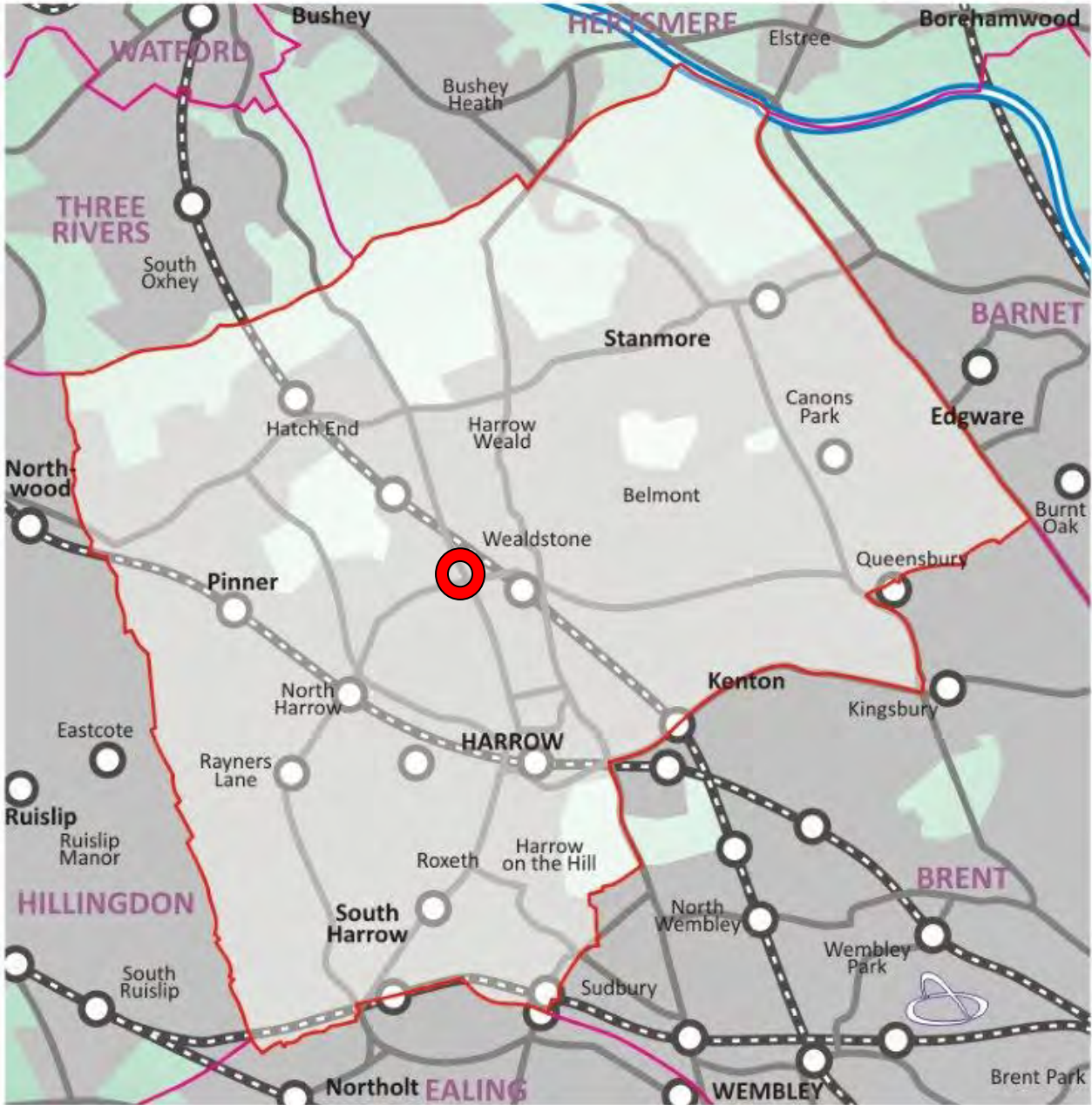
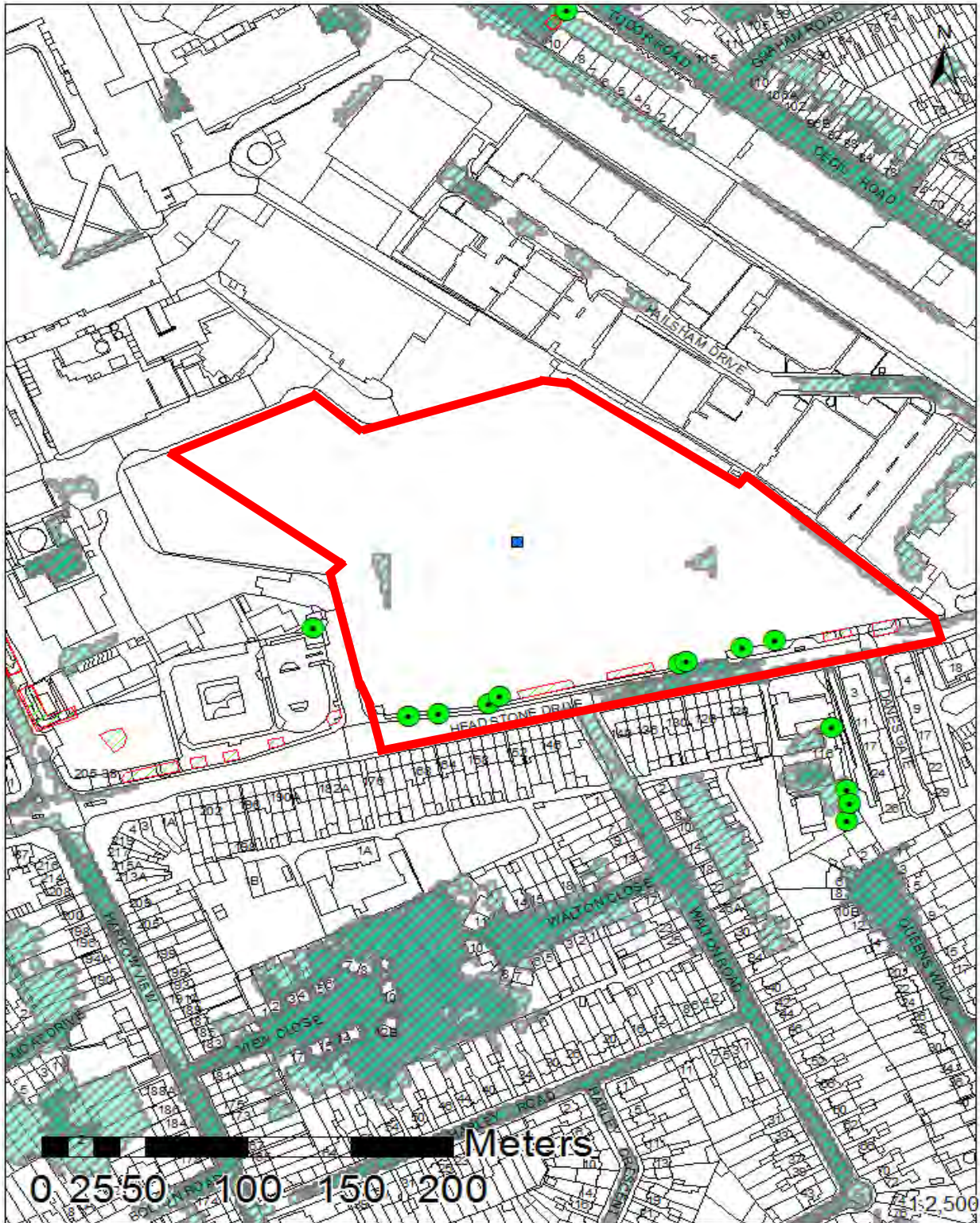


 = application site



<b>Harrow View East, (former Kodak site), Development Zone A, Headstone Drive, Harrow</b>	<b>P/4610/17</b>
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<p><b>Harrow View East, (former Kodak site), Development Zone A, Headstone Drive, Harrow</b></p>	<p><b>P/4610/17</b></p>
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# LONDON BOROUGH OF HARROW

## PLANNING COMMITTEE

14<sup>th</sup> DECEMBER 2017

**APPLICATION NUMBER:** P/4610/17  
**VALIDATE DATE:** 10/10/2017  
**LOCATION:** PHASE A, HARROW VIEW EAST (FORMER KODAK FACTORY SITE), HEADSTONE DRIVE, HARROW  
**WARD:** MARLBOROUGH  
**POSTCODE:** HA1 4TY  
**APPLICANT:** LONDON & QUADRANT HOUSING TRUST (L&Q)  
**AGENT:** CARTER JONES  
**CASE OFFICER:** SUSHILA BHANDARI  
**EXPIRY DATE:** 9<sup>TH</sup> JANUARY 2018

### PURPOSE OF REPORT/PROPOSAL

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

Approval of all reserved matters for development plots A1, A2, A3 (part A3(a) only), A4, A5, Green Link and Central Green, and approval of scale only for development plot A3(b) of Development Zone A of the Harrow View East Masterplan and details pursuant to conditions 7(Urban Design Report), 8(Energy Strategy), 9(Ecology and Biodiversity Strategy), 11(Housing Schedule), 12(Daylight and Sunlight Assessment), 13(Surface Water Drainage Strategy), 14(Accessibility Strategy), 15(Lighting Strategy), 16(Refuse Strategy), 17(Noise and Vibration Strategy), 18(Arboreal Strategy), 19(Landscaping), 20(Transport Strategy), 21(Levels), 22(Open Space Strategy) following outline planning permission granted under P/2165/15 dated 09.12.2015 for the comprehensive phased, mixed use development of land bounded by Harrow View and Headstone Drive (known as Harrow View East).

The Planning Committee is asked to:

- 1) agree the reasons for approval as set out in this report, and
- 2) grant planning permission subject to the Conditions listed and report via addendum

### REASON FOR THE RECOMMENDATIONS

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

The principle of development has been established under outline planning permission

P/2165/15 which was approved by the Planning Committee in 2015. The outline permission was granted with all matters reserved for a comprehensive mixed use redevelopment of the Kodak Factory Site. This reserved matters application solely relates to Phase A (known as Development Zone A on the approved parameter plans) of the approved masterplan which relates to the cleared parcel of land located south eastern section of the Harrow View East (HVE) site and fronts Headstone Drive.

The applicant is seeking the approval of reserved matters relating to scale, appearance, access, layout and landscaping in respect of development plots A1, A2, A3 (part (a) only), A4, A5, the green link, central green square and approval of scale only in relation to development poly A3 (b). It also seeks to discharge a number of conditions that are required at the reserved matters application stage.

The proposed redevelopment of the first phase of the masterplan by reason of its mix of different uses and community facilities would support the wider regeneration of the Wealdstone town centre. The proposals would be a catalyst to bring forward vital infrastructure contributions to support the redevelopment of the site and the wider area by way of the local CIL contributions in the region of £8million that could be used towards the borough's own infrastructure projects. In addition, there are section 106 contributions that are attached to this phase of the masterplan, which amongst other things would provide for improvements to the local highway network that is in addition to the £1million contribution for improvements to the Goodwill Junction of Headstone Drive and Harrow View already secured through the implementation of the redevelopment of Harrow View West site. Other contributions secured as part of this first phase of Harrow View East includes a contribution of £423,636 for improvements to bus services and bus stops, a contribution of £249,540 for highway improvements at the junction of Cecil Road and Ellen Webb Drive and the railway underpass, a contribution of £280,000 towards town centre initiatives and various levels of contributions towards employment and training initiatives in the region of £120,000 and economic development initiatives. As can be demonstrated, the approval of this reserved matters application would unlock vital infrastructure contributions as well as supporting the local economy in terms of jobs and training, which would otherwise not have been possible.

The proposed development is considered to be of a good design which responds positively to the character of the area due to the use of materials and scale that responds positively to its context whilst providing a unique sense of place through the detailed design. The overall landscaping masterplan is considered acceptable and in accordance with the parameters approved in the outline permission. Similarly, the layout of the development, the heights and quantum of development would also accord with the agreed parameters approved under P/2165/15.

The proposals would not give rise to any unreasonable impact upon the amenities of any neighbouring occupiers, or the wider community and will provide satisfactory living accommodation for potential occupiers.

Based on the above factors, it is considered that the external appearance, scale, layout, access and landscaping scheme submitted is acceptable and it is recommended that the application is approved.

## **INFORMATION**

This application is reported to Planning Committee as it is associated to a strategically important site within the borough.

Statutory Return Type:	Strategic Major Application
Council Interest:	Carriage way and pavement along Headstone Drive in Council's ownership.
GLA Community Infrastructure Levy (CIL) Contribution (provisional):	£2,600,431.40 based on a total floor area of 74,298.04
Local CIL requirement:	Residential = £7,258,640.40 Non-Residential = £831,040 Total = 8,089,680.40

## **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
- Nation 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 Context Plan

## OFFICER REPORT

### PART 1: Planning Application Fact Sheet

The Site	
<b>Address</b>	Zone A Harrow View East (Former Kodak Factory Site) Headstone Drive Harrow HA1 4TY
<b>Applicant</b>	London and Quadrant Housing Trust
<b>Ward</b>	Marlborough
<b>Local Plan allocation</b>	Harrow and Wealdstone Opportunity Area (London Plan designation) Heart of Harrow Housing Zone
<b>Conservation Area</b>	N/A
<b>Listed Building</b>	N/A
<b>Setting of Listed Building</b>	No
<b>Building of Local Interest</b>	No
<b>Tree Preservation Order</b>	TPO No. 875
<b>Other</b>	N/A

Housing		
<b>Density</b>	Proposed Density hr/ha	No of hab rooms:1818 Site area: 4.03 Hr/ha: 451
	Proposed Density u/ph	162
	PTAL	3-5
	London Plan Density Range	PTAL 3: 70-170 u/ha PTAL 4-5: 70-260 u/ha
<b>Dwelling Mix</b>	Studio (no. / %)	N/A
	1 bed (no. / %)	244 (37.5%)
	2 bed (no. / %)	304 (46.8%)
	3 bed (no. / %)	102 (15.7%)
	4 bed (no. / %)	N/A
	Overall % of Affordable Housing	21.5%
	Social Rent (no. / %)	84 (60% of affordable)
	Intermediate (no. / %)	56 (40% of affordable)
	Private (no. / %)	510 (78.5%)
	Commuted Sum	N/A
Comply with London Housing SPG?	Yes	
Comply with M4(2) of Building Regulations?	Yes	

<b>Non-residential Uses</b>		
<b>Existing Use(s)</b>	Existing Use / Operator	N/A
	Existing Use Class(es) sqm	N/A
<b>Proposed Use(s)</b>	Proposed Use / Operator	See below
	Proposed Use Class(es) sqm	Care Home (Use Class C2) 5,476.60m2 GEA  Health Centre (Use Class D1) 787.30m2 GEA  Foodstore (Use Class A1) 580.50m2 GEA  Flexible Active Uses (Use Classes A1-A5, B1 and D1) 832.10m2 GEA  Energy Centre (Use Class Sui Generis) 514.60m2 GEA  Note details associated with the School are reserved for future determination.
<b>Employment</b>	Existing number of jobs	N/A
	Proposed number of jobs	Not yet known

<b>Transportation</b>		
<b>Car parking</b>	No. Existing Car Parking spaces	N/A
	No. Proposed Car Parking spaces	264
	Proposed Parking Ratio	0.41
<b>Cycle Parking</b>	No. Existing Cycle Parking spaces	N/A
	No. Proposed Cycle Parking spaces	1,281
	Cycle Parking Ratio	1.97
<b>Public Transport</b>	PTAL Rating	3-5
	Closest Rail Station / Distance (m)	Harrow and Wealdstone 600m
	Bus Routes	H9 and H10
<b>Parking Controls</b>	Controlled Parking Zone?	Yes. The surrounding streets are already a CPZ and on street parking within the proposed development will be controlled via a CPZ.
	<b>CPZ Hours</b>	Mon-Fri 10-11am
	<b>Previous CPZ</b>	N/A



	<b>Consultation (if not in a CPZ)</b>	
	<b>Other on-street controls</b>	Double yellow lines on some surrounding streets. Unadopted roads within the development will be privately managed and parking restrictions enforced privately.
<b>Parking Stress</b>	<b>Area/streets of parking stress survey</b>	N/A
	<b>Dates/times of parking stress survey</b>	N/A
	<b>Summary of results of survey</b>	N/A
<b>Refuse/Recycling Collection</b>	<b>Summary of proposed refuse/recycling strategy</b>	Roads within the proposed development have been designed to accommodate Harrow refuse vehicles. Refuse vehicles should be able to stop within 10m of the majority of the entrances to refuse stores on site. Where this is not possible, refuse will be managed and moved by L&Q's management company.

