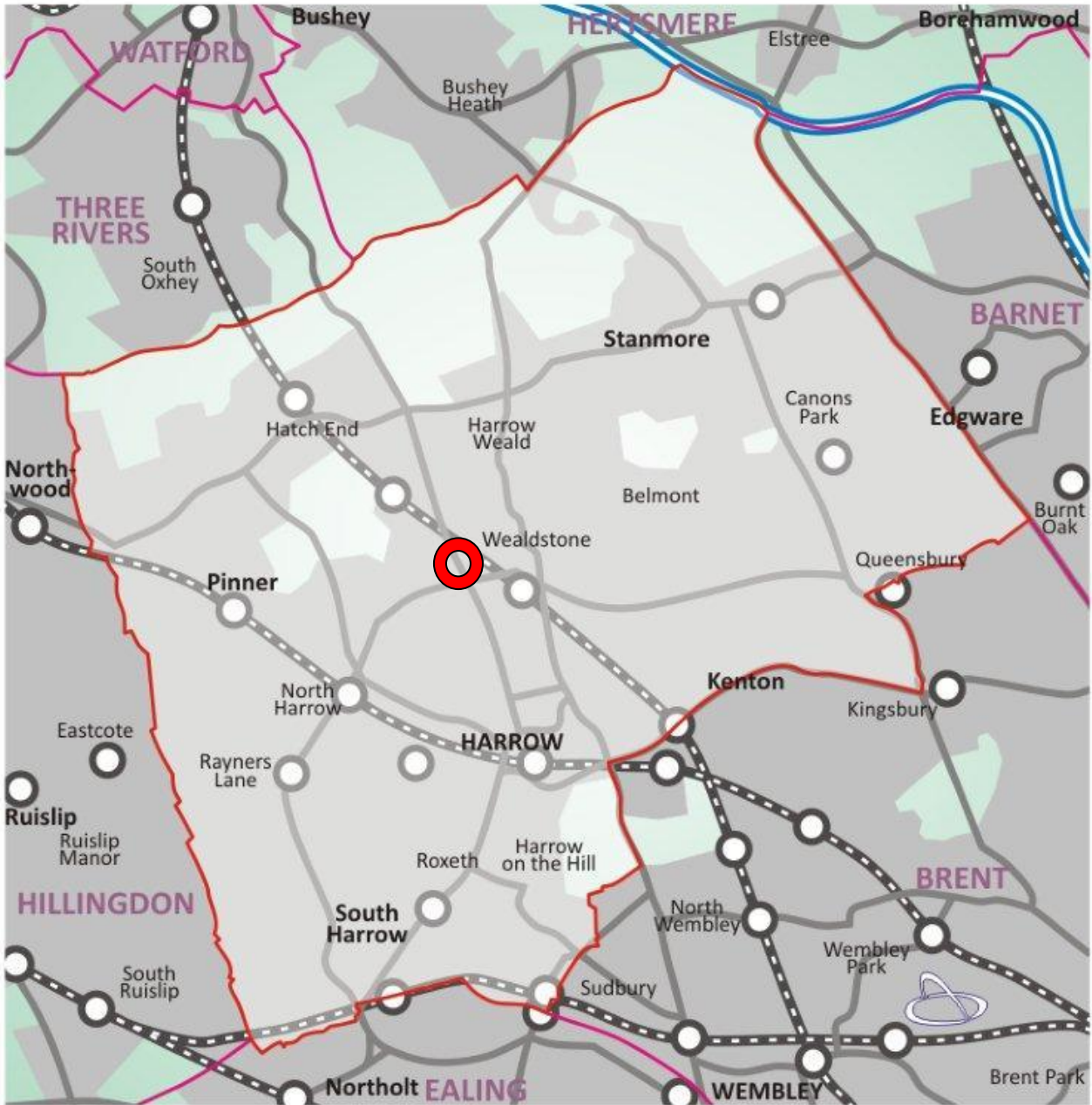
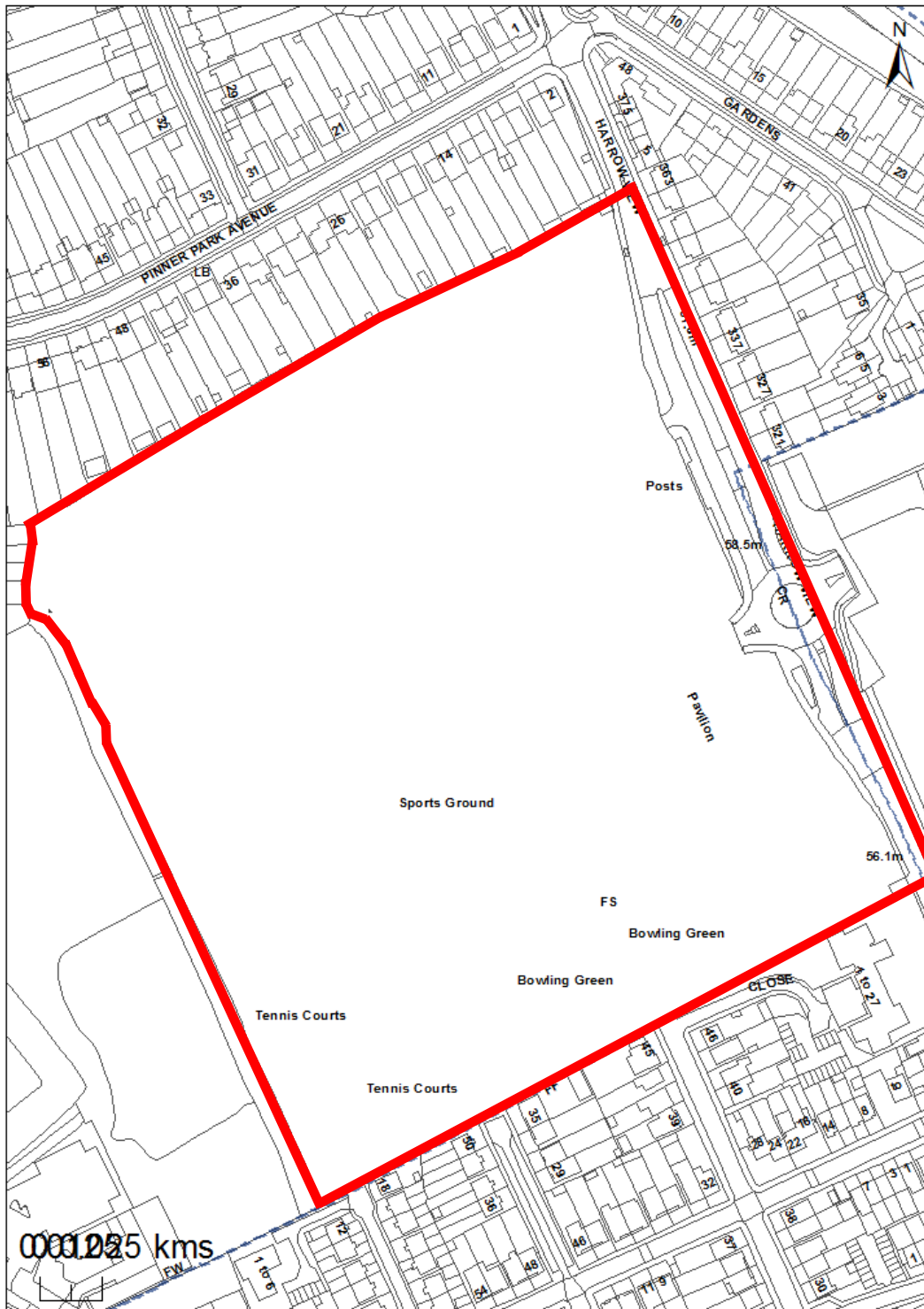


