed lighting columns and fittings, information about the levels of luminance and any measures for mitigating the effects of light pollution. The landscaping scheme shall also include details of defensible space in front of ground floor units, proposed finished site levels, boundary treatment and gates (including gates to the basement), vehicle and pedestrian access and circulation areas, minor artefacts and structures (such as play equipment, furniture, refuse storage, signs and lighting). The development shall be carried out in accordance with the approved scheme and shall be retained as such thereafter.

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 within the Heart of Harrow, in accordance with Policy 7.7 of the London Plan (2016), Policy DM1 of the Development Management Policies Local Plan 2013 and Policies AAP4 and AAP7 of the Harrow and Wealdstone Area Action Plan 2013. This condition is a PRE-COMMENCEMENT condition.

14 Cycle parking

The development hereby approved shall not progress beyond basement level until details (including allocation) of the cycle parking spaces on the site and their phased delivery alongside the development has first been submitted to the Local Planning Authority in writing to be agreed. The cycle parking shall be implemented on site for the sole use of the development in accordance with the

phasing details and shall be retained for the lifetime of the development.

REASON: To ensure the satisfactory provision of safe cycle storage facilities, to provide facilities for all the users of the site and in the interests of highway safety and sustainable transport, in accordance with policy 6.9B of The London Plan 2016 and policy AAP19 of the Harrow and Wealdstone Area Action Plan 2013. To ensure that cycle parking facilities would be available for all users of the site on immediate occupation of any of the buildings.

15 Lighting strategy

The development hereby approved shall not progress beyond basement 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 in accordance with Policy AAP 4 of the Harrow and Wealdstone Area Action Plan (2013) and to ensure that the development does not unduly impact on adjacent highways in accordance with policies DM1 and DM19 of the Harrow and Wealdstone Area Action Plan 2013.

16 Green roofs

The development hereby approved shall not progress beyond podium slab level until details of the provision of green roofs within the development has first been submitted to the Local Planning Authority in writing to be agreed. The green roofs shall be designed to contribute to the creation of appropriate habitats targeted in Table 7.3 of the London Plan 2016 and/or the Harrow Biodiversity Action Plan 2015-2020. The details to be submitted shall comprise:

- a) identification of the roof areas to be used for the provision of green roofs;
- b) details of the planting to be used; and
- c) details of the maintenance including irrigation.

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 the protection, enhancement, creation and management of biodiversity within the Heart of Harrow, in accordance with Policy DM21 of the Development Management Policies Local Plan 2013 and Policy AAP12 of the Harrow and Wealdstone Area Action Plan 2013.

17 Rooftop gardens

Notwithstanding the details shown on the approved plans, the development hereby approved shall not progress beyond podium slab level until revised

details for the approved roof terraces has first been submitted to the Local Planning Authority in writing to be agreed. The revised details shall include:

- (i) A revised layout for each of the roof terraces which contributes to privacy for neighbouring occupiers and comfort for users of the roof terraces;
- (ii) Hard and soft landscaping details;
- (iii) Details of measures to address noise levels and wind microclimate;
- (iv) Details of how inclusive access to and within communal rooftop gardens is achieved;
- (v) Details of proposed safety railings

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 achieves safe, comfortable and attractive amenity spaces, in accordance with policies DM1 and DM2 of the Councils Development Management Policies Local Plan 2013 and policy AAP4 of the Harrow and Wealdstone Area Action Plan 2013.

18 Biodiversity enhancement

The development hereby approved shall not progress beyond podium slab level until proposals for biodiversity enhancement across 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 proposals so agreed and shall be retained as such thereafter.

REASON: To ensure that the development makes appropriate provision for the protection, enhancement, creation and management of biodiversity within the Heart of Harrow, in accordance with Policy DM21 of the Development Management Policies Local Plan 2013 and Policy AAP12 of the Harrow and Wealdstone Area Action Plan Local Plan 2013.

19 Playspace

The residential premises hereby approved shall not be first occupied until a play strategy for the site has first been submitted to the Local Planning Authority in writing to be agreed. Such details shall comprise: a specification of all play equipment to be installed including provision for children with disabilities and special sensory needs; a specification of the surface treatment within the play areas; and arrangements for ensuring the safety and security of children using the play areas. 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 in accordance with Policy 3.6 of the London Plan (2016), Policy AAP11 of the Harrow and Wealdstone Area Action 2013 and policy DM28 of the Development Management Policies Local Plan 2013.

20 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 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, in accordance with Policy DM1 of the Development Management Policies Local Plan 2013 and policies, AAP4, AAP 7 and AAP 12 of the Harrow and Wealdstone Area Action Plan Local Plan (2013), and to ensure a high standard of design, layout and amenity in accordance with Policy DM1 of the Harrow and Wealdstone Area Action Plan 2013.

21 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, in accordance with Policy DM1 of the Development Management Policies Local Plan 2013 and policies, AAP 4, AAP7 and AAP 12 of the Harrow and Wealdstone Area Action Plan (2013), and to ensure a high standard of design, layout and amenity in accordance with Policy DM1 of the Harrow and Wealdstone Area Action Plan Local Plan 2013.

22 Signage

Prior to first occupation of the development, details of pedestrian, cycle and vehicle signage and wayfinding within the development shall be submitted to the Local Planning Authority in writing to be agreed.