<b>Sustainability / Energy</b>	
<b>BREEAM Rating</b>	<b>N/A however the proposed development will make a positive contribution towards sustainability.</b>
<b>Development complies with Part L 2013?</b>	<b>Yes – 35% improvement</b>
<b>Renewable Energy Source / %</b>	<b>PVs</b>

<b>Education (Details reserved for future determination)</b>		
<b>No. of Pupils</b>	<b>Existing</b>	
	<b>Proposed</b>	
<b>No. of Forms of Entry</b>	<b>Existing</b>	
	<b>Proposed</b>	
<b>No. of Staff</b>	<b>Existing</b>	
	<b>Proposed</b>	
<b>No. of Classrooms</b>	<b>Existing</b>	
	<b>Proposed</b>	
<b>Outdoor space (m2)</b>	<b>Existing</b>	
	<b>Proposed</b>	

## **PART 2: Assessment**

### **1.0 SITE DESCRIPTION**

- 1.1 The application site is located centrally in the Borough, has a total area of 16.65 hectares and comprises the Kodak industrial site (inclusive of operational and vacant areas) and adjacent highway land on Harrow View and Headstone Drive.
- 1.2 This reserved matters application specifically relates to the cleared land (circa 3.94 ha) located to the south, south-east of the overall factory site and known as Development Zone A for the purposes of the masterplan approved under outline permission P/2165/15.
- 1.3 The northernmost and easternmost part of the Kodak industrial site and a small section of land located on the southwest corner of the site are designated as a Strategic Industrial Location (SIL) in the Harrow and Wealdstone AAP and the Harrow Local Area Map. The area of land outside of the SIL comprises vacant/cleared site areas, as well as operational buildings of up to 57 metres in height and associated plant.
- 1.4 The site lies within the wider Harrow and Wealdstone Opportunity Area, as defined in the London Plan and in terms of area is the largest strategic site in this designation. In addition, the site falls within the Wealdstone West sub area Site 2 (Kodak and Zoom Leisure). The site allocates a minimum output of 1,230 jobs and 985 new homes to be achieved through a comprehensive mixed use led redevelopment of the site.
- 1.5 The operational land is occupied by a range of industrial, logistical and administrative office buildings. There is also a variety of associated plant and machinery on the site, including the main powerhouse chimney, which is the tallest structure on the site.
- 1.6 On the eastern edge of the site, adjacent to the railway line and to the north of the Waverley Industrial estate, is the underground bunker element of a former Air Ministry citadel building, which is locally listed.
- 1.7 The site slopes up from south to north, with maximum levels difference of approximately 6.2 metres. There is a drop in levels from the site down to Harrow View of between 1 and 1.5 metres.
- 1.8 The site benefits from two existing vehicle accesses, one from Harrow View and the principal access from Headstone Drive, adjacent to Kodak's existing Reception Building.
- 1.9 The site contains a number of protected trees, including a row of Limes adjacent to the western boundary of the site with Harrow View.

## **2.0 PROPOSAL**

- 2.1 The application relates to the submission of details in relation to scale, layout, appearance, access and landscaping which were reserved pursuant to the outline permission granted under P/2165/15 in respect of Development Zone A of the approved parameter plan.
- 2.2 This application is seeking to provide full details for development plots A1, A2, A3 (part A only), A4 and A5. Only matters relating to scale is sought for approval for development plot A3 (b) which features the proposed care home. Development plot 6 relating to the proposed primary school is not included as part of this application. This application also includes full details in respect of the proposed green link and the green square, both of which form part of the fixed parameters of the outline permission.
- 2.3 In addition to the above, this application also seeks approval of details pursuant to the following conditions, which are required to be submitted with the reserved matters application:
- Condition 7 – Urban design report
  - Condition 8 – Energy Strategy
  - Condition 9 – Ecology and biodiversity Strategy
  - Condition 11 – Housing schedule
  - Condition 12 – Daylight and sunlight assessment
  - Condition 13 – Surface water drainage strategy
  - Condition 14 – Access strategy
  - Condition 15 – Lighting strategy
  - Condition 16 – Refuse Strategy
  - Condition 17 – Noise and vibration strategy
  - Condition 18 – Arboricultural strategy
  - Condition 19 – Landscaping
  - Condition 20 – Transport strategy
  - Condition 21 – Levels
  - Condition 22 – Open space strategy
- 2.4 The proposed scheme would comprise a total of 650 new homes ranging from 1 bedroom (2 person) units to 3 bedroom (6 person) units, of which 140 units would be affordable homes. This would be split as 84 affordable rented units and 56 shared ownership (intermediate) units.
- 2.5 The proposal would also include:
- 2.5.1 Flexible active uses (uses falling in classes B1a, A1 – A5 and D1) which would be located at ground floor level in blocks A2 (fronting Headstone Drive) and A3 (in the corner fronting the green link). A total floor space of 738sqm would be provided across the two blocks.
- 2.5.2 A care home located in block A3(b) which has been allocated an indicative floor space of 5,086sqm. Only details relating to scale is under consideration in this application.

- 2.5.3 A food store located at ground floor level in block A1 with a floor area of 522sqm.
- 2.5.4 A health centre located at ground floor level in block A5 with a floor area of 733sqm.
- 2.5.5 An energy centre located within block A1 with a floor area of 481sqm.
- 2.5.6 A green link (including the green square) with a total area of 12,127sqm.
- 2.6 For information, the outline permission establishes the following parameters which are fixed for Development Zone A:
- Residential use (use class C3) – maximum 650 homes;
  - Care home (use class C2) – maximum 5,500sqm;
  - Healthcare (use class D1) – maximum 2,820sqm;
  - Foodstore (use class A1) – maximum 2,000sqm;
  - Flexible active uses (use classes A1-A5, B.1(a), D1) – minimum 500sqm up to a maximum of 2,000sqm;
  - Energy centre (sui generis) – maximum 500sqm;
  - School (use class D1) – maximum 3,630sqm; and
  - Green link – minimum 11,100sqm.
- 2.7 The individual development plots are described as follows:
- 2.7.1 Development plot A1 – this is sited along the eastern section of the site and fronts Headstone Drive (in southern direction) and the proposed new primary road (in western direction). This plot would range in height from 5 storeys to a maximum of 12 storeys in height. The proposed food store would be situated along the frontage of Headstone Drive. This block would contain a total 246 dwellings and would also contain the proposed energy centre (situated in the northern section). The proposed shared ownership units would be located within the northernmost section of this block.
- 2.7.2 Development plot A2 – this plot fronts Headstone Drive to the south, the green link to the west, the green square to the north and the primary road to the east. This plot will range in height from 5 storeys fronting Headstone Drive rising to 8 storeys facing the central green. This block would include a podium level which would provide the communal amenity space. The ground floor fronting Headstone Drive and part of the green link would contain the flexible use units. This block would contain a total of 98 dwellings.
- 2.7.3 Development plot A3 – this plot is located adjacent to the existing entrance to the factory site to the west, Headstone Drive to the south and the green link to the northwest. This plot is split into two parts. Sub plot A3 (a) situated in the northern half comprises the residential block and the site management office. A total of 30 units are proposed within a 6 storey high building with a podium deck and parking below. The southern half of this plot is known as A3 (b) comprises the care home at 5 storeys in height. This block would also have a podium level and parking below which is linked to plot A3 (a).

- 2.7.4 Development plot A4 – this plot is located between the green link to the south-west, the central green to the south-east, the primary road to the north-east and plot A5 to the north-west. This block would have a maximum height of 8 storeys fronting the central green and plot A5 with 4 storey links fronting the green link and the primary road. A double height podium deck is proposed providing the communal amenity for this block and would also facilitate parking below. In the south west corner fronting the green link a further flexible use unit is proposed which would have a floor area of 183sqm. The remainder of the block would be residential, comprising of 164 units in total.
- 2.7.5 Development plot A5 – this plot is adjacent to the northern site boundary adjoining Development Zone D of the wider masterplan. It fronts the green link to the south-west and plot A4 to the south-west. This block would have a height of 6 storeys fronting the green link rising to 8 storeys facing plot A4. A surface car park is proposed to this block. The ground floor fronting the green link would comprise the health centre with a floor area of 733sqm. The remaining block would be residential comprising of 112 units in total. The affordable rented units would be located within this block.
- 2.7.6 The green link provides the key pedestrian and cycle route through the site and would provide a linear open space with some play space. This green link will form a connection with the wider masterplan and will provide a key route through and connection between Headstone Drive, Harrow View and the western side of Harrow View and Headstone Manor.
- 2.7.7 Alongside the above, each development plot would comprise of refuse stores, secure cycle stores and service/ ancillary space to serve each relevant development plot.
- 2.8 The proposal would provide a total of 261 car parking spaces across the site which equates to an overall parking ratio of 0.4. It is proposed to allocate 211 car parking spaces for residents. A total of 47 car parking spaces will serve the commercial units, care home and health centre. Four additional spaces are proposed on the primary road consisting of two non-disabled visitor spaces and two car club spaces.

### **3.0 RELEVANT PLANNING HISTORY**

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

<b>Ref no.</b>	<b>Description</b>	<b>Status and date of decision</b>
P/3405/11	Outline planning application for a comprehensive, phased, mixed use development of land at Harrow View and Headstone Drive, as set out in the Development Specification (March 2012). The development	Granted 21/12/2012

	<p>comprises the demolition of existing buildings and structures (with the exception of the chimney and part of powerhouse) and redevelopment of the site for a mix of uses comprising business and employment uses (within Use Classes B1(a), B1(b), B1(c), B2 and B8 - up to 35,975sqm); residential dwellings (within Use Class C3 - up to 985 units); student accommodation (Sui Generis use - up to 220 units); senior living accommodation (within Use Class C2); assisted living care home (within Use Class C2) (total C2 uses up to 9,300sqm); retail and restaurant uses (within Use Classes A1, A2, A3, A4 and A5 - up to 5,000sqm); commercial leisure uses (Use Class D2); community uses (Use Class D1); health centre (Use Class D1); a primary school (Use Class D1) (total D1/D2 uses up to 8,830sqm); energy centre (Sui Generis use - up to 4,500sqm); together with new streets and other means of access and circulation; highway improvements; associated parking; re-profiling of site levels; utilities diversions and connections; open space; landscaping and ancillary development including infrastructure, works and facilities.</p>	
P/2182/15	<p>Modification to section 106 planning agreement relating to planning permission P/3405/11 dated 21 December 2012 as varied by a deed of variation dated 22 December 2014 to define and split the obligations between the East Land (Harrow View East) and West Land (Harrow View West)</p>	<p>Approved 9/12/2015</p>
P/2165/15	<p>Outline planning application (all matters reserved) for a comprehensive, phased, mixed use development of land at Harrow View and Headstone Drive (known as Harrow View East), as set out in the</p>	<p>Granted 09/12/2015</p>

	<p>Development Specification (September 2015). The development comprises the demolition of existing buildings and structures (with the exception of the chimney and part of powerhouse) and redevelopment of the site for a mix of uses comprising business and employment uses (within Use Classes B1(a), B1(b), B1(c), B2 and B8) (up to 32,360 sqm); residential dwellings (within Use Class C3) (up to 1800 units); senior living accommodation and assisted living care home (both within Use Class C2) (up to 10,230 sqm); foodstore (within Use Class A1) (up to 2,000sqm); Flexible active uses (within Use classes A1-A5, B1a and D1) (up to 2,000 sqm); leisure and community uses including commercial leisure uses (Use Class D2); Community uses (Use Class D1), health centre (Use Class D1); a primary school (Use Class D1) (total D1/D2 uses up to 9,730sqm); energy centre (Sui Generis use)( up to 600sqm) (including an interim energy centre in Phase C (up to 200sqm); together with new streets and other means of access and circulation; highway improvements; associated parking (including a multi-storey car park (Sui Generis use)(up to 8,900sqm)); re-profiling of site levels; utilities diversions and connections; open space; landscaping and ancillary development including infrastructure, works and facilities.</p>	
P/5432/16	<p>Non-material amendment to outline permission P/2165/15 dated 9/12/15 to correct inaccurate measurements annotated on the approved parameter plans and referred to in the approved Specification and Guideline Documents, and to increase the size of the proposed energy centre (Development Zone A only).</p>	<p>Approved 15/12/2016</p>

P/5898/16	Details pursuant to conditions 24 (archaeological mitigation) and 25 (programme of archaeological recording) attached to planning permission P/2165/15 dated 09/12/2015 for Outline planning application (all matters reserved) for a comprehensive, phased, mixed use development of land at Harrow View and Headstone Drive (known as Harrow View East), as set out in the Development Specification (September 2015).	Approved 15/02/2017
P/1725/17	Details pursuant to condition 26 (bat and breeding bird surveys) and part 1 & 2 of condition 27 (risk associated with contamination) attached to planning permission P/2165/15 dated 09/12/2015 for outline planning application (all matters reserved) for a comprehensive, phased, mixed use development of land at Harrow View and Headstone Drive (known as Harrow View East), as set out in the Development Specification (September 2015).	Approved 07/06/2017

#### **4.0 CONSULTATION**

4.1 4 Site Notices were erected on 17/10/2017 expiring on 7/11/2017.

4.2 Press Notice was advertised in the Harrow Times on the 19/10/2017, expiring on 9/11/2017.

4.3 The application was advertised as a major application.

4.4 A total of 4227 consultation letters were sent to neighbouring properties regarding this application.

4.5 The overall public consultation period expired on 8/11/2017

#### **4.6 Adjoining Properties**

Number of letters Sent	4227
Number of Responses Received	8



Number in Support	0
Number of Objections	7
Number of other Representations (neither objecting or supporting)	1

4.7 7 objections were received from local residents.

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

Details of Representation	Summary of Comments	Officer Comments
Ms Pesce 64 Wellington Road Harrow HA3 5SE	<p>Objects to the application due to:</p> <ul style="list-style-type: none"> <li>• Missing crucial part which is a bridge that connects the development and Harrow and Wealdstone.</li> <li>• This area is cut off from the wealthier area of Harrow on the Hill and its western part because of the railway tracks.</li> </ul>	<ul style="list-style-type: none"> <li>• An option of a bridge over the railway line was explored in the past during the very early stages of the masterplan design prior to the submission of the 2011 outline application. However such proposal was discounted by railway authorities due to number of safety factors.</li> <li>• The site is still connected by the underpass connection leading to Harrow and Wealdstone town centre.</li> </ul>
Ms Forrest 6 Holmwood Close Harrow HA2 6JX	<ul style="list-style-type: none"> <li>• Number of documents does not allow full accountability.</li> <li>• Density of building.</li> <li>• Height of building.</li> <li>• Quality of building.</li> <li>• Antisocial behaviour</li> <li>• Traffic and parking.</li> <li>• Drainage.</li> <li>• Services such as health GP.</li> <li>• Education (secondary in addition to primary).</li> </ul>	<ul style="list-style-type: none"> <li>• Given the complexity and scale of the development site, it is inevitable that there would be a high volume of documents accompanying the application. However, hard copies of the plans were also made available to view at Wealdstone Library.</li> <li>• Matters relating to density, height, quality, secure by design, traffic, parking and drainage are addressed in the appraisal section of the</li> </ul>

	<ul style="list-style-type: none"> <li>• Safety and maintenance of chimney.</li> </ul>	<p>report below.</p> <ul style="list-style-type: none"> <li>• The proposal would include an on-site health centre and a primary school.</li> <li>• Child yield data analysis undertaken at the stage of when the outline permission was granted showed that there was no additional need for secondary provision. Furthermore, the opening of Whitefriars Academy School would accommodate local secondary education need.</li> <li>• The retained chimney is not located within the subject development zone and therefore does not fall within the consideration of this application.</li> </ul>
Mr Halvey 7a Victor Road Harrow HA2 6QW	<ul style="list-style-type: none"> <li>• Too many houses being built.</li> <li>• Infrastructure will be unable to sustain further development.</li> </ul>	<ul style="list-style-type: none"> <li>• The principle of development has already been established through the approval of the outline permission and as such matters relating to density and infrastructure have already been considered under application P/2165/15.</li> </ul>
Mr Pankhania 52 Harley Road Harrow HA1 4XG	<ul style="list-style-type: none"> <li>• Parking provision is below the requirement – this will have direct impact on congestion on Harrow View and Headstones Drive.</li> </ul>	<ul style="list-style-type: none"> <li>• As noted above, the principle of redevelopment has already been established through the grant of outline permission, which was accompanied by a full transport assessment and environment statement that demonstrated that through appropriate measures/ contributions</li> </ul>

		incorporated as part of the outline permission and by legal agreement (s.106) the impacts arising could be adequately dealt with appropriate mechanisms in place.
Ms Swain 21 Pinner Park Avenue Harrow HA2 6LG	<ul style="list-style-type: none"> <li>• Horrendous high rise flats – further reduce the standard of living in Harrow.</li> <li>• Where are the gardens, cycle lanes,</li> <li>• So little car space – the roads surrounding the area will be a car park.</li> <li>• Congestion.</li> <li>• Not enough green spaces and more trees needed.</li> <li>• Overdevelopment.</li> </ul>	<ul style="list-style-type: none"> <li>• As per above principle of development has already been established and matters relating to density, traffic and parking were all addressed under the outline permission.</li> <li>• The proposal includes a generous green link and green square which would include a mix of planting and trees to enhance the overall development.</li> </ul>
HMCTS Property Directorate 102 Petty France London SW1H 9AJ (On behalf of Harrow Crown Court)	<ul style="list-style-type: none"> <li>• No objection to the principle of the proposed development, but do have concerns pertaining to the safety and security of occupiers and visiting members.</li> <li>• Noise – construction noise likely to disturb the functioning of the court – ask appropriate measures are put in place and that noisy works are undertaken outside of court operation hours. Ask that the applicant engage with HMCTS to</li> </ul>	<ul style="list-style-type: none"> <li>• Points noted and appropriate safeguarding measures are already in place with regard to noise, transport and parking and these are discussed further under the appraisal section of this report. Matter relating to overlooking and privacy are also addressed below.</li> </ul>

	<p>discuss the construction programme.</p> <ul style="list-style-type: none"> <li>• Transport and highways – construction and operation traffic could have adverse impact on the operation of the court. It is requested that a detailed construction traffic management plan, construction logistics plan and delivering and servicing management plan is secured by condition and prepared in coordination with HMCTS.</li> <li>• Privacy and overlooking – proposed height of Block A1 gives some cause for concern – overlooking of the court and adverse impacts on privacy of the court room. Ask that the issue of overlooking and loss of privacy are taken into account during the consideration of the design – windows and balconies facing the court to be screened.</li> </ul>	
<p>Mrs Harshna P 18 Pinner Park Avenue North Harrow</p>	<ul style="list-style-type: none"> <li>• Impact of Harrow View East and West have not been considered in</li> </ul>	<ul style="list-style-type: none"> <li>• Noted. As stated above the principle of development has already been established through</li> </ul>