 = application site



Harrow View West (Former Zoom Leisure Sports Ground/Kodak), Harrow View	P/4037/16
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Harrow View West (Former Zoom Leisure Sports Ground/Kodak), Harrow View	P/4037/16
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LONDON BOROUGH OF HARROW

PLANNING COMMITTEE

24TH JANUARY 2018

APPLICATION NUMBER: P/4037/16
VALIDATE DATE: 30/09/16
LOCATION: KODAK SPORTS GROUND AND PAVILION,
HARROW VIEW (HARROW VIEW WEST)
WARD: HEADSTONE NORTH
POSTCODE: HA2 6QQ
APPLICANT: PERSIMMON HOMES NORTH LONDON
AGENT: ICENI PROJECTS LIMITED
CASE OFFICER: JUSTINE MAHANGA

PURPOSE OF REPORT/PROPOSAL

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

Development to provide 425 residential dwellings (Use Class C3); associated car parking; cycle parking; refuse storage; landscaping; electrical substation; open space and associated works.

(This application is accompanied by an EIA.)

RECOMMENDATION A

The Planning Committee is asked to:

1. agree the reasons for approval as set out in this report, and
2. refer this application to the Mayor of London (the GLA) as a Stage 2 referral; and
3. subject to the Mayor of London (or delegated authorised officer) advising that he is content to allow the Council to determine the case itself, or to issue a direction under Article 7 that he does not wish to direct refusal, or to issue a direction under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application, delegate authority to the Divisional Director of Regeneration, Enterprise and Planning in consultation with the Director of Legal and Governance Services for the completion of the Section 106 legal agreement and other enabling development and issue of the planning permission and subject to minor amendments to the conditions (set out in Appendix 1 of this report) or the legal agreement. The Section 106 Agreement Heads of Terms would cover the following matters:

Affordable Housing and Wheelchair Homes

- A minimum of 108 homes on the wider Harrow View West site to be provided as affordable homes in accordance with a schedule of accommodation (to include details of tenure, mix and rent levels) to be approved in writing by the Council prior to the commencement of the development. The schedule of accommodation must identify potential locations for additional affordable units, in the event that a supplement is required following the review.
- No more than 75% of the private rented units shall be occupied until 66 affordable rent units and 42 shared ownership units have been completed.
- A late stage review mechanism (75% sales) to enable the financial viability of the development to be re-appraised at an appropriate time point (or points) during the course of the development to enable any additional affordable homes to be provided on-site, in the first instance.
- 10% of affordable rented homes to be constructed as wheelchair homes (Part M4(3)(2)(b) and be ready immediately upon completion for occupation by a wheelchair user

Employment and Training

- An additional financial contribution of £40,980 to be paid by the developer to fund economic development within the Borough. This contribution is in addition to £50,460 previously secured. A total sum of £91,440 is therefore required.
- An additional financial contribution of £77,860 to be paid by the developer to fund local employment and training programmes. This contribution is in addition to £95,874.00 previously secured. A total sum of £173,734 is therefore required.
- The developer to use all reasonable endeavours to secure the use of local suppliers and apprentices during the construction of the development.

Design Review and Design Code

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

Decentralised Energy Networks

- The developer to use all reasonable endeavours to ensure that the on-site energy centre is laid out with sufficient space to allow expansion and technical feasibility of CHP scheme to also serve any future redevelopment of the AAP site 2 (the site

allocation in the adopted Local Plan) currently known as Kodak and Zoom Leisure and other adjacent development sites

- The developer to safeguard a route to be agreed with the Council to allow expansion and technical feasibility of the CHP scheme to also serve any future redevelopment of the AAP site 2 (the site allocation in the adopted Local Plan) currently known as Kodak and Zoom Leisure, and to enable a connection to any future district decentralised energy network
- In the event of any proposed future district decentralised energy network, the developer to use all reasonable endeavours to agree terms pursuant to a connection between the site-wide heat network and the district decentralised energy network. A route within the scheme shall be safeguarded to enable future connection of the site-wide network to any district decentralised energy network.

Transport and Highways

- Bus service improvements – A £400,000 contribution is required to TFL to facilitate a new bus service along Harrow View. This contribution is in addition to £75,000 that has been paid to TFL for bus service improvements associated with the extant consent.
- An additional financial contribution of £25,000 to be paid by the developer towards the Council's cycling hub.
- The developer to make space available on the site to accommodate two parking spaces for a car club vehicle. The developer to make reasonable endeavours throughout the life of the development to secure a car club operator to provide a vehicle for those spaces.
- A travel plan bond of £38,180 will be required to ensure the effective implementation, monitoring and management of the travel plan for the site. This contribution is in addition to £16,820 travel plan remedial sum that is outstanding for the outline consent. A total travel plan remedial sum of £55,000 is therefore required.
- A £5,000 travel plan monitoring contribution is required.