REASON: To ensure the public realm within the development provides an inclusive, legible environment for all users in accordance with policy 7.1 of The London Plan 2016 and policy DM 2 of the Harrow Development Management Policies Local Plan (2013).

23 Public realm

The non-residential premises hereby approved shall not be first occupied until a plan for the management, maintenance and use of the public realm has first been submitted to the Local Planning Authority in writing to be agreed. The public realm shall be managed and used in accordance with the plan so agreed.

REASON: To ensure that the development is managed and maintained to create a high quality, accessible, safe and attractive public realm throughout the lifetime of the development, and to ensure that there are adequate arrangements in place for appropriate events and functions to take place within the public realm, in accordance with Policy AAP7 of the Harrow and Wealdstone Area Action Plan 2013.

24 Materials

Notwithstanding the details shown on the approved drawings, the development hereby approved shall not progress above podium slab level until:

a) details and samples of the materials to be used in the external surfaces of the buildings (facing materials for the buildings, windows/ doors/ winter gardens/ curtain walling, balconies including privacy screens and balustrades, entrance canopies), hard surfaces, and any means of enclosure;

b) drawings to a 1:20 metric scale to show typical details of the elevations from all sides and the slab thickness of roof parapets;

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 is carried out to the highest standards of architecture and materials in accordance with Policies 7.6 and 7.7 of the London Plan (2016) and Policies AAP 4 and AAP 6 of the Harrow and Wealdstone Area Action Plan 2013.

25 Materials sample panel

The development hereby approved shall not progress above podium slab level until 1:1 sample mock-ups of the external cladding system for each block 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 exact extent of the mock-ups shall be agreed with the local planning authority prior to construction. Mock-ups to include stone clad frame and window reveal, balcony fascias, opaque spandrel panels, and the junction between brick and stone cladding to blocks B and C. 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 is carried out to the highest standards of architecture and materials in accordance with Policies 7.6 and 7.7 of the London Plan (2016) and Policies AAP 4 and AAP 6 of the Harrow and Wealdstone Area Action 2013.

26 Appearance of the 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 in accordance with Policies 7.6 and 7.7 of the London Plan (2016) and Policies AAP4 and AAP6 of the Harrow and Wealdstone Area Action Plan 2013.

27 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 in accordance with Policy 7.4 of the London Plan (2016), Policy AAP 4 of the Harrow and Wealdstone Area Action Plan (2013) and DM 49 of the Development Management Policies Local Plan (2013), and to ensure that the development achieves a high standard of amenity for future occupiers the buildings in accordance with Policy DM 1 of the Development Management Policies Local Plan (2013).

28 Building appearance

Any telecommunications apparatus, extraction plant, air conditioning units and any other plant or equipment that is required on the exterior of the buildings shall be installed in accordance with details to be submitted to the Local Planning Authority in writing to be agreed. The details shall include: proposals for communal provision of television receiving equipment, wherever possible; siting; appearance; any arrangements for minimising the visual impact; and any arrangements for mitigating potential noise and vibration.

REASON: To ensure that any telecommunications apparatus and other plant or equipment that is required on the exterior of the buildings preserves the highest standards of architecture and materials in accordance with Policies 7.6 and 7.7 of the London Plan (2016) and Policies AAP 4 and AAP 6 of the Harrow and Wealdstone Area Action Plan (2013) and policy DM 49 of the Development



Management Policies Local Plan (2013), and to ensure that the development achieves a high standard of amenity for future occupiers the buildings in accordance with Policy DM 1 of the Development Management Policies Local Plan (2013).

29 Strategy for window / door openings

Notwithstanding the details shown on the approved plans, the development hereby approved shall not commence until a cohesive strategy for building entrances (including canopies), bin store doors, security gates, railings, bicycle stores, sub-station doors, basement entrance gates and treatment of the commercial units has first been submitted to the Local Planning Authority in writing to be agreed. The strategy shall include detailed drawings and material samples. 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 achieves a high standard of design and provides a high quality, safe and attractive public realm, in accordance with policies DM1 and DM2 of the Development Management Policies Local Plan 2013 and policies AAP4 and AAP7 of the Harrow and Wealdstone Area Action Plan 2013.

30 Appearance of Block E

Notwithstanding the details shown on the approved plans, the development hereby approved shall not commence until revised elevations and associated floorplans for Block E has first been submitted to the Local Planning Authority in writing to be agreed. The revised drawings shall show revised openings to the refuse storage area, and details of any perforated brickwork. 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 achieves a high standard of design and provides a high quality, safe and attractive public realm, in accordance with policies DM1 and DM2 of the Councils Development Management Policies Local Plan 2013 and policies AAP4 and AAP7 of the Harrow and Wealdstone Area Action Plan 2013.

31 Window and door reveals

Notwithstanding the details shown on the approved drawings, the construction of the buildings hereby approved shall not commence 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, in accordance with policies 7.4 and 7.7 of The London Plan 2016,

policy DM1 of The Development Management Policies Local Plan 2013 and policies AAP4 and AAP6 of the Harrow and Wealdstone Area Action Plan 2013.