HA2 6LF	<p>conjunction with each other.</p> <ul style="list-style-type: none"> <li>• Increase congestion around area – leading to more pollution and poorer quality of life.</li> <li>• Council not considered the impact of high density housing in a small area.</li> <li>• Lead to anti-social behaviour and fly-tipping.</li> <li>• Would like to see high density of bins across the site.</li> <li>• High density flats out of character with the area which mostly comprises of family houses not flats.</li> <li>• The planned green areas are nowhere near enough to replace the loss of two playing fields.</li> <li>• Impact on infrastructure will be significant – bus routes, additional trains, medical services or educational services. Where are the additional transport options to ease congestion.</li> <li>• No consideration towards encouraging local business or trade in this plan.</li> </ul>	<p>the grant of the outline permission. At the time of considering the outline permission a fully comprehensive Environmental Statement (ES) accompanied the application to address some of the objections being raised here. The ES was found to be sound and suggested appropriate mitigations to deal with the environmental impacts of this development. His included the limiting of number of cars on the development site through appropriate constraints in place. The ES had full regard to the surrounding developments in the area so enable a comprehensive assessment of the wider area not just the site.</p> <ul style="list-style-type: none"> <li>• The outline permission has secured a number of contributions which will enable improvements to the local road network and bus services.</li> <li>• The wider masterplan includes a school, health centre, community and care home to provide a mixed and balanced community. The development also includes flexible commercial floor space which would encourage the growth of small and independent traders.</li> </ul>
Mr Paresh Seth 1 Barons Mead	<ul style="list-style-type: none"> <li>• Harrow has too many flats.</li> <li>• Traffic in area.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted. Matters addressed in the appraisal below.</li> </ul>

	<ul style="list-style-type: none"> <li>• Train station will not be able to cope.</li> <li>• Pollution from increased number of cars.</li> </ul>	
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4.9 Statutory and Non Statutory Consultation

4.10 The following consultations have been undertaken:

LBH Environmental Health
LBH Highways
LBH Planning Policy
LBH Design
LBH Conservation Officer
LBH Tree Officer
LBH Education
LBH Regeneration
LBH Landscape Architects
LBH Lighting Section
LBH Waste Officer
TFL
EDF Energy (Network PLC)
Historic England - GLASS
Environment Agency
Designing Out Crime Officer, Metropolitan Police Service
National Grid Transco
Thames Water Authority
London Fire And Emergency Planning Authority

4.11 External Consultation

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

<b>Consultee</b>	<b>Summary of Comments</b>	<b>Officer Comments</b>
Environment Agency	No objections or comments to make.	Noted. Details pursuant to condition 13 (surface water drainage strategy) will be considered by the Council's Drainage Authority.
Design Out Crime Office	<ul style="list-style-type: none"> <li>• Risk of crime within both the public and non-public areas of the proposed development, and the interactions between</li> </ul>	Noted and appropriate condition recommended.

	<p>the two should be considered at the outset and preventative measures made.</p> <ul style="list-style-type: none"> <li>• Crime map shows that the area is experiencing a high volume of anti-social behaviour, burglary, violent crime and motor vehicle crime.</li> <li>• With continued consultation with a DOCO and the use of correct tested, accredited and third party certified products this development would be able to achieve Secured by Design award.</li> <li>• Therefore recommend that a planning condition is attached requiring this development to achieve Secured by Design accreditation.</li> </ul>	
London Underground	No comment to make on the planning application.	Noted.
Thames Water	<ul style="list-style-type: none"> <li>• Cannot agree to the discharge of condition 13.</li> <li>• Require the points of connection to the public sewer system, both foul and surface water as well as the anticipated floor into any proposed connection point.</li> </ul> <p><u>22.11.2017</u></p> <ul style="list-style-type: none"> <li>• Confirmation that condition 13 can be discharged.</li> </ul>	<p>Noted. The applicant has provided an email from Graeme Kasselmann of North London Infrastructure Planning Manager Wastewater Strategy, Planning and Assurance,</p> <p>Who has confirmed that they have reviewed the proposals for surface and foul water as well as assessed their sewer model in the area to determine available capacity. They have confirmed that they are confident that neither foul</p>

		nor surface water flows would yield a detriment to the existing sewer system.
Natural England	No comment to make on the discharge of conditions.	Noted.
Transport for London	<ul style="list-style-type: none"> <li>• In respect of the requirement of condition 20 the report submitted cannot be considered detailed.</li> <li>• Lack of detail on parking management – how are spaces allocated/ sold/ leased/ etc. how are disabled spaces to be allocated.</li> <li>• Not clear how cycle parking would be fully accessible as drawings show stacking racks.</li> <li>• Not clear which spaces would be active or passive provision for electric vehicle charging.</li> <li>• No information in relation to pick-up and drop-off points for the primary school.</li> <li>• No comparison of the pedestrian and cycle routes through the site with the side wide approach.</li> <li>• Vehicle, cycle and pedestrian signage is deferred to the detailed stage.</li> <li>• Parking enforcement is not detailed.</li> <li>• No comparison of this strategy to the Transport</li> </ul>	Noted. At the time of writing this report, the applicant's transport consultant has been asked to review the comments received. Further information will be reported back by addendum.



	<p>Assessment.</p> <ul style="list-style-type: none"> <li>• A travel plan was required but does not seem to be provided,</li> <li>• Delivery &amp; servicing plan and construction logistics plan not supplied.</li> <li>• In summary finds that the information supplied fails to fulfil the requirements of condition 20.</li> </ul>	
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## 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].

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

## 6.0 **ASSESSMENT**

6.1 The main issues are;

Principle of the Development  
 Regeneration  
 Character and Appearance of the Area  
 Residential Amenity  
 Traffic, Parking, Access, Servicing and Sustainable Transport  
 Development and Flood Risk  
 Trees and Ecology

Accessibility  
Sustainability  
Housing Mix

## 6.2 Principle of Development

- 6.2.1 The principle of redevelopment of the Kodak factory site has been long established through the approval of two outline permissions under refs: P/3405/11 and P/2165/15 for the comprehensive phased mixed re-development of the former factory site. Further to the outline permission granted under P/2165/15, the applicant sought a non-material minor amendment application (s.96a application) under ref: P/5432/16 to correct inaccurate measurements annotated on the approved parameter plans and referred to in the approved Specification and Guideline Documents, and to increase the size of the proposed energy centre (Development Zone A only). This application followed a detailed survey of the site which established that the onsite measurements did not correlate with the approved parameter plans. The application also increased the size of the proposed energy centre in order to better accommodate the necessary green technologies on the site. This application was approved at the end of 2016. For the purposes of this reserved matters application, the details before the local planning authority are based on the revised parameter plans, the addendum to the Design Guidelines (DG) and the addendum to the Development Specification (DS) approved under the s.96a application, alongside the original plans and documents approved under the substantive outline application.
- 6.2.2 The subject site is located within the “Heart of Harrow” which encompasses the two town centres of Harrow and Wealdstone, the Station Road corridor linking the two centres, and the industrial land and open spaces surrounding Wealdstone, including the Kodak site, Headstone Manor and the Harrow Leisure Centre.
- 6.2.3 The Heart of Harrow is now designated as an Opportunity Area in the 2016 version of the London Plan and the outline permission granted under P/2165/15 was approved on the basis of this designation. The Opportunity Area designation is expected to contribute to the delivery of 3,000 jobs and a minimum of 2,800 new homes within the Area. Through higher density residential and mixed use development on key strategic.
- 6.2.4 In addition to being an Opportunity Area, the entire Heart of Harrow is also designated as a Housing Zone, which seeks to help unlock the potential to deliver more than 5,000 new homes over the plan period. Housing Zones are designed to work flexibly depending on the local circumstances, however all new developments would need to be built to high quality standards and in compliance with all relevant policies contained within the development plan. In particular, proposals will need to demonstrate how new homes will come forward in a master planned approach, delivering strong communities through urban design and achieving a coherent neighbourhood.
- 6.2.5 The Kodak factory site is identified as a development opportunity site in the AAP and falls within the Wealdstone West sub area Site 2. The site allocates a

minimum output of 1,230 jobs and 985 new homes to be achieved through a comprehensive mixed use led redevelopment of the site.

- 6.2.6 The approved masterplan plan divides the site into four different development zones (phases), which are further split into development plots. Whilst the masterplan was granted outline permission with all matters reserved, there are certain parameters that are fixed under this outline permission, which includes the amount of open space to be provided, the heights of the buildings, access point and primarily route through the site. The parameter plans also fixes the floor spaces for different uses to be provided within each development phase and the number of residential units.
- 6.2.7 This application relates to the first phase (Development Zone A) of the Harrow View East masterplan approved under application P/2165/15 and forms the southern cleared part of the Harrow View East site, adjacent to Headstone Drive and the Waverley Industrial Estate. As noted under the planning history section, the outline permission grants permission to deliver up to 1,800 new homes on this site, new employment floor space of up to 32,360sqm, a new 3 form entry primary school, up to 10,230sqm of senior living/ assisted care accommodation, a food store (up to 2,000sqm), flexible commercial floor space (up to 2,000sqm), commercial leisure, community floor space, health centre, energy centre, associated new streets, highway improvements, multi-storey car park, open space and associated landscaping.
- 6.2.8 Development Zone A, as proposed under this application, will deliver 650 new homes, all of the commercial floor space including the food store, healthcare floor space, a care home and a school, alongside circa half the overall green link approved under the outline permission. The green link is strategically important, forming a new route from Wealdstone town centre through the Harrow View West site to Headstone Manor. Development Zone A of the approved masterplan would form the gateway to the wider masterplan site and accordingly this phase comprises the densest part of the masterplan with the tallest element (at 12 storeys) of the master plan located along the eastern edge of plot A1.
- 6.2.9 It is however, noted that the proposed school will not be delivered as part of this reserved matters application. The operators of the school will be delivering this as a standalone reserved matters application in the future. It is also further noted that only matters relating to scale is sought for the proposed care home. This is primarily due to there being no end operator at this time for the care home and as such it is not clear what the requirement of the end operator would be at this stage to deal with matters relating to appearance, landscaping, access and layout.
- 6.2.10 The outline permission granted under P/2165/15 has robustly tested the provision of a food store and flexible retail/ commercial floorspace in an out of town location and the assessment undertaken as part of the outline permission was found to be sound. As already established in principle, the function of these commercial units would serve as a place making function that would be integral to the success of a high density development. Furthermore, the improvement in

the public realm between the Wealdstone Town Centre and the site would most likely have a positive impact upon the vitality and viability of the town centre and the local facilities provided on site. The floorspace being proposed for the food store and the flexible commercial uses would be within the parameters approved under the outline permission and the location of the units would be in accordance with the approved Development Specification, which sought to keep commercial uses along the frontage of Headstone Drive and the Green Link in order to active these frontages. In this regard, the quantum and location of these uses would be acceptable and would help deliver the visions of the wider masterplan.

- 6.2.11 Development Zone would also include health care floor space and a care home, the principle of which has also been established. The quantum of floor space proposed would be in accordance with the approved parameters and would ensure the delivery of mixed and balanced communities.
- 6.2.12 As stated above the applicant is seeking approval of all reserved matters in relation to development plots A1, A2, A3 (a), A4 and A5 and only matters relating to scale for development plot A3 (b) (Care home). Each of these matters is appraised in detail below and Officers consider that, subject to the imposition of appropriate conditions where necessary, the details before the local planning authority should be approved. In addition to the reserved matters, the applicant is also required to submit details for a number of conditions attached to the original outline permission. As discussed in detail below, Officers are of the opinion that the details submitted pursuant these conditions are acceptable and where in cases further details are still required, appropriate conditions have been recommended. Officers consider that such an approach would not prejudice the local planning authority in seeking to ensure that the detailed development meets the aspirations set out in the masterplan.

### 6.3 Regeneration

- 6.3.1 The proposal would relate to the redevelopment of an allocated site within the AAP. Consolidation of the industrial and employment uses on this site and the subsequent release of Strategical Industrial Land (SIL) for redevelopment would bring about the regeneration of this area through the comprehensive mixed use redevelopment of the site.

It is inevitable that the character of the area will significantly change through the intensive urbanisation of the area as a result of the high density of development. However, the increase in density in this location is vital to support the wider regeneration of Wealdstone Town Centre and its surrounding area through sustained economic growth and job creation.

As noted above the approval of this reserved matters application would not only in itself regenerate the immediate area, but would release essential contributions to enable the Council to improve the surrounding public realm and the connectivity between the site and Wealdstone Town Centre, all of which are considered integral to ensure the successful regeneration of the local area.

The proposal would be in accordance with the Council's Regeneration policies and objectives.

## 6.4 Character and Appearance of the Area

### ***Policy Context***

- 6.4.1 The London Plan (2016) policies 7.4B and 7.6B set out the design principles that all boroughs should seek to ensure for all development proposals. The London Plan policy 7.4B states, *inter alia*, that all development proposals should have regard to the local context, contribute to a positive relationship between the urban landscape and natural features, be human in scale, make a positive contribution and should be informed by the historic environment. The London Plan policy 7.6B states, *inter alia*, that all development proposals should; be of the highest architectural quality, which complement the local architectural character and be of an appropriate proportion, composition, scale and orientation. Development should not be harmful to amenities, should incorporate best practice for climate change, provide high quality indoor and outdoor spaces, be adaptable to different activities and land uses and meet the principles of inclusive design.
- 6.4.2 Core Policy CS1.B specifies that 'All development shall respond positively to the local and historic context in terms of design, siting, density and spacing, reinforce the positive attributes of local distinctiveness whilst promoting innovative design and/or enhancing areas of poor design; extensions should respect their host building.'
- 6.4.3 Policies AAP3 and AAP4 of the Harrow and Wealdstone Area Action Plan 2013 seeks to ensure that all development proposals achieve a high standard design and layout. Development within all three sub areas of Wealdstone as set out in the AAP will be required to *inter alia* strengthen the district centre and improve the environment and identity of the Wealdstone area as a location for business and industrial activity and for family living. Criterion E of policy AAP3 sets out the design parameters that should be taken into consideration when assessing development proposals within Wealdstone West sub area, which *inter alia* includes the plan's vision to improve the link between the west sub area of Wealdstone and the district centre, design which creates a sense of place that is related to and an extension of Wealdstone and make provision for community uses that are not appropriate to locate in the district centre.
- 6.4.4 The detailed design considerations for the Kodak site (including the Zoom Leisure site) are set out under the Site 2 allocation under Chapter 5 of the AAP. This sets out a comprehensive list of design considerations.
- 6.4.5 The applicant has also submitted an Urban Design Report (UDR) pursuant to Condition 7 which requires the following:

*Applications for approval of Reserved Matters for each relevant phase submitted pursuant to this permission relating to layout, scale, appearance and landscaping shall be accompanied by an urban design report which explains the*

*approach to the design and how it addresses the relevant Design Guidelines for that phase. This document should also include measures to minimise the risk of crime in a visually acceptable manner and meet the specific security needs of that phase of development.*

- 6.4.6 The UDR sets out how the proposed development would realise the visions set out in the approved Design Guidelines for that Phase.

***Pre-application discussions and Design Review Panel***

- 6.4.7 This scheme has been extensively developed through detailed pre-application discussions held with Officers, the Design Project Officer and external design consultants.
- 6.4.8 The scheme has been presented to two different design review panels and has also had a chair review of the scheme. Through each stage of the review proposal the applicant has sought to develop the scheme further in response to comments raised.
- 6.4.9 The first panel review of the initial proposals was considered back in January 2017. The panel generally felt that the proposals had great potential, but that they lacked identity and that this could be carried forward by developing more muscular and robust architecture confidently within the site. The panel also considered that the edge of the central green was poorly defined diluting the strength of the green link and that the buildings facing the green link should be better defined. Comments were also made in respect of the vehicular access and parking strategy being unclear.
- 6.4.10 The applicant sought to address concerns raised by the first panel by developing the massing further by creating robust architecture that reflected the historic Kodak plant and mediating this massing with the dwellings on Headstone Drive with a series of Mansion blocks along the frontage. A pergola has been incorporated at the southern edge of central green which would create a level difference between the central green and the green link, thereby giving identity to each of these spaces. The character of the green link has been developed to be reflective of the industrial character. Other changes incorporated included differentiating between the primary road and Tertiary Street, increasing the number of dual aspect units by reducing the width of the taller elements of Block A1 and creating a consistent five storey base to the building along the primary road.
- 6.4.11 The revised proposals were presented to a different design review panel (comprising of a new chair and members) in June 2017. The panel raised concerns over the identity of the blocks along the western edge of the green link and their relationship with the green link. Concerns were also raised on the amount of inactive frontage along the primary road and lack of residential accommodation at ground floor level; the massing of the junction of block A2 between the green link and Headstone Drive needs refining; the relationship of the tall blocks on the primary road and impact on daylighting; details and material need careful consideration to avoid blocks appearing austere and

monotonous; not all blocks having access to amenity space and consideration of how the different typologies work.