Public Realm

- The green link and area of open space to be designated and retained in perpetuity as public open space.
- Pedestrian and cycle access from the site through to Headstone Manor Recreation Ground must be maintained and open to the public at all times.
- The developer to provide an Open Space Management Plan to the Council for approval, relating to the green link and public open space.

Legal Costs, Administration and Monitoring

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

RECOMMENDATION B

That if the Section 106 Agreement is not completed by 24 July 2018, or as such extended period as may be agreed by the Divisional Director of Regeneration, Enterprise and Planning in consultation with the Chair of the Planning Committee, then it is recommended to delegate the decision to REFUSE planning permission to the Divisional Director of Regeneration, Enterprise and Planning on the grounds that:

The proposed development, in the absence of a Legal Agreement to provide appropriate improvements, benefits and monitoring that directly relate to the development, would fail to adequately mitigate the impact of the development on the wider area and provide for necessary social, environmental and physical infrastructural improvements arising directly from the development, contrary to the National Planning Policy Framework (2012), policies 3.11, 3.13, 5.6, 5.12, 6.3, 7.4, 7.5, 7.6 and 7.7 of The London Plan (2016), Core Strategy (2012) policy CS1, policies DM 1, DM 2, DM 9, DM 13, DM 28, DM 42, DM 43 and DM 50 of the Harrow Development Management Polices Local Plan, policies AAP3, AAP4, AAP9, AAP10, AAP13, AAP15, AAP19 and AAP20 of the Harrow and Wealdstone Area Action Plan (2013) and the Supplementary Planning Document: Planning Obligations (2013).

SUMMARY AND REASON FOR THE RECOMMENDATIONS

Following the submission of the reserved matters application P/2982/15, which approved 314 residential units at the application site, material planning circumstances have emerged to justify an intensified residential density at the application site. Specifically, following the 2015 consolidation of the alterations to the London Plan, the designation of the Heart of Harrow changed from that of an Intensification Area to an Opportunity Area. The London Plan states that 'Opportunity Areas are the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvement of public transport accessibility' (par 2.58). In addition to this, in February 2015, the Mayor announced London's first 9 Housing Zones, of which the London Borough of Harrow was a successful bidder. The entire Heart of Harrow Opportunity Area is now designated as a Housing Zone.

In response to the re-designation of the Heart of Harrow (Harrow and Wealdstone Intensification Area) as an Opportunity Area (London Plan 2015) and as one the Mayor's Housing Zones, the applicant is seeking full planning permission for the intensified residential development over part of the site (included within the red line site boundary). The wider Harrow View West site would provide 569 dwellings, representing an uplift of 255 from the reserved matters consent.

The concerns of residents, amenity associations and neighbouring interests regarding the proposed development are all acknowledged. The Council also sympathises with the surrounding residents in regards to the extended time frame of the application process. Whilst the following appraisal identifies impacts of the proposed development on the surrounding area and local infrastructure, it is considered that such impacts are inevitable if necessary growth is to be delivered within one of London's opportunity areas. Furthermore, whilst the assessment identifies areas requiring further consideration or additional detailed information, it is considered that on balance, the following reasons for approval justify the grant of planning permission:

- The wider Harrow View Site would add to the supply of contemporary dwelling houses and purpose-built flats across the market for private sale, shared ownership and affordable rented tenures. In response to demographic and market trends and the needs of different groups, the proposed dwellings would range in size from one bedroom studio flats to larger family sized dwellings. All of the proposed units would provide an acceptable standard of accommodation and 10% of all units would be wheelchair adaptable. Overall, it is considered that the current proposal would make a valuable contribution towards the delivery of target housing outputs including affordable housing units for the Heart of Harrow Opportunity Area, a designated Housing Zone. The proposed residential offer would promote housing choice and make a positive contribution to the creation of inclusive and mixed communities in this area of Harrow.
- The proposed high quality public realm would provide a unique setting for the future residential development and would create opportunities for social interaction that would enhance the sense of community within the wider area. Whilst there is currently no through access from Harrow View to Headstone Manor, the proposed green link would provide a new pedestrian and cycle connection from Harrow View through to Headstone Manor grounds. In addition to the green link, the proposed development would provide new spaces and places for the public, in the form of a large area of open space and pocket parks; with formal and informal play equipment. A multi-use game area is also proposed on the edge of the green. All areas of public realm and the access to Headstone Manor would remain open for use by the public. Accordingly, the proposed development would provide enhanced benefits to the local community through improved connectivity and the provision of open space.
- The proposal would deliver a scheme that would greatly assist towards the regeneration of Wealdstone District Centre, which is known to be currently under-performing. It is considered that the proposal will provide a much needed physical renewal of the site which would strengthen connectivity within Wealdstone and would positively relate to the adjoining Headstone Manor Ground. It is anticipated that the mere fact of redevelopment would improve perceptions of the district centre and confidence in the strength of the local economy. It is envisaged that the proposal will therefore assist to improve economic performance and quality of life in this locality, helping Wealdstone to achieve its full potential.

A comprehensive assessment of the potential impacts on surrounding amenity has been undertaken. The findings of this assessment acknowledged that the proposal would bring about a significant change in outlook for neighbouring occupiers. However,

in the context of the previous approval, the site allocation and the designation of the site, the resulting outlook is not considered to be unreasonable. It is considered on balance that subject to a comprehensive schedule of planning obligations and planning conditions relating to design and materiality, that the proposal would not detrimentally impact upon the amenity of neighbouring occupiers.

Subject to the planning conditions and s106 obligations, in particular the contribution towards a new bus service, it is considered that the transport impacts of the proposal are acceptable and in this regard, the proposal would comply with the aims and objectives of the Development Plan.