32 Building maintenance

The development hereby approved shall not be occupied until a strategy for maintaining the external surfaces of the buildings has first been submitted to the Local Planning Authority in writing to be agreed. The strategy shall include details of the regime for cleaning, repainting and repairing the buildings and the logistical arrangements for implementing that regime. Maintenance of the external surfaces of the buildings shall adhere to the strategy so agreed.

REASON: To ensure that maintenance of the development is carried out to preserve the highest standards of architecture and materials in accordance with Policies 7.6 and 7.7 of the London Plan (2016) and Policies AAP 4 and AAP 6 of the Harrow and Wealdstone Area Action Plan 2013.

33 Combined heat and power plant testing

The development hereby approved shall not progress beyond damp proof course level until a specification of the combined heat and power plant, and arrangements for testing the emissions from the plant, has first been submitted to the Local Planning Authority in writing to be agreed. The aforementioned arrangements shall include a timetable for testing the plant and for reporting the test results to the local planning authority for the authority's approval in writing. The combined heat and power plant shall be installed and thereafter retained in accordance with the specification so agreed, and the testing shall be carried out in accordance with the arrangements so agreed. In the event that the local planning authority does not approve the test results, such remedial action as shall be specified in writing by the local planning authority shall be carried out no later than a date as shall be specified in writing by the local planning authority.

REASON: To ensure that the emissions from the combined heat and power system comply with the standards published at Appendix 7 of the Mayor of London's Sustainable Design & Construction supplementary planning document (2014) (or such appropriate standards as may supersede them) and that the development is consistent with the provisions of Policy 7.14 of the London Plan (2016).

34 Combined heat and power plant testing specification

The development hereby approved shall not progress above damp proof course level until a specification and drawings of the external part of the flue of the combined heat and power system 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 and shall be retained as such thereafter.

REASON: To ensure that the external part of the flue of the combined heat and power system complies with the standards published at Appendix 7 of the Mayor of London's Sustainable Design & Construction supplementary planning document (2014) (or such appropriate standards as may supersede them) in

accordance with the provisions of Policy 7.14 of the London Plan (2016), and to ensure that flue would not be detrimental to the design and appearance of the development or detrimental to the amenity of future occupiers of the development in accordance with the provisions of Policy DM 1 of the Development Management Policies Local Plan 2013.

35 Overheating

The development hereby approved shall not progress beyond podium slab level until an assessment to identify the dwellings and communal areas within the proposed development that would be at risk of internal overheating has first been submitted to the Local Planning Authority in writing to be agreed. The assessment shall include mitigation measures to prevent overheating of the dwellings and communal areas so identified. The development shall be carried out in accordance with the mitigation proposals so agreed and shall be retained as such thereafter.

REASON: To ensure a high standard of residential quality for future occupiers of the development, in accordance with policy AAP 4 of the Harrow and Wealdstone Area Action Plan and policy DM 1 of Development Management Policies Local Plan 2013, and to ensure that the development is sustainable in accordance with Policies 5.3 and 5.9 of the London Plan (2016).

36 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 (3) 'Accessible and adaptable dwellings'. The development shall be thereafter retained to those standards.

REASON : To ensure provision of 'Wheelchair and Accessible and adaptable' housing in accordance with policies 3.8 and 7.2 of The London Plan (2016), Policy AAP 4 of the Harrow and Wealdstone Area Action Plan (2013) and the Council's adopted Supplementary Planning Document: Accessible Homes (2010).

37 Storage

The residential premises hereby approved shall each be provided with a storage space in accordance with standard 4.7.1 of the Mayor of London's Housing SPG (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 in accordance with Policy 3.5 of the London Plan (2016), Policy AAP 4 of the Harrow and Wealdstone Area Action Plan 2013 and policy DM 1 of the Development Management Policies Local Plan 2013.

38 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, in accordance with policy 7.4 of The London Plan 2016 and ensure a high standard of residential quality in accordance with Policy AAP 4 of the Harrow and Wealdstone Area Action Plan (2013).

39 Contamination

No demolition shall take place until a scheme ('the first scheme') for identifying, managing and disposing of any potential contamination hazards found during demolition of the existing buildings and structures on the site has first been submitted to, and agreed in writing by, the local planning authority. No development other than demolition 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 demolition shall be carried out in accordance with the first scheme so agreed. The development other than demolition 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, in accordance with Policy 5.21 of the London Plan (2016) and Policy DM 15 of the Harrow and Wealdstone Area Action Plan 2013. 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.

40 Glare

The development hereby approved shall not progress above podium slab level until a report evaluating the risk of glare from the development and proposing any necessary mitigation has first been submitted to the Local Planning Authority in writing to be agreed. The development shall be carried out in accordance with any necessary mitigation so agreed, and shall be retained as such thereafter.

REASON: To ensure that the tall buildings on the site do not adversely affect their surroundings in terms of glare, in accordance with Policy 7.7 of the London Plan (2016).

41 Air Quality

The development hereby permitted shall not be commenced including works of demolition until details has first been submitted to the Local Planning Authority in writing to be agreed for all Non-Road Mobile Machinery (NRMM) to be used on the development site. All NRMM should meet as minimum the Stage IIIB emission criteria of Directive 97/68/EC and its subsequent amendments unless it can be demonstrated that Stage IIIB equipment is not available. An inventory of all NRMM must be registered on the NRMM register <https://nrmm.london/user-nrmm/register>. All NRMM should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment.