- 6.4.12 The scheme was further developed to take on board the issues raised above, which included *inter alia* a change to the architectural character of the blocks on the western side of the green link to better connect with the green link; provision of maisonettes in the ground floor of block A1 to activate this frontage and the provision of roof terraces to block A1 to provide a communal private amenity area. The scheme also included amendments to some of the internal layouts of the blocks and review of the details, materials and architectural language of the blocks.
- 6.4.13 The scheme was presented to the chair of the DRP in August 2017 for a final review, prior to the submission of this reserved matters application. The chair considered that some improvements had been made, however did recommend that further work is required. Recommendations included further articulation to the gables of the blocks; reduction in the level of inactive frontage to block A3 fronting the green link; an approach to linking up with the subsequent phases of the masterplan, in particular with block A5, a further podium garden at the corner junction of block A1, level of inactive frontage on both side of the primary road should be reduced by 50% variations in the colour of the brick, the depth of reveals, the fenestrations and entrance tiles should be utilised to increase variation across the proposals.
- 6.4.14 In response to the final review, the proposals have been further developed and the scheme now under consideration has sought, where feasible, to take on board the recommendations made in the final design review. For the avoidance of duplication, the response to the final design review has been incorporated within the appraisal below. As demonstrated in the assessment below, the proposed development has progressed significantly since its initial presentation to Officers and the proposal under consideration now sets to deliver the visions of the approved masterplan within the approved parameters and design guidelines. It is acknowledged that the applicant has been open to the number of recommendations made through the review process. However, it is inevitable with the scale of development being proposed and with the constraints of the masterplan that certain recommendations could not be incorporated within the final proposal. Notwithstanding this, Officers consider (as appraised below) that the current proposals would achieve a high standard of development on the site and would support the wider regeneration of Wealdstone centre.

## **Appraisal**

### Scale

- 6.4.15 The original outline permission fixes the maximum heights within each development zone. The height of the buildings proposed and densities are within the parameters of the approved masterplan. As noted above the massing form has been developed through pre-application meetings, workshops, design review panels and having due regard to the approved Design Guidelines and approved parameters plans. In order to develop the scale of buildings, an

assessment of the character and an analysis of the architectural language of the area were undertaken and the applicant has set this out in their UDR. The approved Design Guidelines document set out the three proposed character areas for the Harrow View East masterplan. Development Zone A, was entirely within Zone 1 character area – Wealdstone Character. However, through pre-application discussions and scheme development, Zone 2 character – Industrial Character has been extended into Development Zone A to incorporate the industrial references. This reflects the historic arrangement on the Kodak plant site. The southern edge would still retain reference to the Wealdstone character.

- 6.4.16 Development Zone A is the first phase of the Harrow View East masterplan providing the gateway to the wider development and initial connection to the existing community.
- 6.4.17 The scale of buildings proposed would be more akin to the former industrial scale. The heights of the buildings are appropriately positioned to ensure that the taller elements are within the inner and eastern most sections of the development site whereas the outer edges retain modest height buildings to respect the scale and height of neighbouring buildings. The buildings along the Headstone Road frontage would derive their character from the mansion block typology, reflecting the local vernacular.
- 6.4.18 The tallest three buildings (10 and 12 storeys) would be located along the new primary road (development plot A1) and would be flanked by the Waverly Industrial Estate to the east. The massing of these three blocks would be broken down with shorter 5 storey linked blocks to ensure that the massing and scale are kept human in scale.
- 6.4.19 The height of the buildings along Headstone Drive (southern parts of plots A1, A2 and A3) would be no higher than 5 storeys. This is to ensure that the frontage and entrance points into the development site are kept to a scale which positively responds to the established scale of development in the immediate area.
- 6.4.20 Buildings along the eastern edge of the green link and along the green square would be no higher than 8 storeys. Block A2 would be 8 storey in height fronting block the green link and square. Block A4 would have two blocks at 8 storeys in height perpendicular to the green link with 4 storey link blocks fronting the green link and primary road. The massing between Block A2 and A4 would seek to create and enclose a high quality public amenity space in the central green. The edges would consist of long medium height buildings to create a strong edge to this space.
- 6.4.21 Block A5 would have an 8 storey block perpendicular to the green link and primary road and a 6 storey linked block fronting the green link. Along the western edge of the green link Block A3 (a) would be buildings would be 6 storeys in height with a single storey podium linking to the 5 storey block fronting Headstone Drive.



- 6.4.22 As noted, above the scale of the buildings are positioned to respond to the typology of the streets and spaces that they front and would be within the set parameters of the outline permission. The review of the pre-application proposal by the DRP did raise some concerns over the tall blocks on both sides of the primary road. However, the DRP acknowledge that the heights were agreed in the approved masterplan. Officers consider that the refinement in scale of the three taller blocks though the reduction in width and provision of smaller linked elements would help to break down the perception of mass.
- 6.4.23 The density of the development is determined by the approved masterplan. The outline permission acknowledged that the density output for this site far exceeds those set out in the AAP for this allocated site. However, the re-designation of the Heart of Harrow as an Opportunity Area in the London Plan and the designation of the Heart of Harrow as a Housing Zone, has provided the support to unlock opportunities to exploit higher density developments on strategically positioned sites such as the former Kodak Factory site.
- 6.4.24 Acknowledging that the height and the density of proposed development will change the character of this site and the surrounding area, Officers consider that this site provides a strategic opportunity for the site to create its own character and essentially form a catalyst to enhance the character and nature of this part of the Opportunity Area, which welcomes more dense forms of developments through increased scale. Officers consider that the proposal would help realise the aspirations set out in the Core Strategy and the AAP for this key strategic site, as well as meeting the aims of the Mayor's Housing Zone. On this basis, the overall scale and density of the proposed development would be acceptable within the context of the surrounding area.

#### Layout

- 6.4.25 The layout and composition of the blocks, amenity space, streets and open space are shown to be within the fixed parameters of the masterplan and the approved development specification accompanying the outline application. The development plots are broadly fixed with some degree of deviation permitted and as such the positioning of the buildings is depicted by these fixed parameters. As noted under the history section above, the parameters approved under P/2165/15 were amended through a section 96a (non-material minor amendment) application, as a result of a detailed site survey undertaken of the site, which showed that the original site measurement were incorrect. Accordingly, the layout subject of this application follows on from the revised parameters plans and addendum to the Design Guidelines and Development Specification.
- 6.4.26 Along the Headstone Drive frontage, flexible commercial space, food store and extra car facilities would activate this frontage and would provide additional amenity on route to Wealdstone town centre. These active frontages would turn the corners into the green link and primary road to better address these spaces and aid to activate the entrance points into the wider site. To further activate the frontage along the green link a commercial flexible space is located within the

corner of Block A4 fronting the green link and central square and a health centre is proposed further north in the ground floor of Block 5.

- 6.4.27 It is acknowledged that during the course of pre-application discussions the restrictiveness of the approved parameters has meant there has been some compromise over the layout and the positioning of buildings along key strategic routes within the masterplan. In earlier pre-application iterations, the edge to the green link was not strongly defined and buildings were situated at right angles to the green link. However, orientating the buildings to form an edge to the green link posed problems with the layout of the built form overlooking the central green. Having acknowledged the restrictiveness of the masterplan, the current proposal seeks to address this conflict in layout, by making the building ends more defined along the edge of the green link and by increasing the height of the linked block to further strengthen the edge along the green link. Officers are happy with the layout of the gable ended linear blocks as this offers the best solution within the confines of the masterplan.
- 6.4.28 In response to the comments raised in the final design review, the applicant has amended the western edge of the green link to increase the level of active frontage along this edge. This has been achieved by turning the ground floor corner of the proposed extra care facility to better address the green link. The ground floor layout of Block A3-A has been amended so that the management office is positioned before the entrance lobby to the apartment block. The cycle stores have been divided to provide further openings into the building fabric.
- 6.4.29 In terms of the primary road, the footprint of the foodstore located within Block A1 and the commercial flexible floorspace located within the ground floor of Block A2 have been extended further to help activate the entrance into this road. The communal entrance to Core A2-3(Block A2) is sited on the corner of the central green and primary road. The central arm of Block A1 would include five maisonettes and core entrances to this block would be double height and of generous size, to further enhance the pedestrian experience by activating these frontages. The layout now proposed along the primary road has been developed in response to various comments raised through design review. To further enhance the ground floor layout the some of the cycle stores would include glazing.
- 6.4.30 Officers acknowledge that the inclusions of various servicing/ utility floorspace such as for refuse and cycle storage that is necessary to support the functioning of the overall development would mean that certain parts of the ground floor would create blank and inactive edges. However the necessity of such floorspace i.e. being located in a convenient and accessible location has to be balanced against creating active frontages. As such, it is inevitable that the layout of such services would create some inactive frontages. However, the applicant has, as noted above, sought to minimise this where it is feasible, such as the inclusion of glazing panels to the cycle stores to provide a sense of activation.

- 6.4.31 The layout of the Tertiary Roads (adjacent to Block A4 and central green and between Blocks A4 and A5) would incorporate maisonettes with their own entrances to activate these frontages.
- 6.4.32 Upper levels of Blocks A2, A3 and A4 have been designed around semi-private courtyard podiums and the layouts of the units at this level have been designed where feasible to overlook both private amenity and onto public realm, car parks and streets. The layout of Block A1 would include roof top terraces. Block A5, due to its awkward relationship with the northern site boundary would not be able to facilitate a communal private amenity area. This was something that was raised at the last design review. The current proposals show that the area behind the building would provide parking for the health centre and the residents of this block. At present due to the layout of the building on this plot, there would be no opportunity to provide a meaningful external amenity area. However, the applicant is in discussions with the adjoining land owner to look at possible options to perhaps include a small courtyard amenity area when the proposals of the neighbouring phase come forward. Having regard to the site constraints noted above and given that the site offers some form private amenity space in the form of balconies; it is considered that the proposal would be acceptable in this regard.
- 6.4.33 The layout of the primary and secondary route would be in accordance with the approved parameter plans. Where possible the layout has sought to meet the specific design guidelines approved in the original permission. The parameter plans fixes the primary access point and secondary route into the site which has a 5m deviation limit at either side. It also fixes the shared surface off the primary road with a 3m deviation built in at either side. The proposed layout of the primary road and shared surface routes would broadly follow the approved parameter. The layout shows that the amount of green link and central green would be in accordance with the approved parameters. The shared access routes which would accommodate, vehicular, pedestrian and cycle traffic is also shown in an acceptable manor and in accordance with the relevant design guidelines.
- 6.4.34 The maisonettes located along the eastern side of the primary road would have a defensible zone ranging from 3.2m (the first three maisonettes) and 1.45m (the northern most two maisonettes). The Design Guidelines recommends for this street type to maintain a defensible area of at least 2.5m from the adjacent pavement area. Whilst three of the five maisonettes located along this street would achieve this minimum, two would fall short by 1m. From the overall scheme, these are the only two units that would fall short of the minimum defensible areas recommended in the Design Guidelines. However, harm would be offset by the landscaped verge that would span most of the length of the front gardens to these units. Officers consider that the proposal would on balance, be considered acceptable.
- 6.4.35 In terms Block A2, the ground floor maisonettes would have a defensible zone of at least 6.2m, which would exceed that recommended in the guidelines. With regard to Blocks A4 and A5 all the ground floor maisonettes would either meet or exceed the minimum defensible zone recommended in the guidelines.

- 6.4.36 Officers consider that the resultant layout would still maintain the key principle of providing a defensible zone between the residential elements and the public realm to safeguard the future occupiers of the development and therefore support the layout being proposed.
- 6.4.37 The layout of the different blocks in relationship to the different street typologies, the green link and the central green would ensure that the minimum distances are maintained as per the approved parameters plans. Overall it is considered that the layout of the development would be consistent with the approved parameter plans.

#### Access

- 6.4.38 Primary vehicle access to the development would be located on Headstone Drive within Development Zone A and would continue through Development Zones D and C of the wider masterplan and connect to the existing four arm roundabout on Harrow View. As Development Zone A would be the first phase to be delivered, the access point on Headstone Drive would form the primary access to and exit from the development site. A secondary road is maintained adjacent to Block A3 which would provide access to Block A3 under the current proposals, but would serve the school and the future phases of the wider masterplan. The other secondary and shared surface routes would be used by residents. The shared surfaces across the site would serve pedestrians, cyclists and motorcars, with preference given to the former two users. The green link would provide the main link from Headstone Drive to Harrow View for both cyclists and pedestrians. In order to guide such users to this route appropriate wayfinding signage would be incorporated into the transport strategy to encourage active use of this green link.
- 6.4.39 Overall the access to and from the site would be broadly in line with the versions set out in the design guidelines. Accessibility to buildings and open space is dealt with under the relevant section of the appraisal.

#### Appearance

- 6.4.40 As noted above, the approved Design Guidelines Documents sets out three proposed character areas for the Harrow View East Masterplan. Zone 1 is reflective of Wealdstone Character; Zone 2 takes influence from Kodak works and Zone 3 is reflective of Headstone Manor and Harrow Museum character. Development Zone A is entirely within Zone 1. However, through pre-application discussions, it was considered that in order to better reflect the historic use of the site, Character Zone 2 is extended into this phase and Character Zone 2 is reduced to a strip along Headstone Drive.
- 6.4.41 The Headstone Drive frontage is influenced by local examples of mansion blocks, which is translated into an elevation grounded by a single storey of defined retail frontage with residential above. The ground floor would be light in colour with a large expanse of glazing defining the non-residential uses, which would help to create a base for the building. The residential entrances to the

apartments above would be defined by glazed doors and canopies with coloured soffits. The buildings themselves would have a deliberate horizontal emphasis portrayed through repeating fenestration patterns and a series of linked bays at street level. White composite detailing would be utilised to emphasise the openings with long narrow curved edge balconies and smaller openings. It is intended to construct the upper floors in a buff or similar brick colour. Along with the white composite detailing, the fenestration would be composed of a dark grey slim metal frame. The balconies would have a white composite to the base and dark grey railings.

- 6.4.42 Buildings along the eastern edge of the green link would consist of repeating gable ends that are of the same mass and style and would take influence from the industrial aesthetic. Brick piers would be exaggerated to provide an architectural language distinctive to the residential scheme and taking some influence from the former Kodak buildings. Balconies would protrude into the open space directed to overlook the green link. The subservient linked buildings that infill the area in between the prominent ends would provide an enclosure to the green link and define the edge. These linked elements would be set back and of lower height. Whilst the prominent gable ends would be constructed in brick the linked elements would be constructed in metal cladding to further emphasise the hierarchy of the buildings. At ground floor level where there is commercial/ non-residential floor space being proposed these would be defined by large openings, which would distinguish it from the ground floor maisonettes that also form part of the active frontage. The gable ends would be articulated by the use of staked soldier header to openings at upper levels and a hit and miss brick detail at first floor level just above the entrances to the apartment blocks. The residential entrances would be defined by green glazed bricks and a green canopy soffit. The balconies would be formed from dark grey railing and would be contemporary in appearance. The fenestration would be in dark grey and comprise slim metal framing. A red brick type would be used in the construction of the gable ends. The metal cladding is proposed to be bronze in colour.
- 6.4.43 The western edge of the green link is proposed to be as more of a green boundary where landscape planting interacts with the buildings. The podium wall fronting the green link would have varied brick work which would serve as dual purpose for ventilation for the car park as well as providing opportunity for plants to climb. The different levels in the wall would also provide for planting and seating. Block A3 would have a similar hit and miss brick work to match the opposite site of the green link. A brown type of brick is proposed for this block. The proposed fenestration would be dark brown in colour with slim metal framework and openings would have soldier heading above. The main entrance to the apartment block would be defined by green glazed brick. Metal railings are proposed for the balconies which would be green in colour.
- 6.4.44 The two linear blocks (A4 and A2) that front on to the central green would be similar in appearance to the gable ends fronting the green link and would consist of the same material palette. The ground/ first floor maisonettes would have hit and miss brick details to articulate the lower walls of the blocks in recognition of the pedestrian visibility. The individual entrances would be

defined by colour, using glazed brick and matching door colour and underside of canopy.

- 6.4.45 The three tower blocks forming part of A1 would have similar brick piers as those shown on Block A2 and A4 and similar hit and miss brick detailing at lower level. The inset brick (located in between the piers) would be darker in colour and an alternate rusticated red colour is proposed for the windows and balconies. The lower five storey elements would be set back and would be constructed in metal cladding similar to that used in Block A4. The residential entrances would be double height and expressed with colour brick and matching canopy soffits.
- 6.4.46 The southern end of Block A5 would have similar articulation as the gable ends to the green link; however the brick piers are not protruding on this elevation. The western wing of this block would have similar articulation, but would also consist of a metal clad infill section bridging the end gable liner block and the north western wing of this block. Similar materials would be applied to this block as those to be used in Block A4.
- 6.4.47 Overall, it is considered that the appearance, whilst of modern in appearance would be consistent with similar high density developments found in the borough. The inclusion of specific industrial reference into the built form would help to identify the sites industrial past and thereby creating its own identity. However, in order to ensure a high quality finish, it is necessary to condition details for all external materials. It is also considered necessary to condition further detailed cross sections for the window reveals (including those to non-residential spaces), large scale drawings showing the arrangement of the hit and miss brick detailing, the brick bond, the stack soldier header to openings, the brick piers, the glassed brick and canopy detail for all communal and individual entrances.
- 6.4.48 No details of the arrangements for the accommodation of external services (telecommunications equipment, any extraction plant etc) have been submitted with the application. However it is considered that such details can also be adequately controlled by condition.
- 6.4.49 It is considered that details pursuant to condition 7 can also be approved as the Urban Design Report provides the approach to the design and how it addresses the relevant Design Guidelines for that phase.