The environmental information and a range of potential environmental impacts have been assessed in accordance with regulation 3 of the EIA Regulations. The application shows that the proposal would incorporate measures that would help to adapt to/manage the impacts of climate change and identify areas where mitigations are required, including those needed to secure adequate living conditions for future occupiers and to safeguard the environment of surrounding occupiers during demolition and construction phases. These mitigations would be secured through a range of recommended conditions of planning permission. Infrastructure made necessary by the development is incorporated within the proposed Heads of Terms of a Planning Obligation to be entered into under section 106 of the Town and Country Planning Act. Contributions to general infrastructure requirements would be made under Harrow's Community Infrastructure Levy.

For these reasons and weighing up the development plan policies and proposals for material consideration, it is recommended that planning permission is granted, subject to completion of a planning obligation under section 106 of the Town and Country Planning Act 1990 (as amended) and the subject to the conditions set out in Appendix 1 of this report.

INFORMATION

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

Statutory Return Type:	Largescale Major Development
Council Interest:	None
GLA Community Infrastructure Levy (CIL) Contribution (provisional):	£1,348,515
Local CIL requirement:	£3,889,409

HUMAN RIGHTS ACT

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

EQUALITIES

In determining this planning application the Council has regard to its equalities

obligations including its obligations under section 149 of the Equality Act 2010.

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

S17 CRIME & DISORDER ACT

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

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

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

LIST OF ENCLOSURES / APPENDICES:

Officer Report:

Part 1: Planning Application Fact Sheet

Part 2: Officer Assessment

Appendix 1 – Conditions and Informatives

OFFICER REPORT

PART 1: Planning Application Fact Sheet

The Site	
Address	Kodak Sports Ground and Pavilion, Harrow View
Applicant	Persimmon Homes North London
Ward	Headstone
Local Plan allocation	Allocated Site 2- Kodak and Zoom Leisure
Conservation Area	No
Listed Building	No
Setting of Listed Building	Yes. Headstone Manor- Grade I Listed
Building of Local Interest	No
Tree Preservation Order	No
Other	No

Housing		
Density	Proposed Density within application boundary u/ph	120
	Proposed Site Wide Density u/ph	72
	PTAL	2
	London Plan Density Range	Urban: 70-170
Dwelling Mix	Studio / 1 bed (no. / %)	72 (16.9%)
	2 bed (no. / %)	328 (77.2%)
	3 bed (no. / %)	25 (5.9%)
	4 bed (no. / %)	nil
	Overall % of Affordable Housing	108 (19%) wider Harrow View West site
	Affordable Rent (no. / %)	66 (61%)
	Intermediate (no. / %)	42 (39%)
	Private (no. / %)	80%
	Comply with London Housing SPG?	Yes
	Comply with London Housing SPG?	Yes
	Comply with M4(2) of Building Regulations?	To be secured by condition

Non-residential Uses		
Existing Use(s)	Existing Use / Operator	Part residential
	Existing Use Class(es) sqm	Class C3
Proposed Use(s)	Proposed Use / Operator	Residential
	Proposed Use Class(es) sqm	Class C3
Employment	Existing number of jobs	N/A
	Proposed number of jobs	N/A

Transportation		
Car parking	No. Existing Car Parking spaces	n/a
	No. Proposed Car Parking spaces	257 (application site) 441 (wider Harrow View West site)
	Proposed Parking Ratio	0.61 (application site) 0.78 (wider Harrow View West site)
Cycle Parking	No. Existing Cycle Parking spaces	n/a
	No. Proposed Cycle Parking spaces	1069
	Cycle Parking Ratio	2.5 per dwelling
Public Transport	PTAL Rating	1 / 2
	Closest Rail Station / Distance (m)	Harrow and Wealdstone
	Bus Routes	H14
Parking Controls	Controlled Parking Zone?	No
	CPZ Hours	N/A
	Previous CPZ Consultation (if not in a CPZ)	N/A
	Other on-street controls	N/A
Refuse/Recycling Collection	Summary of proposed refuse/recycling strategy	Included within body of report

PART 2: Assessment

1.0 SITE DESCRIPTION

The Kodak Masterplan Site

- 1.1 In 2012 outline planning permission P/3405/11, granted approval for a masterplan at the 'Kodak Site'. The application site comprised the Kodak Industrial Factory site and the former Sports Ground and Pavilion, known as Zoom Leisure.
- 1.2 The Kodak industrial site, known as Harrow View East, has a total area of 16.65 hectares and is located to the east of Harrow View and to the north of Headstone Drive. The site is a designated Strategic Industrial Location in the London Plan (2016). The operational land is occupied by a range of industrial, logistical and administrative officer 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.
- 1.3 The former Kodak Sports Ground and Pavilion (Zoom Leisure), known as Harrow View West, has a total area of 7.9 hectares and is located on the western side of Harrow View. At the time of the outline application, the Zoom Leisure site comprised indoor and outdoor sports facilities, including playing fields, tennis courts, bowls greens and indoor sports and leisure facilities, with associated hard surfaced parking areas.
- 1.4 The following image demonstrates the extent of the Kodak Masterplan Site, and the sub-areas of Harrow View West and Harrow View East.
- 1.5 This application relates to Harrow View West.