REASON: To ensure that the development would not result in a deterioration of air quality in accordance with policy 7.14 of The London Plan 2016, policy DM1 of the Harrow Development Management Polices Local Plan (2013) and policy AAP 4 of the Harrow and Wealdstone Area Action Plan (2013). To ensure that suitable vehicles would be used during the construction process, this is a PRE-COMMENCEMENT CONDITION.

42 Air pollution mitigation measures

The development hereby permitted shall not progress above podium slab level until details of air pollution mitigation measures for accommodation at ground, first and second floor levels of blocks A, B and C has first been submitted to the Local Planning Authority in writing to be agreed. The mitigation measures shall be in accordance with the recommendations of the *“Air Quality Assessment for Palmerston Road Deller Corner, Wealdstone dated March 2016 ref: 1993m-SEC-00001-02”*. The development shall not be occupied until the works have been completed in accordance with the approved details and thereafter retained.

REASON: To ensure that the amenity of future occupiers of the development is protected in accordance with policy 7.14 of The London Plan 2016, policy DM1 of the Harrow Development Management Polices Local Plan (2013) and policy AAP 4 of the Harrow and Wealdstone Area Action Plan (2013).

43 Play space air pollution mitigation measures

The development hereby permitted shall not commence until a nitrogen dioxide measurement study, to establish the risk of the nitrogen dioxide hourly mean limit value being exceeded in the playground, as described in the report *“Air Quality Assessment for Palmerston Road Deller Corner, Wealdstone dated March 2016 ref: 1993m-SEC-00001-02”* has first been submitted to the Local Planning Authority in writing to be agreed. In the event that the study demonstrates that the nitrogen dioxide hourly mean limit value is likely to be exceeded, then a management plan to ensure there will be no occupation for more than an hour during pollution events of the playground shall be submitted

and agreed in writing by the Local Planning authority.

REASON: To ensure that the amenity of future occupiers of the development is protected in accordance with policy 7.14 of The London Plan 2016, policy DM1 of the Harrow Development Management Policies Local Plan (2013) and policy AAP 4 of the Harrow and Wealdstone Area Action Plan (2013). This is a PRE-COMMENCEMENT CONDITION.

44 Carpark ventilation

The development hereby approved shall not progress above podium slab level until there has first been submitted to the Local Planning Authority in writing to be agreed, a scheme to ventilate the car park and minimise the ingress of polluted air, and management thereof. The development shall be carried out in accordance with the report so agreed, and shall be retained as such thereafter.

REASON: To ensure that the amenity of future occupiers of the development is protected in accordance with policy 7.14 of The London Plan 2016, policy DM1 of the Harrow Development Management Policies Local Plan (2013) and policy AAP 4 of the Harrow and Wealdstone Area Action Plan (2013).

45 Noise mitigation

The development hereby approved shall not progress above podium slab level until a report identifying those residential premises within the development that require mitigation of external noise levels and detailing the mitigation required to achieve satisfactory noise levels within those premises (and to their private balcony areas, where relevant) has first been submitted to the Local Planning Authority in writing to be agreed. The report shall also detail the arrangements for ventilating the residential premises so identified. The development shall be carried out in accordance with the report so agreed, and shall be retained as such thereafter.

REASON: To ensure that potential adverse noise impacts to residential premises within the development are mitigated in accordance with Policy 7.15 of the London Plan (2016), and to ensure a high standard of amenity for future occupiers in accordance with Policy DM 1 of the Development Management Policies Local Plan (2013).

46 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. Before any plant is used, measurements of the noise from the plant must be taken and a report / impact assessment demonstrating that the plant (as installed) meets the design requirements, shall be submitted to be approved in writing by the Local Planning

Authority.

REASON : To ensure that the development achieves a high standard of amenity for future occupiers of this and the neighbouring buildings, in accordance with Policy 7.6 of the London Plan (2016) and Policy DM 1 of the Development Management Policies Local Plan 2013.

47 Water consumption

The development hereby approved shall not progress beyond podium slab 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 110 litres per person per day, has first been submitted to the Local Planning Authority in writing to be agreed. 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 in accordance with Policy 5.13 of the London Plan (2016) and Policy DM 10 of the Development Management Policies Local Plan 2013.

48 Parking management plan

The residential premises hereby approved shall not be occupied until a Parking Management Plan has first been submitted to the Local Planning Authority in writing to be agreed. The plan shall: identify the electric vehicle charging point spaces that are to be provided within the basement car park as 'active' spaces and those as 'passive' spaces; detail the allocation of a disabled person's parking space within the basement car park to each wheelchair home within the development; detail the allocation of general parking spaces within the development; detail the management of general vehicle access across the site; detail the allocation of cycle parking for residents/staff/visitors of the development; lighting within the basement. The development shall be carried out in accordance with the plan so agreed and shall be retained as such thereafter.

REASON: To ensure that the development provides sufficient electric vehicle charging points and adequate, secure and (where appropriate) weather protected cycle parking in accordance with Policies 6.9 and 6.13 of the London Plan 2016 and Policy AAP 19 of the Harrow and Wealdstone Area Action Plan Local Plan 2013, and contributes to the achievement of a lifetime neighbourhood in accordance with Policy 7.1 of the London Plan 2016 and Policy DM 2 of the Development Management Policies Local Plan 2013.