#### Landscaping

- 6.4.50 Although landscaping forms one of the reserved matters, as part of this reserved matter application the applicant is required to discharge the following conditions

Condition 19:

*Applications for approval of Reserved Matters for each relevant phase submitted pursuant to this permission relating to layout and landscaping shall explain the approach to the landscaping for that phase in relation to the*

*landscape principles set out in the Design and Access Statement and Design Guidelines (June 2015), including planting plans, a schedule of plants, including plant sizes and proposed numbers, as well as details of hard landscape materials, boundary treatments and street furniture.*

*The development shall be carried out in accordance with the details so agreed.*

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

*The development shall be carried out in accordance with the details so agreed.*

*Applications for the approval of Reserved Matters for each relevant phase shall include a detailed Open Space Strategy for the provision of open space which will ensure that on completion of each relevant phase that the amount of open space to be provided on each relevant phase is no less than that shown on drawing No. HVE(00)AP101. The details shall include any temporary landscape works (including any public art/ boundary detail) to be provided along the boundary of Phases A and D where they relate to those phases. The development shall be carried out in accordance with the Open Space Strategy and thereafter retained, unless otherwise agreed in writing.*

- 6.4.51 The proposals for Development Zone A, have been the subject of several pre application meetings and the proposals in the landscape drawings reflect these discussions.
- 6.4.52 The applicant has submitted a detailed landscape strategy for all public and private areas. This application is accompanied by a Landscape Design Report, which sets out the materials proposed to form the new landscaping for the development, types of street furniture and enclosures. It also details the proposed planting strategies that seek to utilise a varied colour palette to add interest and enhance biodiversity.
- 6.4.53 As this is the first phase of the masterplan, this phase will see the start of the park entrance from Headstone Drive. The main linear park (green link) would comprise of trees, shrubs and meadow grass, combining with meandering footpaths, swales, sitting and play areas. The green link would link into the future phase due north and would form a strategic pedestrian/ cycle route through the site and linking to the Harrow View West arm of the green link. The link would serve as both as a visual amenity and a functional space for residential and local community. In addition to the green link a central green square is proposed that links to the green link. This central green would comprise of generous open space, planted flower gardens, seating and the main childrens' play space. The layout would also allow for variety of commercial activities.
- 6.4.54 The pavement edge directly adjacent to the site along Headstone Drive would be widened to provide a safer and greener pedestrian experience. Landscape would feature new street trees, shrub planting and an integrated cycleway.

- 6.4.55 The primary road would also have street tree planting and rain gardens interspersed with on-street parking. Elsewhere, the vehicular routes are shared with pedestrian and cyclists, between the blocks and adjacent to the green link.
- 6.4.56 With the exception of Block A5, each of the residential buildings would have raised courtyard gardens/ roof terraces which are largely soft landscaped to create an overriding lush outdoor environment for residents. These courtyards would create different outdoor rooms for play, socialising, relaxing and attracting wildlife.
- 6.4.57 The proposal has been reviewed by the Council's Landscape Architect and has provided the following feedback/ comments on the proposals:
- a) A1 area: Additional tree planting required adjacent to car parking, along the eastern boundary, to soften the parked cars and enhance the biodiversity. Refer to Illustrated masterplan Drawing Nos TM276L01 Rev C01, in the location where number 8, car parking on drawing is annotated.
  - b) Green and Brown roof detail: Further detail required for the green and brown roofs and including the substrate, roof detail build up and the proposed planting.
  - c) A levels GA plan has been submitted at a scale of 1:500. Detailed Levels Plans are required at a smaller scale. This document is to explain details of the levels of the buildings, roads and footpaths, in relation to the adjoining land and highway, and any other changes proposed in the levels of the site.
  - d) All the existing trees in the site are to be removed due to the proposed changes in existing ground levels adjacent to Headstone Drive, including the single and group TPO trees. This has been agreed previously. Turkington Martin drawing, Trees to be removed and retained GA shows one tree to possibly be retained, drawing number TM276L05 Rev C01. If this tree is to be retained a Tree Protection Plan would be required. The tree is outside of the red line, but adjacent to the proposed development therefore would require protection.
  - e) There are inconsistencies in the proposed planting types: Landscape Statement - Item 5.2, page 26 notes a mix of native vegetation proposed for the Green Link. Item 10.4.1 Green Link Planting Concept (SP1) page 99, notes Native shrubs, ferns and woodland planting – the species proposed for the Green Link are mainly ornamental, some are ornamental varieties of native plants, in Item 10.4.1 – PL8 Ornamental Shrub and Climbers and PL9 (Low Planting, Ferns and Woodland Bulbs, pages 99, 100, 101, and PL8 drawing TM276L10 rev C01 notes native shrubs and climbers (mostly ornamental plants). The planting objective for the Green Link will need to be clarified, if it is to be semi ornamental and native, to improve biodiversity and provide seasonal change, colour, texture and form. Proposed planting types can be clarified under the landscape condition.



- f) The proposal for temporary art works, photography themes and interpretation of the former site use would enable an understanding of the history of former site, provide visual interest and reduce the possible feeling of an environment surrounded by a derelict building site. The proposal is welcomed and should be conditioned, to secure a high quality solution. Refer to Furniture and Enclosure Strategy - page 41 and 42 of Landscape Statement, and the proposals for temporary edge treatment between Aperture Works and future development phases, with artist involvement along key elevations, such as the end of the Green Link and Primary Street.
- g) The lighting condition hasn't been fully met. The lighting strategy and Turkington Martin lighting general arrangement layout drawing appears to be acceptable but, there is insufficient detail. The lighting columns and bollards are marked on the Turkington Martin GA drawing, but there is no key to explain the various lighting columns, bollards lights and any other lighting. Lighting detail is required for the buildings, roof terraces, pergola. A drawing is required to show light spillage and light levels together with further lighting details and a specification. A Lighting condition would be required since there is insufficient detailed information about the lighting locations and lighting levels.

6.4.58 Officers consider that point a) this cannot be achieved as there are underground services running parallel to the site boundary an underground culvert.

6.4.59 Point b) can be conditioned.

6.4.60 In response to point c), the applicant has provided a levels plan, however further detailed proposed levels at a scale of at least 1:100 are required and existing levels for the land adjoining the subject site is also required to ensure that the proposed development would relate appropriately to the surrounding area. Although it is noted that the existing levels adjoining the highway of Headstone Drive have been provided, the current levels plan submitted does not provide details of the existing levels for all of the adjoining land or highway.

6.4.61 In relation to point d), this tree in question is not protected by a TPO. However, it is considered that a standard condition requiring tree protection fencing to be erected to safeguard any trees retained on site, prior any construction works undertaken shall suffice for this purpose.

6.4.62 Whilst the applicant has provided an overview of the landscape proposals, which includes the types of plants, plant palette, tree locations etc. they have not provided the exact location and numbers of the shrub/ low level planting in the ground. Although it is noted that they have stated broadly that certain number of species of a plant would be planted per square metre. However, no detailed planting plans to that effect have been provided, which should be at a scale of 1:100 and which are expected for the scale of development being proposed. This relates to hard and soft landscape areas relating to the green link, central square, private courtyards and roof terraces, street level, public realm and any private residential space. Details should include any furniture,

boundary treatment, play equipment, irrigation if proposed, specification for the proposed pergola and detailed drawings of such; details of the vent grilles to all communal areas including any vent screening and details of any signage to the public realm. Whilst the landscape strategy includes indicative cross sections for the open spaces, full scale metric cross section plans would be required for all open spaces, including private communal open space. Full elevations and cross-sections would also be required for the podium including the proposed details for the external walls (including ventilation) for the podium deck and should include tree planting/ fixing details for the podium levels.

- 6.4.63 The applicant has provided an overview strategy for the public art that could form part of the temporary site boundary adjoining the later phases. Whilst this is welcomed in principle, further details such as elevations, images of the proposed art work and materials to be used are required to reinforce this strategy. It is considered that further details can be secured by condition. The applicant has provided a strategy for the open space which is considered acceptable to broadly to meet the requirement of condition 22, however as noted above further information is required for the temporary boundary and art work.
- 6.4.64 In respect of point g) relating to lighting, this has been addressed elsewhere in this appraisal and an appropriate condition is recommended.

#### Refuse

- 6.4.65 Condition 16 requires:  
*Applications for approval of Reserved Matters for each relevant phase submitted pursuant to this permission relating to layout, access and landscaping shall be accompanied by a detailed Refuse Strategy for that phase. This document shall explain:*
- (a) the storage and disposal arrangements for refuse and waste associated with private buildings, including vehicular access thereto;*
  - (b) the storage and disposal arrangements for refuse and waste associated with proposed public realm areas, including vehicular access thereto;*
  - (c) the hours of proposed waste collection; and*
  - (d) the proposed Waste Management Plan for public realm areas.*
- The development shall be carried out in accordance with the details so agreed. A detailed Refuse Strategy is only required to be submitted and approved once per phase.*
- 6.4.66 London Plan Policy 5.13 requires development to minimise the generation of waste and maximise reuse or recycling. These sentiments are echoed in Core Strategy Policy CS1 X. Policy DM45 of the Development Management Policies Local Plan document requires proposals to make satisfactory provision for general waste, the separation of recyclable materials and the collection of organic material for composting. 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).

- 6.4.67 The Code of Practice recommends a 'two bin' system for blocks of flats, comprising storage provision for general waste and recycling. Provision should be made for large blue bins for recycling (1280 litre) and large dark grey bins (1100 litre) for every eight flats. In terms of the number of bins to be provided to serve the development, the applicant as provided the number of bins to be provided for each block which has been broken down further by the number of flats per core within each block. The number of bins specified in the refuse strategy (contained within the UDR) would be consistent with the Council's code of practice and therefore in this regard the proposal would comply. However, the proposal does include a number of ground floor maisonettes which would feature their own front gardens and refuse stores. It is not clear from the proposed plans or the accompanying refuse strategy whether the proposals would be able to accommodate the required number of bins. Officers consider that such details can be secured by condition.
- 6.4.68 In terms of the non-residential uses, the number of bins has not been specified at this stage as it is unlikely that this information would be available until an end user of these units takes occupation. Notwithstanding this, the scheme does include designated refuse stores that are well proportioned to accommodate the required number of bins.
- 6.4.69 The applicant's refuse strategy shows the route for the refuse vehicles and the sweep path analysis undertaken by the transport consultant demonstrates that the sweep path would provide safe and clear route for the refuse vehicles along the primary, secondary, tertiary and shared surface routes. Refuse collection vehicles would be able to stop within 10m of the entrance to the majority of the refuse stores at the site. However in the case of the refuse stores being sited more than 10m from the roads, refuse will be managed and moved by the applicants management company to a suitable collection point as identified on the refuse diagram shown in the UDR. Refuse vehicles will have the ability to stop along the primary road to access the refuse stores/ collection points for Blocks A2, A2 and cores 1 and 2 of Block A4. The refuse vehicle then can continue by entering the Tertiary route for access to Block A4 and Block A5 (cores 1 and 2) refuse stores.
- 6.4.70 As for the residential dwellings with individual refuse storage within their own plots, these can be accessed directly in the case of those units in Blocks A1 and A4. However, the ground floor maisonettes located in Block A2 would be required to move their bins to a dedicated hard standing along the primary road. This does raise some concerns over how these would be managed, as it would not be appropriate to have bins left on the public realm for a long period of time, a most likely scenario being the whole day. Further clarification is needed in this regard and preference would be that the applicant's management company also ensure that the private bins are returned to their location once the refuse has been collected. In this regard, details of such can be addressed by condition as they relate to layout and landscaping are the reserved matters.
- 6.4.71 It is intended as an interim strategy, until the later phases come forward, collection from Block A3 and core 3 refuse store of Block A5 will be managed and moved to a collection point located at the first junction of the tertiary road

and the green link. In future, refuse vehicles would be able to continue along the road between Block A5 and the green link to easily access Block A5-core 5 and the access to the refuse store in A3 would be via Rokeby Road. The refuse collection stand shown on the refuse diagram for these blocks appears to be sited across a landscaped area, so it is not clear exactly where the bins would be held temporarily at this junction and if indeed some interim strategy needs to be put in place until the later phases come forward. Accordingly, this is also requested by condition. If a temporary hard standing is required, the condition will also ensure that once the later phases are fully operational, the temporary hardstanding is reinstated as soft landscaping.

- 6.4.72 With regards to the commercial uses, the collection of refuse would be undertaken via the same route as for the residential. However, the commercial businesses are responsible for any management of refuse bins to the collection points. In respect of the commercial units located in the ground floors of Blocks A1, A2 and A4, the refuse stores are within collectable distance to the respective road/ access route. However, in respect of the Health Centre located in Block A5, there is no direct access for refuse vehicles along this shared route until later phases come forward. As the applicant would not be in control over the management of the refuse bins for this unit, it is considered necessary to include a condition requiring the end user of that unit to not occupy the unit until a refuse collection strategy has been agreed. This would ensure that appropriate measures are in place to bring the bins down to collection point on collection day and then return the emptied bins back to the refuse store within reasonable time to ensure that there is no impedence to the public route.
- 6.4.73 In respect of criterions b), c) and d) of condition 16 no details have been provided with regards to the storage and disposal arrangements for refuse and waste associated with the proposed public realm, the hours of proposed waste collection and the proposed waste management plan for the public realm areas. Whilst it is noted that the accompanying landscape plans provide an indicative location for litter bins for the public realm areas, there is no information with regards to the management of waste collection. However, Condition 30 sub-section b) requires details of a scheme for waste management in the public realm. As such, Officers consider that the limited information relating to the waste management of the public bins at this current stage would be adequately dealt with under condition 30.

#### External Lighting

- 6.4.74 Condition 15 requires:  
*Applications for approval of Reserved Matters for each relevant phase submitted pursuant to this permission relating to layout, access, appearance and landscaping shall be accompanied by a detailed Lighting Strategy for that phase in line with the Code of Practice for the Reduction of Light Pollution issued by the Institute of Lighting Engineers. This document shall explain:*  
*(a) the lighting proposed for public realm areas and streets, including relevant justification;*  
*(b) the proposed external building lighting.*  
*The development shall be carried out in accordance with the details so agreed.*

- 6.4.75 The applicant has submitted a lighting strategy for all public realm areas and has stated that the external lighting to building is not available at this time as this would be designed at M&E stage. Although it is noted that the applicant will at the detailed stage incorporate lighting to all entrances and points of access and that lighting would also be provided for the balconies.
- 6.4.76 The lighting along Headstone Drive would broadly follow what is current in existence along this adopted highway. Along the primary road, tertiary and shared route similar illuminance lighting columns are to be provided. The green link would consist of lower light levels, primarily consisting of low bollard lighting illuminating the footpaths. Column lighting is proposed along key points to provide adequate safety lighting. The central green would comprise of similar lighting columns as that proposed along the primary road and lower bollard lighting. A general lighting layout plan has been submitted, but this is not reference with a key to clearly identify the reference numbers annotated on the plan.
- 6.4.77 The overall strategy can be supported in general, however further lighting detail is required for the buildings, roof terraces and pergola. A drawing is required to show light spillage and light levels together with further lighting details and a specification. A Lighting condition would be required since there is insufficient detailed information about the lighting locations and lighting levels and how this relates to the landscaping details.
- 6.4.78 In this regard, it is considered necessary to attach a further lighting condition requiring the above to be submitted.

## 6.5 Residential Amenity

### 6.5.1 Residential Amenity of Future Occupiers

#### ***Policy Context***

- 6.5.2 There are no specific policies within the AAP which deal with safeguarding residential amenity but it states that development proposals would be required to meet policy DM1 of the Development Management Policies Local Plan (2013), which seeks to ensure that “proposals that would be detrimental to the privacy and amenity of neighbouring occupiers, or that would fail to achieve satisfactory privacy and amenity for future occupiers of the development, will be resisted”. Policies DM27 relating to amenity space and DM28 children and young people’s play facilities are also applicable.
- 6.5.3 Policy 3.5C of The London Plan requires all new residential development to provide, amongst other things, accommodation which is adequate to meet people’s needs. In this regard, minimum gross internal areas (GIA) are required for different types of accommodation, and new residential accommodation should have a layout that provides a functional space. Table 3.3 of The London Plan specifies minimum GIAs for residential units and advises that these minimum sizes should be exceeded where possible. The policy also provides a

commitment that the Mayor will issue guidance on implementation of the policy, and this commitment is fulfilled by the publication of the Mayor's Housing SPG (2016). The SPG sets out detailed guidance on a range of matters relating to residential quality, incorporating the Secured by Design principles, and these form the basis for the assessment below. The use of these residential unit GIA's as minima is also reiterated in Appendix 1 of the Residential Design Guide SPD. This is supported by policy AAP13 of the AAP.

## ***Appraisal***

### *Defining good places*

- 6.5.4 As stated above, the redevelopment of this site would contribute positively to the urban renewal of this part of Wealdstone. It would provide a number of prominent new buildings within the streetscene with a clearly defined entrance points from Headstone Drive and opportunities for new landscaping to the street frontages and creation of new public open space running through the site. It would also add to levels of natural surveillance of the immediate surroundings. It is therefore considered that the proposal would enhance the quality of this part of area in accordance with the principles of London Plan Policy 3.5.

### *Communal outdoor amenity space*

- 6.5.5 The proposal would make provision of podium level amenity space to serve development plots A2, A3 and A4 and roof top terraces for development plot A1. In addition to this, residents will also have access to the central green square and green link which would provide additional communal outdoor amenity space. Whilst it is noted, plot A5 does not have access to a dedicated private communal amenity, it fronts the green link which would still offer a form of communal outdoor space. Overall it is considered that the different forms of communal space being offered would be a benefit of the scheme and improving the environment of these properties. The space would benefit from high levels of natural surveillance and would be of dimensions/configuration that would lend itself to domestic recreational activities.

### *Outdoor play space*

- 6.5.6 Local Plan Policy DM28 requires on site provision of facilities where a development would result in a net increase in child yield. Applying the child yields at Appendix 1 of Harrow's Planning Obligations SPD, it is calculated that the development would yield a total 526 children across all age ranges.
- 6.5.7 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. When applied to the above child yield, this generates a requirement for 2,104sqm play space. The proposal would provide up to 2,830sqm, comprising of 472sqm of dedicated play space located in the central green and additional spaces in the green link, 408sqm of courtyard play space built on the landscaped podiums and roof spaces. Other spaces include 400sqm of dedicated recreation spaces in the central green and on the landscaped podium of block A3 and 1,550sqm

of natural space across the green link. Whilst it is noted that the supported landscape strategy adopts the GLA's Play and Informal Recreation SPG (2012) benchmark to calculate the child yield and the resultant play space requirement. Officers consider that the Council's Planning Obligation SPD, provides a better analysis the local play space requirement and as such has applied this in assessing this application. Notwithstanding this, the overall play space provision exceeds what would be required for the size of the development proposed and as such the proposals are acceptable in this regard.