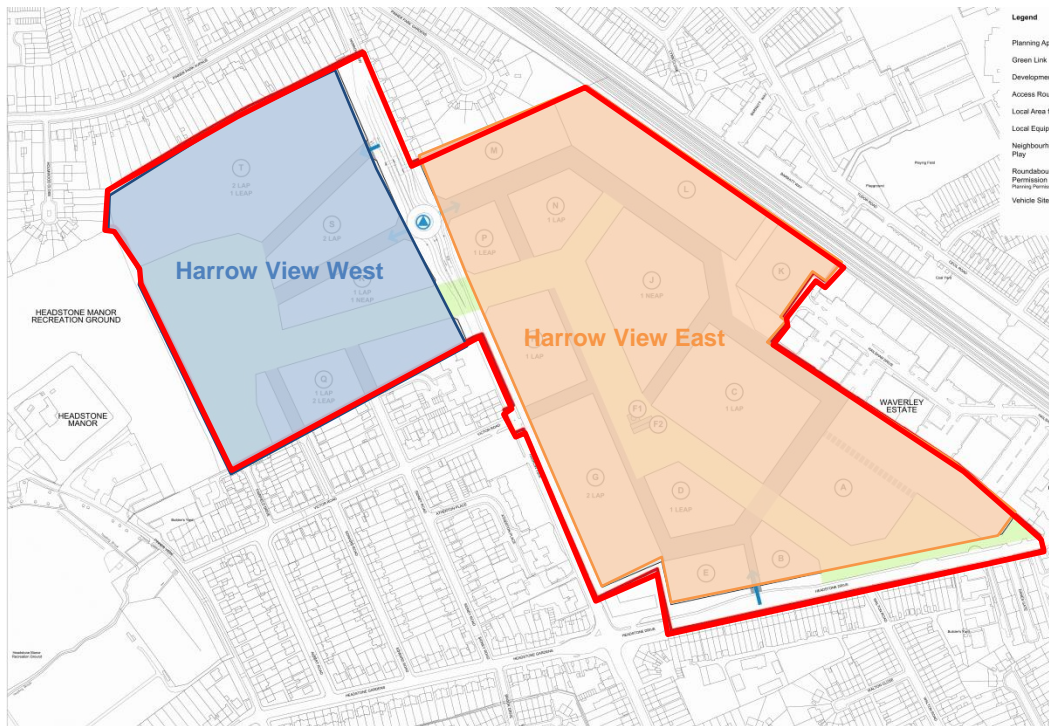


Figure 1: Approved Kodak Masterplan site – P/3405/11

Harrow View West, the former Kodak Sports Ground and Pavilion

- 1.6 The 7.9 hectare Harrow View West site is located within the Harrow and Wealdstone Opportunity Area, and is an allocated site in the Harrow and Wealdstone Area Action Plan (AAP site 2).
- 1.7 The site has been cleared of all structures and facilities associated with the former Kodak Sports Ground and Pavilion (Zoom Leisure). Construction of planning approval P/2982/15 for 314 new homes commenced in October 2016 at the northern end of the site.
- 1.8 A topographical survey of the site indicates that the site falls downhill from east to west from around 62.3 AOD in the north eastern corner of the site on Harrow View, to around 51.9 AOD in the site's southwestern corner.
- 1.9 The western part of the site is a designated flood plain (Flood Zones 2-3b), whilst the remainder of the site is in Flood Zone 1.
- 1.10 The site benefits from two existing vehicle accesses from Harrow View. A further pedestrian access (via a locked gate) exists between the site and Headstone Recreation Ground.
- 1.11 The site has a Public Transport Accessibility Level (PTAL) of Level 2.

The application site (outlined in red)

- 1.12 The site which is subject to the current planning application comprises a 3.8 hectare area of land (outlined in red) located within the wider Harrow View West site (outlined in blue).



Figure 2: Harrow View West (red site outline)

- 1.13 The areas excluded from the red line (approximately 4.1 hectares) will be developed in accordance with the reserved matters consent (P/2982/15), granted in June 2015 (referred to herein as RM Consent). Specifically, the areas excluded from the current application include:
- Northern parcel of the site: 126 residential units (including 10 affordable units), comprising: 56 x two-bedroom houses, 38 x three-bedroom houses and 32 x four bedroom houses. Construction and occupation of this phase has commenced;
 - Southern parcel of the site: 18 residential units, comprising: 2 x two-bedroom houses, 12 x three-bedroom houses and 4 x four-bedroom houses; and,
 - In addition to this, the approved area of open space and green link (27,170sqm), provided in accordance with the parameter plan of outline permission P/3405/11, have been excluded from the application boundary. Whilst the landscape strategy for these areas would be revised to reflect the higher density, no changes are proposed to the scale or siting.

Description of Immediate Locality and Local Highway Network

- 1.14 The site is separated from the Kodak factory site to the east, by Harrow View (A4008), which carries traffic from the north towards Harrow Town Centre.
- 1.15 To the south are suburban residential areas comprising predominantly single and two storey semi-detached and terraced housing, as well as taller flatted developments fronting Harrow View (between three to four storeys in height).
- 1.16 To the west of the site is Headstone Manor Recreation Ground, which is designated Metropolitan Open Land in the local plan and is occupied by Headstone Manor, a Grade I listed moated building with Grade II listed outbuildings. The Manor is used as a heritage and cultural centre. The Manor complex is also a designated Scheduled Ancient Monument.
- 1.17 To the north of the site is suburban residential development on Pinner Park Gardens, Pinner Park Avenue and Holmwood Close, comprising predominantly two storey semi-detached housing.
- 1.18 Headstone Lane station is located approximately 1.0km to the north-west and is served by London Overground services.
- 1.19 Harrow and Wealdstone Station is located approximately 1.4km to the south-east of the site and is served by London Underground, London Overground and National Rail Services, as well as additional bus serviced running along Station Road.
- 1.20 The H14 bus runs north-south along Harrow View, between Hatch End and Harrow Town Centre, and then on to Northwick Park Hospital.

- 1.21 The H9 and H10 buses run east-west along Headstone Drive in circular routes, the H9 linking up to Harrow Town Centre with Northwick Park Hospital and Kenton, whilst the H10 links up Harrow Town Centre with South Harrow and Rayners Lane.

2.0 PROPOSAL

- 2.1 As referenced within the description of the subject site, whilst this planning application refers to land at Harrow View West (the former Kodak sports ground and pavilion) (outlined in blue on Figure 2), the subject planning application relates only to 3.8 hectares of the wider site, outlined in red (Figure 2). The remainder of the site is currently under construction in accordance with Reserved Matters Consent P/2982/15 (referred to herewith as RM consent).