49 Access ramp to the Basement

Notwithstanding the details shown on the approved plans, the development hereby approved shall not commence until revised details of the access ramp to the basement has first been submitted to the Local Planning Authority in writing to be agreed. The revised details shall include drawings showing the removal of the cycle lane and the provision of two-way shared access; detailed drawings showing the elevation / gradient / gating of the two-way access ramp; and measures to reduce vehicle speeds and prioritise safety on the access ramp.

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 safety of users of the access ramp, in accordance with policy 6.9 of the London Plan 2016 and policy AAP19 of the Harrow and Wealdstone Area Action Plan Local Plan 2013.

50 Non-residential Delivery and Servicing Plan

The non-residential premises hereby approved shall not be first occupied until a revised Delivery and Servicing Plan 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.

REASON: To ensure that the transport network impact of deliveries associated with non-residential uses within the development is 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 in accordance with Policy 6.3 of the London Plan (2016), Policy AAP 4 of the Harrow and Wealdstone Area Action Plan 2013 and policy DM 1 of the Development Management Policies Local Plan 2013.

51 Access to buildings

The residential premises hereby approved shall not be occupied until: (i) an audio-visual access control system has been installed for each block; or (ii) such alternative security measures have been installed that shall first have been submitted to the Local Planning Authority in writing to be agreed.

REASON: To ensure that the development achieves a high standard of residential quality for future occupiers of the development in accordance with Policy 3.5 of the London Plan (2016) and Policy AAP 4 of the Harrow and Wealdstone Area Action Plan 2013 and policy DM 1 of the Development Management Policies Local Plan 2013.

52 Access to Basement

The buildings hereby approved shall not be occupied until details of details of an access control system to the basement have been submitted to, and agreed in writing by, the local planning authority. The development shall be carried out in accordance with the approved details and shall be retained as such thereafter.

REASON: To ensure that the development achieves a high standard of residential quality for future occupiers of the development in accordance with Policy 3.5 of the London Plan (2016) and Policy AAP 4 of the Harrow and Wealdstone Area Action Plan Local Plan 2013 and policy DM 1 of the Development Management Policies Local Plan 2013.



53 Telecommunications

The development hereby approved shall not be occupied until proposals for mitigating the impact of the buildings upon broadcast (including satellite) signal reception in the area has first been submitted to the Local Planning Authority in writing to be agreed. The development shall be carried out in accordance with the mitigation proposals so agreed, and shall be retained as such thereafter.

REASON: To ensure that the tall buildings on the site do not adversely affect their surroundings in terms of telecommunications interference, in accordance with Policy 7.7 of the London Plan (2016).

54 Use Class D

The non-residential premises within blocks A, B, C and E hereby approved shall not be first occupied and used without the local planning authority's prior agreement, in writing, of the following details:

- a) notification of any proposed use within Class D1 and D2 of the Town and Country Planning (Use Classes) Order 1987, as amended;
- b) any equipment for the projection of amplified sound to customers and other members of the public inside and (where relevant) outside of the building;
- c) any externally situated plant and/or other machinery;
- d) any externally situated temporary or permanent furniture, means of enclosure and other equipment associated with the extension of commercial activity outside of the building.

The occupation and use of the ground floor, including any part thereof, shall be carried out in accordance with the notification and details so agreed until such time as a material change of use occurs that is authorised either by any statutory instrument, local development order or by the local planning authority granting of planning permission.

REASON: To ensure that the operation of the ground floor uses and any associated equipment, plant, machinery and/or outdoor activity is compatible with residential and visual amenity, in accordance with Policy AAP 18 of the Harrow and Wealdstone Area Action Plan Local Plan 2013 and policies DM 1 and DM 41 of the Development Management Policies Local Plan 2013.

55 Communications

Notwithstanding the provisions of Part 16 (Communications) to Schedule 2 of the Town and Country Planning (General Permitted Development) (England) 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 in accordance with Policies 7.6 and 7.7 of the London Plan (2016) and Policies AAP 4 and AAP 6 of the Harrow and Wealdstone Area Action Plan (2013).

56 Communications

Notwithstanding the provisions of the Electronic Communications Code Regulation 5 (2003) in accordance with The Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking or re-enacting that order with or without modification), no development which would otherwise fall within Schedule 2, Part 16, Class A of that order shall be carried out in relation to the development hereby permitted without the prior written permission of the local planning authority.

REASON: In order to prevent the proliferation of individual telecommunication items on the building which would be harmful to the character and appearance of the building and the visual amenity of the area, in accordance with Policies 7.6 and 7.7 of the London Plan (2016) and Policies AAP 4 and AAP 6 of the Harrow and Wealdstone Area Action Plan (2013).

57 Window glass

The window glass of the retail / commercial / community uses hereby approved shall not be painted or otherwise obscured without the prior written permission from the Local Planning Authority.

REASON: To ensure that active shopfronts are maintained in the interests of providing high quality, safe and attractive public realm, in accordance with policy AAP7 of the Harrow and Wealdstone Area Action Plan Local Plan 2013.

58 Pedestrian Gates

The pedestrian gates serving the development shall remain fully open between the hours of 06:30 and 22:30 hours.