#### *Entrances and approach/ active frontages*

- 6.5.8 The Mayor's Housing SPG calls for entrances to be visible from the public realm and clearly defined. The proposals show that the communal entrances to the apartment blocks across the different development plots would be defined by glazed doors and canopies with colour soffits and in the cases of entrances fronting the primary road, central green, green link and territory routes, entrances would be further defined by glazed bricks in matching colour to entrance canopies. This would help to accentuate the entrance points into the building. With regards to the entrances of block A1, these will enjoy double height glazing to emphasise their presence and connection with the street. The entrances to the individual maisonettes along the primary road, fronting the central green, green link and territory road would be defined with colour panels or glazed bricks with colour doors and underside of canopies to match.
- 6.5.9 All entrances would be afforded naturel surveillance from the communal open spaces and from the overlooking permitted from the development itself. The proposals in this regard are considered to be acceptable and the entrances would help define and activate the street frontages.

#### *Shared circulation*

- 6.5.10 The SPG sets out a number of guidelines for shared circulation space, which includes the numbers units that are accessed from each core (eight units); the provision of entry phone, or audio-visual verification to the access control system where applicable; natural light and adequate ventilation where possible; in schemes with more than eight storeys the provision of two lifts; and in the case of those buildings with wheelchair units the provision of more than one lift.
- 6.5.11 Within block A1-A, each core would have access to two lifts and each core would not serve more than eight dwellings. The two cores located in the southern end of the block would have natural lighting. Within block A1-B/C, the cores would generally not serve more than eight dwellings, however on the 2<sup>nd</sup>, 3<sup>rd</sup> and 4<sup>th</sup> floor of this block a single core would serve ten dwellings. Whilst this slightly exceeds that recommended in the SPG, this core would be served by two lifts and would be afforded natural lighting. In all other regard this block would be acceptable in terms of circulation.
- 6.5.12 With regard to plot A2, the block fronting the central green would have dwellings that can be accessed by either of the cores situated at the ends of this block. It is noted that both these cores would be served by a single lift, however, given

that there is a linked access to both, effectively residents of these block would have access to two lifts. These cores when assessed cumulatively would not serve more than eight dwellings per core. Furthermore, both cores would have natural lighting. The front block on Headstone Drive would be fully compliant with the SPG guidance.

- 6.5.13 The block on plot A3 would have a single core which would be served by two lifts and the number of dwellings per floor would not exceed eight.
- 6.5.14 The blocks on plot A4 would have a similar circulation as plot A2, with cores having single lifts and dwellings from 2<sup>nd</sup> floor onwards having access to two cores and cumulatively the number of dwellings per core not exceeding eight.
- 6.5.15 With regards to plot A5, the core on the territory road would be served by two lifts. The cores accessed from the green link would be served by a single lift and again dwellings can access either core, so effectively dwellings would have access to both lifts. As with other blocks on this site, cumulatively the number units per core would not exceed eight.
- 6.5.16 In regard to shared circulation, the proposals are considered too broadly meet the guidance contained in the SPG.

*Dwelling space standards / internal heights/ flexibility*

- 6.5.17 The minimum space standards are set out at Table 3.3 of the London Plan and are reproduced within the SPG.
- 6.5.18 The proposed 1bed, 2bed and 3bed units are all shown to exceed the minimum space standards. The individual rooms within the flats are of good layout and size and suitable internal circulation space is provided in all units. In this respect the proposal is considered acceptable. The development would also achieve the minimum floor to ceiling height of 2.5 metres as required by the Housing SPG.
- 6.5.19 The SPG requires built in storage space to be provided in all new homes. The proposal is shown to provide an adequate level of storage space for each of the units. To ensure compliance with this standard, it is considered necessary to secure this as a condition of any planning permission.
- 6.5.20 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.
- 6.5.21 Policy 3.8(c) of the London Plan relating to Housing Choice, requires 90% of homes should meet building regulations M4 (2) – ‘accessible and adopted dwellings’. Policy 3.8(d) will require 10% of new housing to meeting building regulations M4 (3) – ‘wheelchair user dwellings’. The accessibility requirement of the scheme is considered in detail elsewhere in this appraisal.



### *Private open space*

- 6.5.22 The SPG requires a minimum of 5sqm per 1-2 person dwelling and an extra 1sqm for each additional occupant. Every flat would have a private balcony space or roof terrace which would meet the required standard recommended in the SPG. Some of the larger 3 bed units are shown to have dual balconies to meet the required standards. The SPG also calls for a minimum depth and width of 1.5 metres for all balconies and other private open spaces. The proposed balconies and roof terraces would comply with these minimum dimensions.
- 6.5.23 In addition to private balconies, residents within blocks A1, A2, A3 and A4 would have access to private communal gardens, which is also consistent with the guidance contained in the Mayors SPG.

### *Privacy*

- 6.5.24 The SPG calls for habitable rooms within dwellings to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces. Paragraph 2.3.36 of the SPG refers to yardstick separation distances of 18-21 metres between facing habitable room windows.
- 6.5.25 As a high density scheme there would inevitably be some overlooking relationships between homes within the development. These occur in elevations fronting the podium level and where buildings have stepped building lines. These elevations would, of course, all contain habitable room windows and balconies, meaning that there would be a high level of visibility between homes on the same level (i.e. looking directly across) and perceptions of visibility to/from homes on other levels within the development. Given the high density nature of the proposal, which is consistent with the need to make effective use of this accessible previously-developed site, and the likely expectations of the future occupiers of such a development, this is not considered to be unacceptable. 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.
- 6.5.26 A number of the balconies and roof terraces throughout the development would be sited adjacent to each other, or adjacent to neighbouring windows. This could be either resolved by erecting a privacy screen on the flank side of the balconies nearest the neighbouring windows or alternatively moving the balconies further so that there is some distance maintained between the balconies and neighbouring windows. Such details can be conditioned. Where there are instances when two balconies adjoin, these would be provided with privacy screens to protect the privacy of the occupiers of each respective unit.
- 6.5.27 There are four flats located within the first tower block on plot A1 (forth south side) that have flank secondary windows that serve the living/ kitchen areas to these units. These windows would have direct outlook over the roof terraces to

the adjacent flats. As these windows are secondary, it is considered that these could be conditioned to be obscurely glazed to prevent any direct overlooking of the neighbouring roof terraces.

- 6.5.28 In terms of privacy between the different blocks within the development site, sufficient distant would be maintained to ensure that there is no unnecessary loss of privacy.
- 6.5.29 The first roof terrace to Block A1 would maintain a separation distance of 9m from the opposite flank elevation to the first tower block. In terms of the flank elevation distances between the other two tower blocks distances of at least 16m would be retained. Other than the rear elevation (containing bedroom windows and secondary living room windows) of the front block located on Headstone Drive, most of the windows in the flank elevations of the tower blocks would be secondary windows.
- 6.5.30 In terms of the internal elevations facing courtyard/ podium, Block A2 at its tightest point would maintain a distance of just under 12m from opposing elevations. Whilst this is quite short, given the irregular layout of this block the opposing internal elevations are splayed and therefore windows in the front block are set at an oblique angle to those located in the block located adjacent to the central green. Furthermore, the distance between the inner elevations widen as you move along north along this development plot.
- 6.5.31 Block A3 would maintain a separation distance of at least 22m from the facing elevation to the proposed care home. Block A4 would enclose the podium on all sides and would maintain a minimum separation distance of at least 28m from opposing elevations.
- 6.5.32 As noted under the layout section of the appraisal, the ground floor maisonettes located in Blocks A1, A2, A4 and A5 would maintain sufficient defensible zones from the public realm to ensure the privacy of the occupiers of these ground floor units.
- 6.5.33 On balance, having regard to the high density nature of the proposal, which is consistent with the need to make effective use of this highly accessible edge of town centre site and recognising that those choosing to live in a high density development are likely to have different expectations about privacy, it is considered that the relationships between residential buildings would secure a standard of privacy that would be commensurately high for the vast majority of future occupiers.

#### *Dual Aspect*

- 6.5.34 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.

- 6.5.35 The applicant has sought to exploit opportunities where possible to create dual aspect dwellings. However, it is noted that a large proportion of the units would be single aspect given the constraints of the site. Whilst the preference would be for dual aspect units, the proposed units would have south-east/ west and north-west/ east facing aspects and thereby each unit would receive adequate levels of natural daylight. It is considered that the single aspect nature of this development would be off-set by the good internal layout and circulation for each of the units.

#### *Noise*

- 6.5.36 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.
- 6.5.37 Due to the Block configuration and the number of single aspect units, a number of flats would have bedrooms sited adjacent to living/ kitchen areas of adjoining flats. In the case of the cores to Blocks A1-A, A3-A and A5, a number of habitable rooms would be sited adjacent to the lift shaft. Whilst this is not ideal, in most cases due to site constraints, this is unavoidable. However, having regard to the fact the development would be a new build and therefore would be required to ensure that sufficient noise insulation is provided to meet Building Regulations. When considered against the requirement for thermal installation also, it is considered that sufficient level of noise mitigation would be achieved to provide a good level of accommodation for future occupiers.
- 6.5.37 The applicant has submitted a noise and vibration mitigation strategy (as required by condition 17 attached to the outline permission) to determine whether any mitigation is necessary to achieve reasonable internal and external noise levels.
- 6.5.38 The report assess the acoustic specification of the external building fabric elements, sound levels in outdoor amenity areas and considers what mitigation measure would be required. A sound and vibration survey was undertaken in August 2017 (during a weekday) to measure the existing circumstances on the site. Results showed dominant noise sources across the site from vehicular movements on Headstone Drive and train movement on the nearby railway when occurring.
- 6.5.39 The assessment shows that with external noise levels in the communal gardens are likely to be below the 'external noise level criteria' set out under BS8233, in the case of the central and rear areas of the site. External noise levels within

the open space located in the front area of the site, adjacent to Headstone Drive are likely to exceed the external noise level criteria. External sound levels to the majority of communal gardens areas set back from Headstone Drive and in screened areas also fall below the criteria and therefore the sound level to these areas would be considered acceptable.

- 6.5.40 Balconies were also assessed which indicated sound levels to be in the range between 46 and 60 dB  $L_{Aeq16hours}$  across majority of the site. Sound levels on the north-eastern boundary and Headstone Drive are likely to be in the range of 61 and 66  $L_{Aeq16hours}$ . However the report does suggest that where balconies have ceilings or the development make use of staked balconies absorptive material should be applied to the underside of the balcony soffit.
- 6.5.41 The proposals have been considered by the Environmental Health Officer (EHO) who considered that for balconies, many will be subject to noise levels higher than the upper guideline. However, the guidance does state that the specification of noise levels to small balconies is not necessarily inappropriate; because of the compromises set out in the guidance in relation to elevated noise levels balanced by other factors, such as location, convenience etc. The report in paragraph 5.3.7 does recommend provision of acoustic material to underside of balcony soffits where practicable.
- 6.5.42 Interpretation of the BS is somewhat subjective. Overall, the EHO agrees with the recommendations of the noise report in the balance struck between noise levels affecting external gardens, open space and balconies. However does recommend a condition to make sure the acoustic treatment of balconies as recommended is carried out. In addition, if not already included the EHO has also recommended the need to ensure that all balcony screening is solid e.g. sheet glass, to provide maximum noise shielding, and not perforated such as railings. Officers consider that, whilst the acoustic treatment can be controlled by condition, given that the design of the balconies would be fixed at the application stage and having regard to the surrounding environment, it is unlikely that any significant noise reduction is likely to be achieved. The provision of solid balcony balustrade would further compromise the architectural quality of the development.
- 6.5.43 The report recommends standards for internal noise levels to the flats which are acceptable. To achieve these, it recommends various glazing specifications, dependent on façade location. It recommends that, when glazing components are subsequently specified, they should be subject to independent acoustic testing. In order to ensure this is carried out, along with evidence of installation, the EHO has requested a suitable condition be imposed.
- 6.5.44 According to the EHO there is no specific mention of provision of acoustic mechanical ventilation. However, the report for the purposes of its assessment and calculation does assume that the proposed dwellings will be equipped with Mechanical Ventilation System and Heat Recovery. On this basis Officers consider that a condition be imposed to ensure that MVHR is installed where required along those façades experiencing the highest noise exposure.

- 6.5.45 Details of plant are not yet known. Therefore the report specifies maximum cumulative plant noise criteria for internal noise levels within adjacent or otherwise affected noise sensitive spaces. These are acceptable, but the Council's EHO has recommended a condition to ensure these criteria will be met when plant specifications are finalised, with follow up acoustic survey to demonstrate installed plant compliance.
- 6.5.46 With regard to the noise impact from the Energy Centre, the plant details are not yet known. Therefore the report specifies noise level criteria to be met within the energy centre, which are acceptable. If these criteria subsequently cannot be met by control of plant noise, then plasterboard ceilings will be required. On this basis, the Council's EHO has recommended a condition to ensure evidence is provided to show plant when selected will meet the recommended criteria, or if it cannot what extra noise insulation will be provided, followed up by an acoustic survey to demonstrate compliance.
- 6.5.47 In terms of vibration, the report demonstrates the development will not be affected by undue vibration, and therefore no vibration mitigation is required.
- 6.5.48 In conclusion, the overview noise and vibration strategy is considered acceptable to meet the requirements of condition 17 of outline permission P/2165/17. However, further appropriate conditions are required to ensure that the development is constructed in accordance with the mitigations suggested in the report and that further details are provided with regard to the plant and energy centre in addition to further noise assessments to demonstrate compliance with the initial noise assessment. The impact of noise from the non-residential uses is discussed in detail below.

#### *Daylight and Sunlight*

- 6.5.49 The SPG (2016) states that *"All homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen and dining spaces should preferably receive direct sunlight"* (standard 32). Supporting paragraph 1.3.45 outlines that *"An appropriate degree of flexibility needs to be used when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties as well as within new developments themselves. Guidelines should be applied sensitively to higher development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and the scope for the character and form of an area to change over time."* Local Plan Policy DM1 includes among its amenity considerations the adequacy of light and outlook within buildings (habitable rooms and kitchens).
- 6.5.50 An assessment of potential impacts on sunlight, daylight and overshadowing has been undertaken and accompanies the application, pursuant to the requirements of Condition 12 attached to the outline permission.

- 6.5.51 The daylight and sunlight report is based on the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight: A Good Practice Guide'. The assessment considers the impact on the site's residential neighbours (discussed in detail elsewhere in this report) and on the quality of sunlight and daylight to the new residential dwellings. The methodology adopted is considered to be appropriate.
- 6.5.52 For the purposes of measuring the performance of habitable rooms within the proposed development, the assessment uses the Average Daylight Factor. This method measures how much sky can be seen from the window and converts the results into a percentage of annual probable sunlight hours received. The BRE guidelines recommend that ADF values of 1% should be achieved in bedrooms, 1.5% in living rooms and 2 % in kitchens. In the case of combined living rooms and kitchen a ADF of 1.5% has been used. The existence of balconies has also been captured within the analysis.
- 6.5.53 A total of 1863 habitable rooms across all floors, daylight amenity on the lower two floors have been assessed, which amounts to 412 habitable rooms (22% of the entire scheme). Based on the results, 329 of the 412 (78.3%) rooms assessed achieved the required ADF for their assessed usage. Given that daylight will improve as you move higher up the building it is expected that at least 90% of the total 1863 habitable rooms will achieve a good level of compliance. The remaining 81 rooms that do not meet BRE guidelines are due to the balconies above or position within the a contained part of the site.
- 6.5.54 In terms of sunlight amenity (Annual Probable Sunlight Hours (APSH)), 102 rooms were assessed, of which 57 rooms achieved the recommended levels of APSH. The remaining 43 rooms, 13 achieve between 20-24 total APSH, 18 achieve between 10-19 APSH and 14 achieve less than 10 APSH.
- 6.5.55 The results of the analysis demonstrate that the majority of habitable rooms will achieve the recommended level of daylight. However, officers also note that some rooms would only have ADF levels of less than 1% and as such there will be a number of apartments within the scheme which are inadequately lit and will receive poor daylight. It is highly likely therefore that some flats will require supplementary electric lighting particularly in the winter months. Despite this, it is also acknowledged the provision of balconies does provide a trade-off between providing easily accessible external amenity space and inevitable shading of windows below/ or recessed.
- 6.5.56 In conclusion, officers consider that whilst clearly it is desirable for a new development to achieve 100% compliance with the recommendations of the BRE guidelines, it is inevitable that a site of the proposed density will require consideration of some compromise between daylight/sunlight, the provision of highly valued residential amenity space (balconies) and other planning considerations that may influence the site layout and orientation of buildings. It should also be emphasised here that the recommended BRE guidelines for daylight and sunlight – whilst a valuable tool for measuring the degree of daylight and sunlight that would be achieved – do not form a part of the adopted development plan. Rather, Local Plan Policy DM1 requires a high standard of

amenity and undertakes to have regard to a range of amenity considerations which includes, but is not limited to, the adequacy of light and outlook. Thus, while more than is desirable of the tested rooms/windows would not achieve the recommended BRE standards, across the development as a whole, it is demonstrated that the majority would. Furthermore, the majority of flats would benefit from a dual aspect, and all flats would meet or exceed the London Plan minimum space standards, and have access to private amenity space. On balance, therefore, it is considered that the poor performance of some parts of the development in terms of the recommended BRE guidelines is not unacceptable. Accordingly, the applicant has provided sufficient detail to approved part b) of Condition 12 attached to outline permission P/2165/17.