Headline Proposals:

- 2.2 Full planning permission is sought for the intensification of the approved residential development included within the redline boundary. Specifically, whilst RM Consent granted permission for 170 residential units within this redline boundary, the proposal seeks approval for 425 residential units, representing an uplift of 255 units within the red outline.
- 2.3 The proposed development would provide 425 residential units (use class C3), comprising studios, one, two and three-bedroom flats and 4 x 2bedroom houses. In total, the proposed development would provide 27,858 sq m of residential floorspace (GIA).
- 2.4 The application site measures 3.54 hectares. As such, the residential density of the proposed development equates to 120 dwellings per hectare (d/ph).
- 2.5 The proposed flats would be provided within 24 purpose-built apartment buildings, ranging in height from 3 to 6 storeys (between 7.4 and 19.6 metres). The majority of the apartment blocks extend to 4 storeys, with the exception of Blocks A, J, K, M, R and S which in part extend to 6 storeys in height. Block H/4 is the only element of the proposed development that comprises 3 storey development.
- 2.6 The previously approved green link, running from east to west from Harrow View and the area of open space located adjacent to Headstone Manor, would be retained within the current proposal. Accordingly, these areas have been excluded from the redline site boundary.
- 2.7 A Combined Heat and Power System (CHP) would be located within Block S which is located on the Harrow View frontage, to the east of the site. Provision has been made for a 113.22sqm space.

Site Layout and Heights of Proposed Buildings

2.8 The proposed 24 purpose-built apartment buildings would follow two distinct typologies; linear mansion blocks (16) and villas (8) and would be arranged as follows:

- Blocks S and J (linear building typology) would be situated along the eastern boundary, with a north-south orientation along Harrow View;
- Behind these blocks, a further 5 linear blocks (L, M, K, R, T) are proposed in the form of a courtyard layout arrangements, with dwellings looking onto a central, semi-private amenity space. A minimum separation distance of 18m would be provided between the internal elevations of these blocks. With the exception of Blocks, L and M which include a frontage to the green link, the courtyard buildings have been designed to address the urban areas of the site;
- Blocks N, O, Z (linear blocks) would be located centrally within the application site and generally follow a north-south orientation.
- Block A would follow an 'L-shape' typology with a frontage to Harrow View West and the green link.
- Blocks B, C, D, and E (linear blocks) are also designed to address the green link which runs east to west through the site.
- Block H (linear block) is located to the south of the green link blocks and has been designed to respond to the sensitive location adjacent to the approved housing and neighbouring properties.
- The green link leads to into a large area of open space, located adjacent to Headstone Manor Recreation Grounds. 8 villa blocks (G, F, P, Q, U, V, W, X) have been arranged around the perimeter of this space.

2.9 A detailed breakdown of each of the proposed buildings, including the proposed heights, is provided in Table 1.0.

Table 1: Breakdown of Proposed Blocks

Block	Tenure	Proposed units	Building Type / Location	Height
Block A	Private Market Sale	27 units: 26 x 2b 3 p 1 x 2b 4p	L shaped linear block, fronting Harrow View and the Green Link Wheelchair units provided	4 / 6 storeys
Block B	Private Market Sale	8 units: 1 x 1b 1p 4 x 2b 3p 3 x 2b 4p	Linear block fronting the green link	4 storeys

Block C	Private Market Sale	8 units: 1 x 1b 1p 4 x 2b 3p 3 x 2b 4p	Linear block fronting the green link	4 storeys
Block D	Private Market Sale	15 units: 6 x 1b 1p 1 x 1b 2p 8 x 2b 3p	Linear block fronting the green link	4 storeys
Block E	Private Market Sale	8 units: 1 x 1b 1p 4 x 2b 3p 3 x 2b 4p	Linear block fronting the green link	4 storeys
Block F	Private Market Sale	16 units: 1 x 1b 2p 4 x 2b 3p 11 x 2b 4p	Villa block (square) on edge of green space	4 storeys
Block G	Private Market Sale	16 units: 1 x 1b 1 p 4 x 2b 3p 11 x 2b 4p	Villa block (square) on edge of green space	4 storeys
Block H	Private Market Sale	14 units: 5 x 1b 1p 2 x 1b 2 p 7 x 2b 3p	Linear block located adjacent to the southern boundary (north to south) Wheelchair units provided	3 / 4 storeys
Block J	Affordable Housing	37 units: 31 x 2b 4 p 6 x 3b 5p	Linear block fronting Harrow View	4 / 6 storeys
Block K	Private Market Sale	21 units: 3 x 1b 1p 2 x 1b 2p 15 x 2b 3p 1 x 2b 4p	Linear block fronting internal road Wheelchair units provided	4 / 6 storeys
Block L	Affordable Housing	12 units: 1 x 2b 3p 11 x 2b 4p	Linear block fronting green link	4 storeys
Block M	Private Market Sale	23 units: 6 x 1b 1p 1 x 1b 2p 7 x 2b 3p 9 x 2b 4p	L shape Linear block fronting green link and internal road Wheelchair units provided	4 / 6 storeys
Block N	Private Market Sale	19 units: 3 x 1b 1p 7 x 2b 3 p 8 x 2b 3 p 1 x 2b 4p	L shape linear block fronting an internal road and the green link Wheelchair units provided	4 storeys
Block O	Private Market Sale	15 units: 11 x 2b 3 p 4 x 2b 4 p	Linear block fronting internal road	4 storeys
Block P	Private Market	11 units: 3 x 1b 2 p	L shape villa	4 storeys

	Sale	3 x 2b 3p 5 x 2b 4p		
Block Q	Private Market Sale	11 units: 3 x 1b 2p 3 x 2b 3p 5 x 2b4p	L shape villa	4 storeys
Block R	Private Market Sale	25 units: 8 x 1b 1p 2 x 1b 2p 10x 2b 3p 5 x 2b 4p	Linear block Wheelchair units provided	4 / 6 storeys
Block S	Affordable Housing	48 units: 8 x 1b 2p 25 x 2b 4 p 15 x 3b 5p	Linear block fronting Harrow View Wheelchair units provided	4 / 6 storeys
Block T	Private Market Sale	27 units: 3 x 1b 1p 1 x 1b 2p 14 x 2b 3p 9 x 2b 4p	Linear block fronting internal road	4 storeys
Block U	Private Market Sale	16 units: 1 x 1b 1 p 4x 2b3p 11 x 2b 4p	Square villa	4 storeys
Block V	Private Market Sale	11 units: 3 x 1b 2p 3 x 2b3p 5 x 2b 4p	L shape villa	4 storeys
Block W	Private Market Sale	11 units: 3 x 1b2p 3 x 2b 3p 5 x 2b4p	L shape villa	4 storeys
Block X	Private Market Sale	11 units: 3 x 1b2p 3 x 2b 3p 5 x 2b4p	L shape villa	4 storeys
Block Z	Part private part shared ownership	11 units: 3 x 2b3p 4 x 2b4p 4 x 3b 5p	L shape linear block	4 storeys

Proposed Residential Use

- 2.10 Of the 425 proposed residential units, 72 (16.9%) would be one-bedroom flats, 328 (77.2%) would be two-bedroom flats and 25 (5.9%) would be 3-bedroom flats.
- 2.11 Of the 425 residential units, 327 (76.9%) would be private ownership dwellings, and 98 (23.1%) would be affordable units.