REASON: To maximise opportunities to increase pedestrian permeability, in accordance with policy 7.4.B of The London Plan 2016 and ensure a high standard of residential quality in accordance with Policy AAP 4 of the Harrow and Wealdstone Area Action Plan (2013).

59 Non-residential opening hours

Unless otherwise agreed in writing by the local planning authority, the non-residential premises hereby approved shall only be open to the public between: 7:00am and 22:00pm on Mondays to Saturdays and between the hours of 10:00am and 18:00pm on Sundays and Bank Holidays, unless otherwise agreed in writing by the local planning authority.

REASON: To ensure that the operation of the ground floor uses is compatible with residential amenity, in accordance with Policy AAP 18 of the Harrow and Wealdstone Area Action Plan (2013) and policies DM 1 and DM 41 of the Development Management Policies 2013.

60 Non-residential Delivery Hours

Deliveries to any non-residential uses within the development shall take place only between the hours of 07:30 and 19:00 on Mondays to Fridays and between the hours of 08:30 and 13:00 on Saturdays.

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, in accordance with Policy 7.15 of the London Plan (2016) and Policy DM 1 of the Development Management Policies 2013.

61 Crime prevention measures

The development hereby approved shall not progress beyond podium slab level until measures to minimise the risk of crime in a visually acceptable manner and to meet the specific security needs of the development has first been submitted to the Local Planning Authority in writing to be agreed. Any such measures should follow the relevant design guides published on the Secured by Design website:

<http://www.securedbydesign.com/guides/index.aspx>. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

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, in accordance with Policies 7.3 and 7.13 of the London Plan (2016) and Policy AAP 4 of the Harrow and Wealdstone Area Action Plan 2013, and Section 17 of the Crime & Disorder Act 1998.

62 Privacy

The windows at first, second and third floor levels in the northern flank elevation of Block E shall be of purpose-made obscure glass and shall be permanently fixed closed below a height of 1.7 metres above finished floor level, and shall thereafter be retained in that form.

REASON: To safeguard the amenity of neighbouring residents, in accordance with policy DM1 of the Councils Development Management Policies Local Plan 2013.

63 Wind mitigation

The development hereby permitted shall not progress above podium slab level until details of mitigation measures to address wind microclimate impacts has first been submitted to the Local Planning Authority in writing to be agreed. The mitigation measures shall be in accordance with the recommendations of the *Pedestrian wind climate report (ref EN-CAPE 15.239 C – V1) and the addendum to this report (letter dated 23<sup>rd</sup> September)*. The development shall not be occupied until the works have been completed in accordance with the approved details and thereafter retained.

REASON: To ensure that the amenity of future occupiers of the development is protected in accordance with policy 7.7 of The London Plan (2016), policy DM1 of the Harrow Development Management Policies Local Plan (2013) and policy AAP 4 of the Harrow and Wealdstone Area Action Plan (2013).

64 Inclusive access strategy

The development hereby approved shall not progress above podium slab level until an inclusive access strategy for the site has been submitted to, and agreed in writing by, the local planning authority. The strategy shall:

- a) demonstrate inclusive access within each of the proposed non-residential units;
- b) detail the design of all gradients, ramps and steps within publicly accessible areas of the development; and
- c) detail the arrangements for disabled residents' access to, and use of, waste and recycling facilities within the development.

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 contributes to the achievement of a lifetime neighbourhood, in accordance with Policies 3.8 and 7.1 of the London Plan, Core Strategy Policy CS1 and Policy DM 2 of the Development Management Policies Local Plan 2013.

**Informatives:**

1 Policies

The decision to grant permission has been taken having regard to the policies and proposals in the London Plan and-or the Harrow Local Plan set out below, and to all relevant material considerations including any comments received in response to publicity and consultation, as outlined in the application report:

London Plan: 2.13, 2.14, 2.15, 3.1, 3.3, 3.5, 3.6, 3.8, 3.9, 3.11, 3.12, 3.16, 4.7, 4.8, 4.9, 4.12, 5.2, 5.3, 5.4A, 5.6, 5.7, 5.9, 5.10, 5.11, 5.12, 5.13, 5.14, 5.15, 5.18, 5.21, 6.3, 6.9, 6.10, 6.13, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.7, 7.8, 7.12, 7.13, 7.14, 7.15, 7.19, 7.21, 8.2.

Harrow Local Plan:

Core Strategy: CS1, CS2;

Area Action Plan: AAP 3, AAP 4, AAP5, AAP 6, AAP 7, AAP 9, AAP 10, AAP 12, AAP 13, AAP 15, AAP 18, AAP 19, AAP 20, AAP Site Allocation 6;

Development Management Policies: DM 1, DM 2, DM 3, DM 6, DM 7, DM 10, DM11, DM 12, DM 14, DM 15, DM 21, DM24, DM 28, DM 41, DM 45, DM 49, DM 50, Schedule 3.

2 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. Pre-application advice was sought and provided and the submitted application was in accordance with that advice.

3 Wheelchair Homes

The applicant is encouraged to liaise with the Council during the construction of the development to ensure, insofar as possible, that the wheelchair homes are fitted-out to meet the needs of their first occupiers.

4 Thames Water

A groundwater risk management permit from Thames Water will be required for discharging groundwater into a public sewer.