*Amenity Impacts of the Proposed flexible A1-A5, B1a and D1 uses*

- 6.5.57 Local Plan Policies AAP 18 and DM41 include criteria requiring the consideration of impacts of uses proposed upon neighbouring residential occupiers. Policy DM1 *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.
- 6.5.58 The main affected units would be those located adjacent to and above the flexible commercial floor space located in the ground floor of Block A2, and A4, the foodstore located in the ground floor of Block A1 and the health centre located in the ground floor of Block A5. It is considered that the proposed flexible uses within the buildings, including D1 and A3-A5 uses, could give rise to some potential noise conflict for the occupiers of the flats above and adjacent, in term of comings and goings and general noise activity associated with such uses. In order to deliver a mixed and balance community on this site, such uses are considered to be appropriate in context of the wider development the regeneration of the local area. It is considered that through appropriate noise mitigations achieved through the fabric of the building would help mitigate some noise impact. The proposal has been reviewed by the Council's EHO who has raised no significant concerns. Any plant and associated venting of these units would be captured by the conditions already recommended above.
- 6.5.59 It is also considered necessary to control the hours of use of the ground floor commercial premises through appropriate conditions.
- 6.5.60 In conclusion, subject to the imposition of appropriate planning conditions, it is considered that the impact of noise could be mitigated through the design of the buildings, by controlling hours of operation and use of external space for the commercial element and by limiting noise levels of any future mechanical plant.

Impact of Development on Neighbouring Occupiers

- 6.5.61 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.
- 6.5.62 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.

### *Daylight and Sunlight*

6.5.63 The applicant pursuant to part a) of Condition 12 attached to outline planning permission P/2165/15, has submitted a sunlight and daylight assessment which has assessed the potential impact of the proposed development upon the adjoining buildings. The following buildings were assessed:

7-12/ 13-18 Gloucester Court  
1-6 Worchester Court  
1-6 Hereford Court  
118 – 182 (evens only) Headstone Drive

6.5.54 In order to establish whether the proposals will have a significant effect on the daylight enjoyed by neighbouring properties, a Vertical Sky Component analysis (VSC) has been undertaken. BRE guidelines states that if the VSC at the centre of a window is less than 27% and it is less than 0.8 times its former value (i.e. proposed reduction is greater than 20%) then the reduction in skylight will be noticeable, and the existing building may be adversely affected.

6.5.55 With regard to daylight, the BRE Guidelines also set out numerical values for Daylight Distribution and seeks to ensure that a significant portion, which is considered to mean at least 0.8 times the existing area of each habitable room, lies in front of the No Sky Line (NSL).

6.5.56 In assessing the sunlight to existing buildings BRE guidelines recommends an assessment in the case of new development would be situated within 90° of due south of a main window wall of an existing building and the section drawn perpendicular to the existing window wall, the new development would subtend an angle greater than 25° to the horizontal measured from the centre of the lowest window. Sunlighting to an existing window can be considered to be adversely affected if it receives less than 25% of annual probable sunlight hours (APSH), or less than 5% of annual probable sunlight hours between 21 September and 21 March, receives less than 0.8 times its former sunlight hours during either period and has a reduction in sunlight received over the whole year greater than 4% of the ASPH.

6.5.57 In assessing the impact on the flats contained within Gloucester Court, this neighbouring site is situated to the south-east of the development site and contains residential accommodation. In terms of daylight, all windows and associated rooms would experience fully BRE compliant alterations in VSC, NSL and APSH.

6.5.58 With regards to Worchester Court, also sited to the south east of the development site, one of the ground floor window experiences a 24.5% alteration in VSC and a first floor window experience a 20.14% alteration In VSC. Given the low percentage deviation and the fact that the windows to this



building are oriented north and there are other habitable room windows, it is considered that there would be no unreasonable harm in terms of daylight to this building. All other windows would be compliant in terms of alterations to the VSC, NSL and APSH.

- 6.5.59 In terms of Hereford Court, also sited to the south east of the subject development site, the six ground floor windows and one first floor window would experience between 21-29% alterations in VSC. However, as with the case of Worcester Court the relevant windows are already north facing and some of the windows would be dual aspect. Having regard to the distance maintained between these neighbouring buildings and the site, it is considered that there would be no unreasonable level of harm. All the other windows would comply with the BRE guidelines.
- 6.5.60 The properties along Headstone Drive would be sited to the south of the site development site and would consist of two storey terraced dwellings. There are 103 main site facing windows of which 22 would experience reduction in VSC between 20-30%. However, again the windows are positioned north facing and therefore already have some reduction in sunlight. The impact in daylight would be off-set by the distance maintained between the properties on Headstone Drive and the proposed development site.
- 6.5.61 It is noted that there would be non-residential buildings located to the south and east of the subject site in form of a health centre, magistrates' court and industrial buildings. As these are non-residential, they would not be afforded the same level of protection as a residential development and furthermore the separation distance maintained between these neighbouring buildings would ensure there is no unreasonable harm.
- 6.5.62 In conclusion, the proposed development whilst would introduce a high density form of development within close proximity to existing building, it has been demonstrated that the proposal would not give rise to an unacceptable level of harm to any residential amenities of neighbouring site so as to warrant a refusal on such grounds. It is considered that the proposal would give rise to no conflict with the development plan policies stated above. Accordingly, part a) of Condition 12 can be approved.

## 6.6 Traffic, Parking, Access, Servicing and Sustainable Transport

### ***Policy Context***

- 6.6.1 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.
- 6.6.2 The London Plan Policies 6.3, 6.9 and 6.13 seek to regulate parking in order to minimise additional car travel, reduce trip lengths and encourage use of other, more sustainable means of travel. The Parking Addendum to Chapter 6 of The London Plan sets out maximum parking standards for new development

dependent upon their use and level of public transport accessibility. It is noted that at supporting paragraph 6A.3A to the Parking Addendum sets out that there is scope for greater flexibility to the parking standards in different parts of London having regard to patterns of car ownership and use, levels of public transport accessibility, the need for integrated approaches to on-site and off-street parking, efficiency in land use and overall impact upon environment and the transport network.

6.6.3 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.

6.6.4 Condition 20 requires:

*Applications for approval of Reserved Matters for each relevant phase submitted pursuant to this permission relating to layout and access shall be accompanied by a detailed Transport Strategy for that phase. This document shall explain:*

- (a) a detailed Parking Management Strategy for that part of the development (including car club provision);*
- (b) details of cycle parking provision for each of the proposed uses;*
- (c) details of electric car charging points (active and passive);*
- (d) details of pickup and drop off facilities for the primary school (in applications relating to the primary school only);*
- (e) details of motorcycle and scooter parking;*
- (f) details of pedestrian and cycle routes throughout that part of the scheme and how this relates to the overall site-wide approach as set out in the Design Guidelines;*
- (g) details of pedestrian and vehicle signage and wayfinding within the development;*
- (h) details of enforcement procedures for parking offences on unadopted roads;*
- (i) a full multi-storey car park management plan where applicable;*
- (j) a summary of how the approach relates to the original Transport Assessment; and*  
*The development shall be carried out in accordance with the details so agreed.*

6.6.5 The applicant is provided a transport strategy in response to the above condition. The transport consultant has produced a Technical Note (ref TN 5501/002A), in response to the comments submitted by TfL. This has been incorporated into the appraisal below.

*Criterion (a)*

- 6.6.6 With regard to requirement (a) – the applicant has provided a breakdown of the parking spaces to be provided across the site by use. Whilst the transport strategy states an overall provision of 264 spaces, table 3.3 of the transport strategy when added together comes to 261 spaces. This would still achieve a ratio of 0.4 for this site. The proposed ratio of parking for the site has already been agreed at 0.3 at outline stage. This site has good public transport access being close to Harrow and Wealdstone station. This does mean that non-residents may be tempted to park on the site to commute. The proposal is for parking courtyards to be protected with access gates so non-residents or people who do not have an allocated space will not be able to park. The proposals have been assessed by the Highways Authority and they have confirmed that they are satisfied with the details in this regard. However, they have stated that the proposal for two visitor bays for this site is very low. These are intended for the adopted section of road and if marked, need to be in accordance with TSRGD 2016 which does not specify a 'visitor' bay. This level of provision is unlikely to cater for possible demand for the proposed number of residential units. Whilst Officers acknowledge that the number of visitor parking numbers is low for the site, given the site constraints and the need to balance appropriate public realm, the site has provided the maximum level of on street parking that can be achieved on street. Visitor parking bays have been provided for the health centre and the commercial units located in Blocks A2 and A4. The Technical Note does state that parking provision at the development has been maximized within policy and viability requirement. However, the applicant has stated that the two residential parking bays currently located on the tertiary roads between Blocks A4 and A5 could be converted to visitor bays. This would bring the residential parking level to 0.32 per unit. The applicant has confirmed that tradespeople will be able to park in the visitor bays and that there would be sufficient carriageway width to allow refuse vehicles to pass trade vehicles waiting on street.

*Criterion (b)*

- 6.6.7 In terms of the cycle parking provision, the proposed level of cycle parking is accepted. The highways authority has requested details of the types of storage should be supplied going forward. The applicant has confirmed in their Technical Note the provision of secure Sheffield stand spaces and two-tier stand spaces. All long stay commercial spaces are shown to be Sheffield stand spaces. The relevant tables relating to cycle numbers have been amended accordingly.

*Criterion (c)*

- 6.6.8 Electric Vehicle charging point – The applicants transport strategy states that 20% of the parking bays will include electric vehicle charging and will be allocated to residents with an electric car on a first-served basis. The applicant will offer the provision of active electric charging for an additional 20% of residential parking bays, subject to resident's take-up within 3 months of marketing the units. Should some spaces not be taken up, these spaces will then be sold without electric vehicle charging provision. The highways authority have requested this proposed policy to be clarified, as it is not clear if the intention is to provide as per London Plan requirements. The applicant has

confirmed by the Technical Note that 20% active space and 20% passive spaces will be provided.

*Criterion (d)*

- 6.6.9 School drop off/pick up, is not applicable as the school is not part of this reserved matters application.

*Criterion (e)*

- 6.6.10 The Council's highway authority have stated that with regard to motorcycle parking one more space is required to satisfy DM42 of the Harrow Development Management Policy, which requires the provision of 1 motorcycle space per 20 car parking spaces. The applicant has confirmed in their Technical Note that an additional motorcycle space will be included within the parking courtyard serving Block A5, adjacent to the disabled parking bay in the northwest corner. In this regard the proposal is acceptable.

*Criterion (f)*

- 6.6.11 With regards to pedestrian and cycle routes, the intentions for the pedestrian and cycle routes are considered to be acceptable by the highways authority. The applicant has provided further details in their Technical Note in response to the comments raised by TfL.

*Criterion (g)*

- 6.6.12 In terms of the pedestrian and vehicle signage/wayfinding, the proposed signage is welcomed. There is a contribution for Legible London signs which may serve the purposes mentioned in the strategy eg. At either end of the Green Link. The applicant have provided further informal in their Technical Note in response to TfL's comments.

*Criterion (h)*

- 6.6.13 Enforcement procedures on unadopted roads would be carried out by the management company which is acceptable. The proposed parking spaces will be within gated courtyards and allocated to individuals. The highways authority has no objection in this regard.

*Criterion (i)*

- 6.6.14 Is not application for this phase.

*Criterion (j)*

- 6.6.15 The transport strategy sets out a summary of how approach relates to original Transport assessment and the highways authority is satisfied with this.
- 6.6.17 With regards to subsections a) and b) of Condition 16, the highways authority has confirmed that they are satisfied with the refuse vehicle access arrangements.
- 6.6.18 Based on the above, it is considered that the details pursuant to Conditions 16 and 20 can be approved.

## 6.7 Development and Flood Risk

- 6.7.1 London Plan Policy 5.12 *Flood Risk Management* 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.
- 6.7.2 Core Strategy Policy CS1 U undertakes to manage development to achieve an overall reduction in flood risk and increased resilience to flood events. Policy AAP9 of the AAP calls for 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.
- 6.7.3 London Plan Policy 5.13 states that development should utilise sustainable urban drainage systems (SUDS) and should aim to achieve greenfield run-off rates and this objective is reiterated in Policy AAP9. Policy 5.13 of the London Plan sets out a drainage hierarchy to manage surface water run-off as close to its source as possible.
- 6.7.4 Condition 13 requires:  
*Applications for approval of Reserved Matters for each relevant phase submitted pursuant to this permission relating to layout and landscaping shall be accompanied by a detailed Surface Water Drainage Strategy for that phase. This document shall explain:*
- (a) the proposed use of Sustainable Urban Drainage Systems (SUDS) to manage surface water run-off, including the provision of soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands;*  
*(b) surface water attenuation, storage and disposal works, including relevant calculations;*  
*(c) works for the disposal of sewage associated with the development.*
- 6.7.5 The applicant has submitted a surface water drainage strategy in respect of the above condition.
- 6.7.6 The drainage strategy confirms that the surface water strategy will utilise the existing Thames Water surface water sewers within Headstone Drive and the access road to the Kodak site. The surface water drainage strategy seeks to provide attenuation on the site to reduce the total peak discharge from the site to 5 l/s/ha for the 1 in 100 year storm event and in addition would be designed to allow a 35% climate change which will seek to reduce the peak run-off rate to a practical minimum. It is proposed to utilise open surface SuDS in form of bio-retention areas and a swale situated within the green link of the development. Other mitigations would include the utilisation of permeable paving, cellular storage and blue roof deck to drain systems on roofs and podiums. The strategy

confirms that the proposed system will follow the principles of the NPPG SuDS requirements by reducing floors risk and removal of pollutants/ contaminants through the use of filtration, trapped gullies and catchpits/ silt traps.

- 6.7.7 The foul drainage strategy would utilise the existing sewer connections within the southern boundary of the site, discharging into the Thames Water network in Headstone Drive and existing foul sewer within the Kodak access road. The strategy confirms that a private maintenance contractor will be responsible for the long-term maintenance of the proposed SuDS systems and will undertake inspection and maintenance in accordance with the strategy.
- 6.7.8 Following the initial feedback from the Council's Drainage Engineer, the applicant produced a further Technical Note (Ref: TN001) which provides additional details in respect the Thames Water consent, storage calculations for each catchment area and details of the Hydro-brake/Oriface details proposed for the scheme.
- 6.7.9 The Council's Drainage Engineer has reviewed the additional information provided in the Technical Note and the updated drainage plan. The applicant has confirmed that there is no permeable paving proposed within the scheme. Areas of bio-retention have been included within the highway verges to provide an additional surface SuDS feature and water quality and amenity benefits. The location of the bio-retention areas is shown on the Proposed Surface Water Drainage Strategy drawing, ref. 39048/2001/002, and construction details on drawing 39048/2001/021.
- 6.7.10 However, the Council's Drainage Engineer has confirmed that the details submitted do not still address the points raised in their first representations. Accordingly, the Drainage Engineer has recommended the standard conditions to be attached to any permission granted. Officers, are seeking further clarification from the Drainage Engineer on what exactly is outstanding in terms of the above condition and whether the application of the standard condition is warranted. Officers will report the outcome via the addendum.

## 6.8 Trees and Ecology

### 6.8.1 Condition 9 requires:

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

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

- 6.8.2 The applicant has submitted a biodiversity protection and enhancement strategy in respect of the above condition. In summary, with respect to part a) of the above condition the proposed biodiversity enhancements will include the provision of bird boxes and bat roosts and log piles. The proposed strategy has been reviewed by the Council's Biodiversity Officer, who has commented that the bat boxes, of which at least half should be built into the fabric of the new buildings, offering appropriate roosting and breeding opportunities. Under BAP Action 3d, not only should developments '*incorporate nesting and/or roosting sites for relevant species of birds and/or bats*' but **preference should always be given to 'built-in' features such as roosting bricks, bat tubes and bat bricks**. Accordingly at least half of the bat roosting/breeding opportunities for each building should be built-in offering equivalent scope/capacity for roosting and/or breeding.
- 6.8.3 Similar to bats, there is a presumption that nest boxes should be built in wherever possible. There should again be 12 swift boxes and a mix of 25 woodcrete, tit, robin, sparrow and starling boxes rather than the 20 wooden boxes proposed. As the strategy notes woodcrete boxes have a long life and it is proposed that the suggested wooden boxes be replaced with a mix of Schwegler boxes an/or built in designs designed for tits, robins, starlings and house sparrow giving a total of 25+ nesting locations. The peregrine box is to be welcomed. Although woodcrete boxes have a higher initial cost, maintenance costs would be reduced.
- 6.8.4 Invertebrate shelter boxes may have some benefits for certain species and are to be encouraged on that basis. Creation of 'sand banks' or sandy spaces (with sand mixed with a very low proportion of cement), in suitably sunny locations, would suit other species for invertebrates and the appropriate management of vegetation and arising (shrubby debris, cut timber and deadwood etc., and green composting on site) would have added benefits and should be incorporated within a detailed management plan
- 6.8.5 In terms of part b) of the proposed condition, the strategy sets out a number of initiatives for habitat creation on the site. Green roofs are proposed, which are considered acceptable. The Biodiversity Officer considers that the seed mixes are fine. However, preference would be for a reduced amount of grasses (and/or yellow rattle seed) than in ER1F, and inclusion of cornfield flower mix seed (SC2) within what is proposed. The plans should help to enhance the site but should go further than they do at present.
- 6.8.6 The climbing plants proposals are to be welcomed in principle However, further information should be provided about the proposed 'trellis system'. What form will this take? What will be its extent? What biomass of climbers will be supported? The information is somewhat unclear referring in parts to climbers on bare walls – and then around trees. More definite details about what is proposed are required.
- 6.8.7 In reference to part c) of the above condition, the Council's Biodiversity Officer has advised that if bat and bird boxes and other aspects of the site are to be monitored, the resulting records should be shared with the local environmental

records centre, Greenspace Information for Greater London, as well as with the iRecord network via the Consultants Portal. This should be conditioned as a requirement for its own sake but will also provide a means for LBH to evaluate compliance

- 6.8.8 In view of the above recommendations, whilst the overall biodiversity protection and enhancement strategy provides an overview of the proposed biodiversity strategy for this site, it is considered necessary to condition the detailed enhancements in line with the recommendations above.
- 6.8.9 Condition 18 requires  
*Applications for approval of Reserved Matters for each relevant phase submitted pursuant to this permission shall be accompanied by a detailed Arboricultural Report for that phase. This document shall explain how the trees outlined in purple on the Application Plan HV(00)AP003 (20.03.2012) are to be retained, together with measures for their protection during the course of the development. If any trees outlined in purple on the Application Plan HV(00)AP003 (20.03.2012) are to be removed, lopped or topped, a full justification must be provided within the Arboricultural Report. This document shall also explain the total numbers of trees to be removed, together with details of proposed replacement tree planting, to ensure an overall increase in the number of trees across the site.*
- 6.8.10 The proposal seeks to remove all the trees along the frontage of the site, of which 29 trees are subject to a TPO (No.875). The arboricultural report states that the trees in question are considered to be of a low, Category C, and therefore not considered to make a lasting contribution to the landscape character of the site. During pre-application discussion in relation to this site, Officers accepted the removal of these trees in principle as it was considered that in order to create an active frontage and to interface the development within the wider landscape the removal of the trees would be justified in this case. Furthermore, the loss of these trees would be offset by the enhanced landscaped proposal for the site which would include extensive tree planting to not just the open spaces, but along key public realm routes along Headstone Drive and the primary road. For the purposes of the above condition, the submitted details are satisfactory and therefore the details can be approved.
- 6.8.11 It is noted that under the landscape strategy, there is one tree located adjacent to the north-western boundary that could possibly be retained. Although, this tree is located outside of the site boundary. Notwithstanding this, a standard tree protection fencing condition is recommended.