- 2.12 49 (11.5%) Wheelchair User Dwellings (Part M4(3)) are proposed within Blocks A, H, J, M, N, R and S.
- 2.13 Each block would be served by a primary and secondary entrance (front and rear elevations) to a lobby, stair and lift core. The lift would serve every floor. All ground floor units would be accessed via private entrances and would not include direct internal access to the building.
- 2.14 Each of the dwellings is proposed with its own form or private amenity space. In most cases this is in the form of a private balcony, however for the ground floor dwellings this comprises private terraces and patios.
- 2.15 Refuse, recycling and bicycle storage for each building would be provided internally on the ground floor. Access to these areas would be provided externally, via the front and rear elevations.
- 2.16 A further detailed breakdown of the proposal's housing offer is provided in 'Housing and Residential Quality' (section 6.4).

Parking, Access and Servicing

- 2.17 Vehicle access to the site is proposed via the two existing access points on Harrow View. There are no vehicular access points proposed along the southern, western or northern site boundaries.
- 2.18 The proposal would provide a sequence of new courtyards and streets, all of which would be accessed from Harrow View.
- 2.19 A shared surface (previously approved within RM Consent P/2982/15) would run parallel to the southern side of the green link.
- 2.20 257 car parking spaces are proposed within the proposed development in the form of courtyard car parking and on-street car parking. This results in a car parking ratio of 0.61 within the application site boundary.
- 2.21 1069 cycle spaces would be provided in safe and secure storage areas on the ground floor of each residential block, representing a ratio of 2.5 spaces per dwelling.
- 2.22 Refuse and recycling for each block would be provided within internal bin stores located at ground floor.

Cumulative development of wider Harrow View West site:

- 2.23 Table 1.2 below provides an overview of the proposed residential mix across the wider Harrow View West site. This includes the 144 dwellings being delivered in accordance with RM Consent (blue line) and the proposed dwellings proposed within the subject planning submission (red line).

Table 2:

Unit size	No. units	Percentage mix
1 bedroom	72	12.7%
2 bedroom	386	67.8%
3 bedroom	75	13.2%
4 bedroom	36	6.3%
Total:	569	100%

- 2.24 As detailed within the above table, the wider Harrow View West site would deliver 569 residential dwellings, of which 20% are proposed as houses and 80% as apartments.
- 2.25 The total area of the wider Harrow View West site is 7.9ha, resulting in an overall density of 72 dwellings/ha.
- 2.26 In total, 108 affordable dwellings are proposed across the wider site, equating to 19% affordable housing provision. This offer comprises 10 affordable dwellings within the first phase of the RM consent (7 x 3B5P and 3 x 4B60) and 98 units within the proposed development.
- 2.27 Of the 108 affordable homes, 61% would be affordable rent and 39% shared ownership.
- 2.28 A cumulative provision of 441 parking spaces would be provided across the wider Harrow View West site to serve the 567 residential dwellings. This equates to a ratio of 0.78 parking spaces per dwelling.
- 2.29 The proposed areas of public and shared open space within the development site equates to 28,100sqm, a 35.5% proportion of the site.

Phasing

- 2.30 The applicant has providing phasing plan 15.101.107, demonstrating the construction phasing of the proposed development. Phase 1 and 2 is currently under construction and partly occupied. The proposed development and the southern parcel of the RM consent would be constructed in a further 6 phases. Notwithstanding the phasing of the development, given the requirement to assess the proposal on a site wide basis, any conditions of approval would relate to the overall approved development and would not be required by phases.

Revisions to Application Following Submission

- 2.31 Following initial consultation of the proposed development in October 2016, various concerns were raised by internal and external consultees and surrounding residents. These concerns are discussed within section 4 of this report.

2.32 In addition to this, two Design Review Panels were held on 21st November 2016 and 20th March 2017. These panels consisted of two external architects. Various concerns were raised in regards to the design, massing and appearance of the original proposal, which have been summarised in section 6.6.

2.33 In response to these concerns, the applicant and Local Planning Authority entered into an intensive programme to redesign the proposal to overcome the initial objections.

2.34 The primary amendments can be summarised as follows:

Character, Massing, Layout and Design:

- Revised building layout: Blocks B, C, D, F, H, J, Q, R, S have been broken down into smaller blocks, with reduced frontages. The total number of blocks has been increased from 17 to 24;
- Edge to Green Space: The large buildings fronting the green space have been replaced with smaller buildings which follow a 'villa' typology;
- Variation in building heights and roof form across the site: whilst the original submission was entirely 4 storey with flat roofs, building heights now range from 3-6 storeys. A pitched roof design has also been incorporated to some blocks;
- Refinement and variation in the appearance of blocks;
- Relocation of CHP.

Landscaping:

- Revised landscaping layout for the green link and open space;
- Additional recreation area between block P and Q;

Transport and Highways:

- Refuse and recycling stored internally, within secure and accessible space at ground floor of each building;
- Increase in the number of car parking spaces from 243 (ratio of 0.52) to 257 (ratio of 0.61);

Housing Provision:

- The number of residential units has been reduced from 464 to 425;
- Provision of affordable units has increased from 13.13%-18.65% to 19% (site wide);

Technical:

- The red line boundary has been amended to exclude the approved area of open space and green link;
- Addition of CGI drawings and detailed elevations;

- Addition of a Secure by Design Statement, Wireline Assessment, Housing Statement, Phasing plan;
- Updated Technical Report; and,
- Revised Environmental Impact Statement.