5 Thames Water

Approval should be sought from Thames Water where erection of a building or underpinning work would be over the line of, or within 3m of a public sewer.

6 Flank windows

The applicant is advised that any window in the flank elevation of the development hereby permitted will not prejudice the future outcome of any application which may be submitted in respect of the adjoining property.

7 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.

8 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: [communities@twoten.com](mailto:communities@twoten.com)

9 Resident's parking permits

The relevant traffic order will impose a restriction making residential occupiers of this building ineligible for resident's parking permits in the surrounding controlled parking zone.

10 Plans

Notwithstanding the note on your submitted plan(s), this decision has been made on the basis of measurements scaled from the plan(s), unless a dimensioned measurement overrides it.

11 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.

12 Crime prevention

In aiming to satisfy the Community Safety condition(s) the applicant should seek the advice of the Borough Crime Prevention Design Advisors (CPDA). They can be contacted through the Crime Reduction Unit, Harrow Police Station, 74 Northolt Road, Harrow, Middlesex, HA2 ODN, tel. 020 8733 3465. It is the policy of the local planning authority to consult with the Borough CPDA in the discharging of this / these condition(s).

13 Environmental Permit (Formerly Flood Defence Consent)

The applicant has been made aware that the works will may a permit under the Environmental Permitting (England and Wales) Regulations 2010 from the Environment Agency for any proposed works or structures, in, under, over or within eight metres of the top of the bank of the Wealdstone Brook culvert designated a 'main river'. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

Please do not hesitate to contact me if you have any queries.

14 Mayoral Community Infrastructure Levy

Please be advised that this application attracts a liability payment of £574,217 of Community Infrastructure Levy. This charge has been levied under Greater London Authority CIL charging schedule and s211 of the Planning Act 2008.

Harrow Council as CIL collecting authority upon the grant of planning permission will be collecting the Mayoral Community Infrastructure Levy (CIL). Your proposal is subject to a CIL Liability Notice indicating a levy of £574,217 for the application, based on the levy rate for Harrow of £35/sqm.

15 Harrow Community Infrastructure Levy

Harrow has a Community Infrastructure Levy which will apply Borough wide for certain uses of over 100sqm gross internal floor space. The CIL has been examined by the Planning Inspectorate and found to be legally compliant. It will be charged from the 1st October 2013. Any planning application determined after this date will be charged accordingly.

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 Harrow CIL Liability for this development is: £2,051,480

16 Approved Plans and Documents

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 and documents:

M701\_000.PL1.2; M701\_101.PL1.2; M701\_102.PL1.2; M701\_121.PL1.2;  
M701\_122.PL1.2; M701\_201.PL1.4; M701\_202.PL1.4.2; M701\_203.PL1.4.2;  
M701\_204.PL1.4.1; M701\_231.PL1.4; M701\_232.PL1.4.1; M701\_233.PL1.4.1;  
M701\_234.PL1.4.1; M701\_235.PL1.4; M701\_236.PL1.4; M701\_237.PL1.4.1;  
M701\_301.PL1.4.2; M701\_302.PL1.4.1; M701\_321.PL1.4.1;  
M701\_321.PL1.4.2; M701\_401.PL1.4.1; M701\_402.PL1.4; M701\_403.PL1.4;  
M701\_404.PL1.4; M701\_405.PL1.4; M701\_406.PL1.4; M701\_407.PL1.4;  
M701\_408.PL1.4; M701\_409.PL1.4; M701\_421.PL1.4.1; M701\_422.PL1.4;  
M701\_423.PL1.4; M701\_424.PL1.4; M701\_431.PL1.4.1; M701\_501.PL1.4;  
M701\_502.PL1.4; M701\_503.PL1.4; M701\_504.PL1.4; M701\_505.PL1.4;  
M701\_506.PL1.4; M701\_507.PL1.4; M701\_508.PL1.4; M701\_521.PL1.4;  
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M701\_623.PL1.4.1; M701\_624.PL1.4.1; M701\_631.PL1.4.1;  
M701\_632.PL1.4.1 M701\_631.PL1.4.1 ; M701\_721.PL1.4.1;

M701\_731.PL1.4.1; M701\_901.PL1.4.2; M701\_902.PL1.4.2;  
M701\_903.PL1.4.2; SK18.PL1.4.1; SK23.PL1.4.2; Design & Access Statement (Rev. PL1.4.2, October 2016); Planning Statement (Revision – October 2016); Economic Statement (dated October 2016); Daylight & Sunlight Report (ref. MC/SB/ROL7316 – dated March 2016); Daylight Within the Proposed Dwellings & Sunlight to Proposed Amenity Spaces Report (Ref. MC/KW/ROL7316 – dated 30 March 2016); Air Quality Assessment (Ref. 1993M-SEC-00001-02, dated March 2016); Visual Impact Assessment dated August 2016); Verified Views Methodology Report (dated March 2016-03-24), Flood Risk Assessment (dated March 2016); Flood Risk Assessment Addendum (dated May 2016); supplementary Flood Risk letters dated 27/07/2016, 22/09/2016 and 29/09/2016; Revised Transport Assessment (dated August 2016); Addendum to Transport Reports (dated 14<sup>th</sup> October 2016); External Building Fabric Assessment (Ref. 7063/EBF, dated 10 December 2015), Supplementary Acoustic letter from Andrew Heath, dated 23/09/2016; Energy Statement (ref. 15-099 Vs 01, dated March 2016); Energy Statement – Addendum (ref. 15-099 Vs 01 – Add 01, dated October 2016); Pedestrian Wind Climate Report (ref. EN-CAPE 15.239 C – V1); Supplementary Wind letter, dated 23/09/2016; Contamination Assessment Report (REF. CONT/6088a - dated June 2016); Geotechnical Interpretative Report (ref. GEO/6088 - dated 11<sup>th</sup> March 2016), Phase 1 Desk Top Study (ref. DTS/6066B – dated July 2016), Factual Report (ref. FACT 6088 – dated 30<sup>th</sup> November 2015); Letter from Muir Associates Ltd. (ref. PB/D1786-HC-001, dated 18<sup>th</sup> April 2015, Conservation Statement; Secure By Design Report (dated August 2016)