## 6.9 Accessibility

- 6.9.1 Policy AAP4 of the AAP, policy DM2 of the DMP and policy 3.8(c) of the London Plan relating to Housing Choice, requires 90% of homes should meet building regulations M4 (2) – ‘accessible and adopted dwellings’. Policy 3.8(d) will require 10% of new housing to meet building regulations M4 (3) – ‘wheelchair user dwellings’. Furthermore, The London Plan policy 7.2 requires



all future development to meet the highest standards of accessibility and inclusion.

6.9.2 Condition 14 requires:

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

*(a) how the proposed public realm areas would be accessible to all, including details of finished site levels, surface gradients and lighting;*

*(b) how each non-residential building would be accessible to all, including details of level access and internal accommodation arrangements;*

*(c) that each of the residential dwellings would comply with Lifetime Homes standards, with 10% Wheelchair Homes compliance.*

6.9.3 As discussed elsewhere in this appraisal, the site levels plans submitted with this application only provide an overview of the proposed site levels. Insufficient details have been provided with respect to actual surface gradients to a suitable scale. Furthermore detailed cross-section details would be required. In terms of lighting further information is also required.

6.9.4 In respect of part b) above, whilst it is noted that the applicant would not be the end user of the non-residential buildings, details for level threshold would form part of the design build of the development. No information has been submitted in regard to level access for the non-residential parts of the buildings on this site.

6.9.5 With respect to part c), the applicant's UDR confirms under the inclusive access section that at a minimum all homes would meet Part M4(2) of the Building Regulations and at least 10% of the homes would be wheelchair adaptable to meet the requirements of Part M4(3). The applicant has stated that the affordable rented wheelchair units would be fully fitted for wheelchair user. In this regard part c) of the above condition has been met.

6.9.6 As parts a) and b) have not been met, it is necessary to attach this condition again.

6.10 Sustainability

6.10.1 London Plan Policy 5.2 (Minimising Carbon Dioxide Emissions) requires new development to minimise carbon emissions in accordance with the energy hierarchy of be lean (use less energy), be clean (supply energy efficiently) and be green (use renewable energy). The policy sets targets for carbon emission reductions, with a 40% reduction required relative to the 2010 Building Regulations for both residential and non-residential development (this is equivalent to a 35% reduction over the more recent 2013 Building Regulations). The policy outlines the requirements for energy statements and indicates that the carbon reduction targets should be met on-site.

- 6.10.2 Policy 5.5 (Decentralised Energy Networks) requires developers to prioritise connection to existing or planned decentralised energy networks where feasible, with Policy 5.6 (Decentralised Energy in Development Proposals) requiring the evaluation of the feasibility of Combined Heat and Power (CHP) systems in new developments and where such a system is appropriate, the examination of opportunities to extend the system beyond the boundary to adjacent sites. The policy also requires development to prioritise connection to existing heating and cooling networks, followed by a site wide CHP network, and lastly communal heating and cooling.
- 6.10.3 Policy 5.7 (Renewable Energy) requires new development to provide a reduction in expected carbon emissions through on-site renewable energy, where feasible. The supporting text to the policy indicates there is a presumption that the reduction achieved through on-site renewable energy will be at least 20%.
- 6.10.4 Harrow Local Plan policy largely cross-refers to the London Plan requirements with respect to carbon emissions [see Core Strategy Policy CS1 (T), Policies DM12 Sustainable Design and Layout, DM13 Decentralised Energy, and DM14 Renewable Energy Technology]. Within the Harrow and Wealdstone AAP, Policy AAP4 (Achieving a High Standard of Development throughout the Heart of Harrow) also cross-refers to the London Plan. Policy AAP10 (Harrow and Wealdstone District Energy Network) recognises that the nature and scale of development envisaged within the AAP area is likely to be conducive to the establishment of a district energy network and requires all new development to prioritise connection to existing or planned decentralised energy networks, where feasible. Where such a network is not feasible at present, development proposals should ensure the design of the development would facilitate connection in the future. Furthermore, the policy requires that all new major development includes on-site heating and cooling networks linking all buildings on-site and prioritising CHP where applicable and served by a single energy centre. The policy establishes a hierarchy for the selection of heating and cooling systems, as follows: connection to existing CCHP/CHP distribution networks; site-wide CCHP/CHP powered by renewable energy; gas-fired CCHP/CHP or hydrogen fuel cells, both accompanied by renewables; communal heating and cooling fuelled by renewable sources of energy; and finally, gas fired communal heating and cooling.
- 6.10.5 Condition 8 requires:  
*Applications for approval of Reserved Matters for each relevant phase submitted pursuant to this permission relating to layout, scale and appearance shall be accompanied by a detailed Energy Strategy for that phase. The Energy Strategy shall explain:*
- (a) how the proposed building design(s) realise(s) opportunities to include design and technology energy efficiency measures;*
  - (b) the reduction in carbon emissions achieved through these building design and technology energy efficiency measures, compared with the emissions permitted under the national Building Regulations prevailing at the time the application(s) for approval of Reserved Matters are submitted;*
  - (c) how energy shall be supplied to the building(s), highlighting;*

*i. how the building(s) relate(s) to the site-wide strategy for district heating incorporating tri-generation from distributed combined heat and power; and*

*ii. any other measures to incorporate renewables.*

*(d) how the building(s) have been designed to achieve at least the minimum requirement under BREEAM (or an equivalent assessment method and rating) prevailing at the time the application(s) for approval of Reserved Matters are submitted.*

*An energy strategy is only required to be submitted and approved once per phase.*

- 6.10.6 The submitted energy statement states that the overall measures that are to be implemented would achieve a 35% improvement over Part L 2013, which would accord with London Plan policy stated above. However the outline energy statement demonstrates that it would not be feasible to achieve the 20% renewables target. The report highlights that reduction in carbon emission through building fabric is more cost effective than renewables.
- 6.10.7 Officers acknowledge that there is no mandatory requirement for renewables. Building fabric and low carbon solutions should always be prioritised before renewables.
- 6.10.8 The proposed development would incorporate energy efficiency measures, which include insulated building fabric with low air permeability, glazing with suitable U-value and daylight transmission, mechanical ventilation with heat recovery and low energy lighting. For non-domestic buildings, initial shell construction would include insulated building fabric with low air permeability and glazing with suitable U-value, g-value and daylight transmittance. Further fit out works would include further energy efficiency measures.
- 6.10.9 The proposal would include a CHP to power the site. This would see a further reduction 25.9% CO<sub>2</sub> reduction.
- 6.10.10 In terms of renewable energy, Photovoltaics would be proposed where feasible at roof level. The development would achieve a further 19% reduction in CO<sub>2</sub> emissions. Other renewable technologies have been discussed in the energy report; however these were found to be unsuitable for this site. The overall combined energy efficiency measure (including renewables) would achieve an improvement of 35% over the baseline.
- 6.10.11 In respect of the non-domestic building, London Plan policy 5.2 requires development for the period of 2016-2019 to achieve as per what is required under building regulations. During pre-application discussions, with the applicant it was agreed that no specific targets would be set for BREEAM compliance. The applicant has provided a sustainability statement in line with the BREEAM structure so show hoe the site provides sustainable buildings at the site.
- 6.10.12 Based on the above, Officers consider that the energy and sustainability statement submitted in respect of the above condition can be approved. It is

noted that the energy statement does make reference to submission of details pursuant to condition 29 attached to the outline permission. However, for the purposes of this application, only details submitted in respect of condition 8 have been considered.

## 6.11 Housing Mix

- 6.11.1 London Plan policy 3.8 and policy AAP13 of the AAP require new development to provide a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups.
- 6.11.2 Condition 11 requires:  
*Applications for approval of Reserved Matters for each relevant phase submitted pursuant to this permission relating to layout, scale and appearance (excluding where housing is not proposed) shall be accompanied by a detailed Housing Schedule for that phase. This document shall explain:*
- (a) the type and mix of units proposed;*
  - (b) whether the units are to be provided as affordable or not and if so what tenure;*
  - (c) the gross internal floor areas of each dwelling; and*
  - (d) the number, mix and tenure of all residential units known at the time of submission of the reserved matter.*
- 6.11.3 The applicant has provided a schedule of the type, mix, tenure and floor areas of units to be proposed across the site, which includes, 1 bed(2 person), 2 bed(3 and 4 person) and 3 bed(5 and 6 person) units. The applicant has set out that of the 650 units 140 (21.5%) units would be affordable housing which would include a mix of flats and houses. Of these, 84 will be for affordable rent and 56 for shared ownership, providing a tenure split of 60% affordable rent and 40% shared ownership. The applicant has provided the GIA for each unit type which has been considered to be acceptable in terms of the national space standards. The homes for affordable rent will be located around Core 2 and 3 of Block A5, whilst the shared ownership homes will be located on the first to eight floor in the northern section of Block A1 (Block A1-C).
- 6.11.4 The scheme would deliver 244 one bedroom flats, 300 two bedroom flats and 85 three bedroom flats. In addition the scheme would include 4 two bedroom maisonettes and 17 three bedroom maisonettes.
- 6.11.5 The proposed unit mix is considered to be acceptable and in accordance with the above stated policy. The level of affordable housing was agreed through the outline permission, and the current proposals are in accordance with that agreed level of provision.

## **7.0 CONCLUSION AND REASONS FOR APPROVAL**

- 7.1 The proposals would not give rise to any unreasonable impact upon the amenities of any neighbouring occupiers and will provide satisfactory living accommodation for potential occupiers. It is considered that the external appearance, scale, layout, access and landscaping scheme submitted is acceptable and it is recommended that the application is approved.
- 7.2 The decision to grant planning permission has been taken having regard to the National Planning Policy Framework (2012), the policies of The London Plan (2016), Harrow's Core Strategy (2012), the policies of the Harrow and Wealdstone Area Action Plan (2013) and the policies of the Harrow Development Management Policies Local Plan (2013) listed in the informatives below, as well as to all relevant material considerations including the responses to consultation.

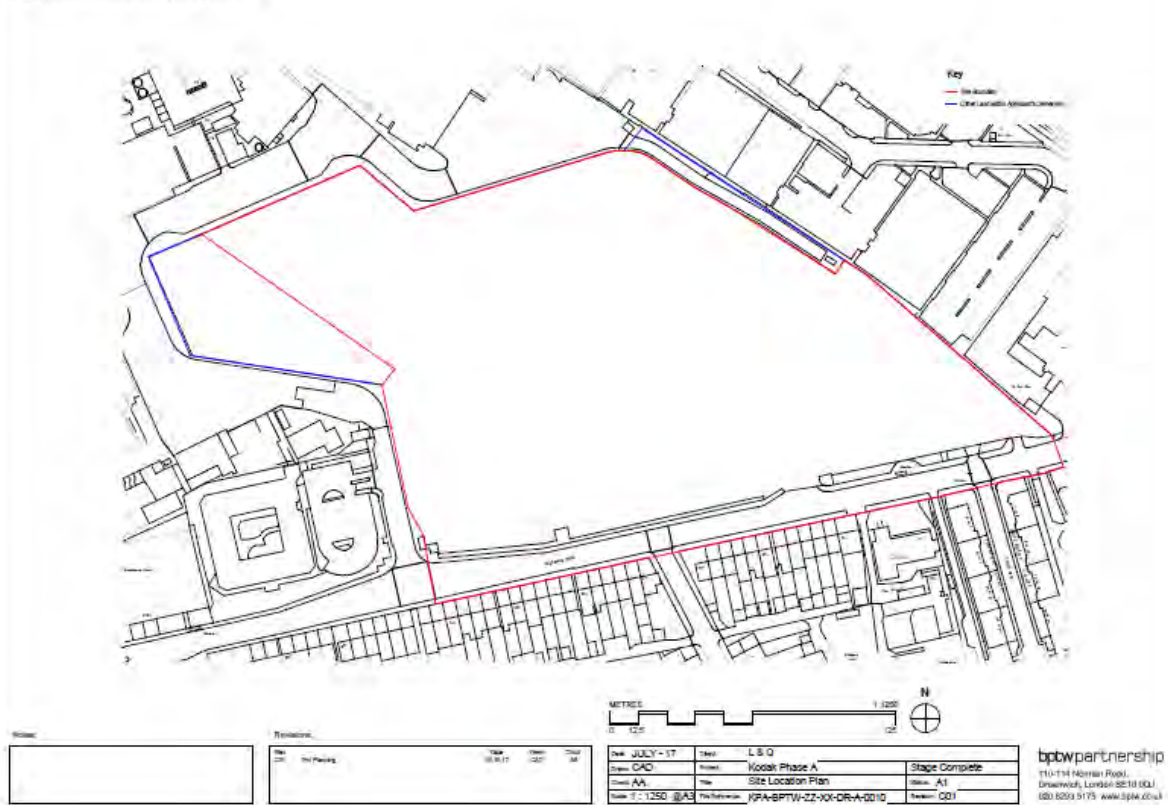
## **APPENDIX 1: Conditions and Informatives**

### **Conditions**

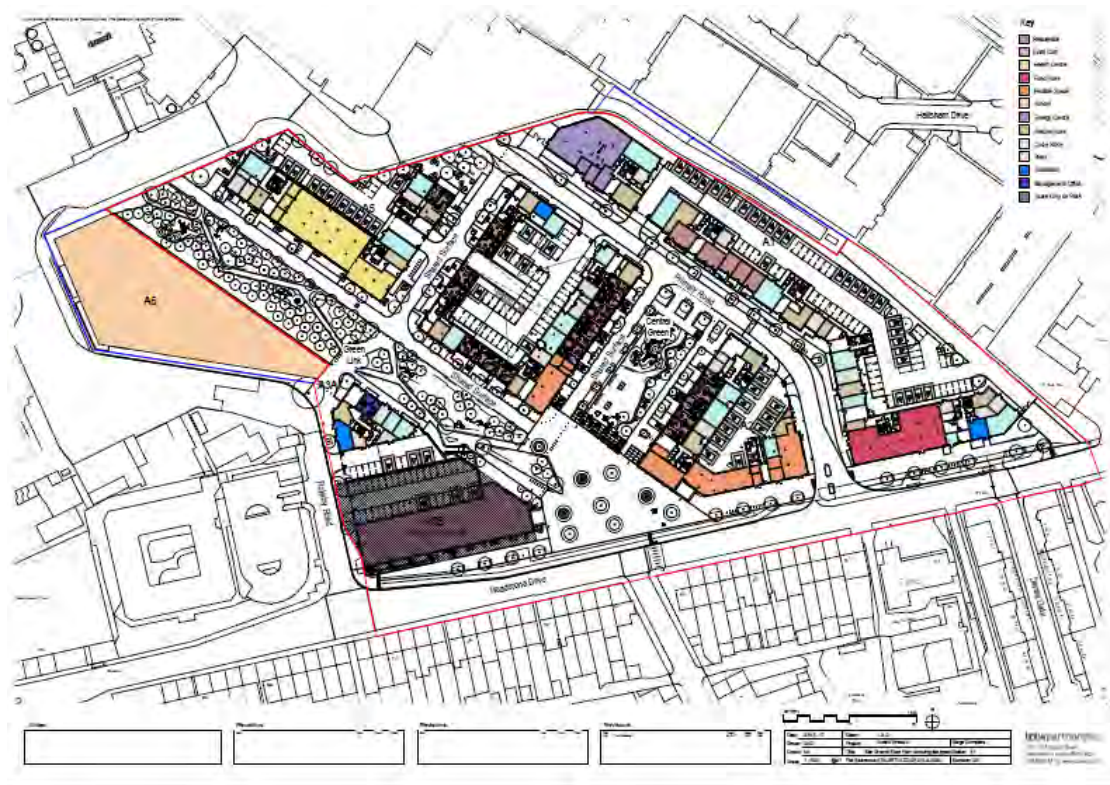
To be reported via the addendum.

# APPENDIX 2: SITE PLAN

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## APPENDIX 2: PLANS AND ELEVATIONS



Site context layout



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