**APPENDIX 3: SITE PHOTOGRAPHS**











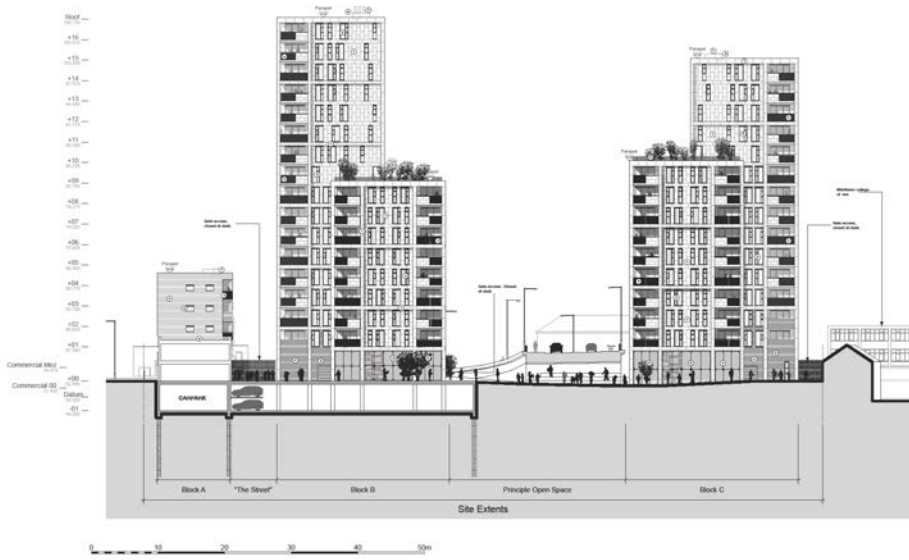
DELLER & PALMERSTON ROAD, HARROW



<p>Proposed Development Details</p> <p>Block A: 15 Storeys, 150 Units</p> <p>Block B: 15 Storeys, 150 Units</p> <p>Block C: 15 Storeys, 150 Units</p> <p>'The Street': 15 Storeys, 150 Units</p>	
<p>Site Information</p> <p>Site Area: 10,000 sqm</p> <p>Plot Ratio: 1.5</p> <p>Maximum Height: 15.5m</p>	

**Design Team**  
 Architect: Moss Architecture Ltd  
 Project: Deller & Palmerston Rd, Harrow  
 Drawing: Proposed Site Section 01  
 Date: 1.2.2016  
 Scale: 1:200  
 Project No: M01\_201\_P1\_01 Planning  
**MOSS ARCHITECTURE LTD**  
 100, The Arcade, Harrow, Middlesex, HA1 1AA  
 Tel: 0181 871 1111  
 Email: info@mosshq.com

DELLER & PALMERSTON ROAD, HARROW



<p>Proposed Development Details</p> <p>Block A: 15 Storeys, 150 Units</p> <p>Block B: 15 Storeys, 150 Units</p> <p>Block C: 15 Storeys, 150 Units</p> <p>'The Street': 15 Storeys, 150 Units</p>	
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DELLER & PALMERSTON ROAD, HARROW



**Proposed**

**Existing**

**Notes:**

1. All heights are to the top of the roof.
2. All heights are to the top of the finished floor.
3. All heights are to the top of the ground level.
4. All heights are to the top of the ground level.
5. All heights are to the top of the ground level.
6. All heights are to the top of the ground level.
7. All heights are to the top of the ground level.
8. All heights are to the top of the ground level.
9. All heights are to the top of the ground level.
10. All heights are to the top of the ground level.

**Design Team**

**Client**

**Project Name**

**Proposed Site Section 02**

**Date**

**Scale**

**Author**

**Check**

**Approved**

**MOSS**

DELLER & PALMERSTON ROAD, HARROW



**Proposed**

**Existing**

**Notes:**

1. All heights are to the top of the roof.
2. All heights are to the top of the finished floor.
3. All heights are to the top of the ground level.
4. All heights are to the top of the ground level.
5. All heights are to the top of the ground level.
6. All heights are to the top of the ground level.
7. All heights are to the top of the ground level.
8. All heights are to the top of the ground level.
9. All heights are to the top of the ground level.
10. All heights are to the top of the ground level.

**Design Team**

**Client**

**Project Name**

**Proposed Site Section 03**

**Date**

**Scale**

**Author**

**Check**

**Approved**

**MOSS**





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