2.35 EIA Development

2.36 The proposed development is considered an 'EIA development' as it falls within the description and thresholds in Schedule 2 10(b) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 as an 'urban development project' which has the potential to have significant effects on the environment.

2.37 Regulation 3 of the EIA Regulations prohibits granting planning permission unless prior to doing so, the relevant planning authority has first taken the 'environmental information' into consideration, and stated in their decision that they have done so.

2.38 The 'environmental information' comprises the applicant's Environmental Statement, including any further information and any other information, and any representations received from consultation bodies or duly made by any person about the environmental effects of the development.

2.39 An EIA Scoping Report was submitted to LBH in July 2016 to seek a formal Scoping Opinion. The EIA Scoping Report included a description of the proposed development and was accompanied by a location plan of the site and a list of the cumulative schemes to be assessed within the ES.

2.40 A formal EIA Scoping Opinion was issued on 18th August 2016 and the ES was informed by this document.

Environmental Information

2.41 An Environmental Statement (ES) was submitted by the applicant with the planning application in September 2016.

2.42 The applicant provided a revised ES in December 2017, reflecting the significant revisions which have been undertaken to the proposal since initial submission. This revised document also includes further information requested by the LPA.

2.43 The revised ES Addendum was submitted in December 2017 and was advertised as 'further information'.

2.44 The final version of the ES assessed the effects on the following environmental receptors (in the order they appear in the ES):

- Chapter 1 Introduction
- Chapter 2 EIA Structure and Methodology
- Chapter 3 Alternatives and Design Evolution
- Chapter 4 The Proposed Development Description

- Chapter 5 The Development Programme and Construction
- Chapter 6 Planning Policy Context
- Chapter 7 Air Quality
- Chapter 8 Heritage and Conservation
- Chapter 9 Noise and Vibration
- Chapter 10 Highways and Transport
- Chapter 11 Ecology and Open Space
- Chapter 12 Energy and Sustainability
- Chapter 13 Flood and Surface Water
- Chapter 14 Waste
- Chapter 15 Daylight, Sunlight and Overshadowing
- Summary of Residual and Cumulative Overshadowing

2.45 Representations from a number of consultation bodies including the Environment Agency, English Heritage and Natural England have been received, as well as representations from local residents about the environmental effects of the development.

2.46 The ES, revised ES, other relevant documentation submitted with the planning application, clarification information, consultee responses, representations duly made by any other persons constitute the 'environmental information', which has been taken into account when writing this recommendation and is required to be taken into account when assessing this planning application.

2.47 Officers are satisfied that this represents the environmental information for the purposes of Regulation 3.

Likely Significant Effects

2.48 The ES, publicly available on the planning file, identify any likely significant environmental effects (adverse and beneficial) from the construction phase (including demolition and other associated site preparation activities) and operation of the proposed development, before and after mitigation. Officers have had full regard to the content of the Environmental Statement in the preparation of this report. The significance of the likely effects has been determined from the sensitivity of the receptor and the magnitude of the change. Where the ES identifies harm that requires mitigation, appropriate planning conditions would be added to the permission and legal agreement. Any changes to effects assessed are addressed by requirements under the EIA regulations relating to subsequent applications.

2.49 Where adverse effects have been identified, appropriate mitigation measures have been proposed. Mitigation measures will be secured by way of planning conditions and/or planning obligations as appropriate.

3.0 RELEVANT PLANNING HISTORY

3.1 A summary of the relevant planning application history is set out below.

3.2 Kodak Masterplan (Harrow View East and Harrow View West):

Ref no.	Description	Status and date of decision
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)	Granted - 21/12/2012
P/0873/14	Minor material amendment to the outline planning permission P/3405/11 for the comprehensive, phased, mixed use development of land at Harrow View and Headstone Drive. Relocate the primary school (up to 3,630sqm) from development zone P to development zone A (in Phase 1) and to relocate the leisure use (up to 1,155 sqm) and community centre (up to 1,562 sqm) from development zone A to development zone P (in phase 2). Interim energy centre to be located within Zone A to supply Phase 1.	Granted - 23/12/2014
P/2182/15	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)	Approved – 09/12/2015

3.3 Harrow View East:

Ref no.	Description	Status and date of decision
P/2165/15	Outline planning application (all matters reserved) for a comprehensive, phased, mixed use development of land at Harrow	Granted – 09/12/2015

	View and Headstone Drive (known as Harrow View East), as set out in the Development	
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3.4 Harrow View West (application site):

Ref no.	Description	Status and date of decision
P/2982/15	Approval of all reserved matters for Phase 1B only (land west of Harrow View - formerly Zoom leisure sports grounds)	Approved: 26/10/2015
P/4262/16	Non-material amendment to planning permission p/2982/15 dated 26/10/15 to allow the relocation of the northern access by 900mm	Granted: 05/10/2016
P/4632/16	Single storey building to house electrical substation (retrospective).	Granted: 25/11/16
P/5230/16	Non-material amendment to planning permission p/2982/15 dated 26/10/15 to allow the installation of canopies to house type B and F	Granted: 16/12/16
P/0581/16 P/1456/16 P/2964/16 P/2966/16 P/3000/16 P/1469/16 P/4189/16	Various applications approving details associated with P/2982/15.	2016-2017
P/1789/17	Non-material amendment to planning permission p/2982/15 dated 26/10/15 to allow minor internal and external alterations to the approved buildings; installation of a retaining wall along the northern boundary and variation to the approved housing mix within P/2982/15	Granted: 17 May 2017

Pre-application discussions

- 3.5 In February 2015, the entire Heart of Harrow Opportunity Area was designated as a GLA Housing Zone. The Mayor's London Housing Strategy (2014) indicated that Housing Zones would help boost housing supply in London, in recognition of the projected population growth anticipated during the plan period. It was envisaged that the Heart of Harrow Housing Zone would help unlock the potential to deliver more than 5,000 new homes over the next ten years
- 3.6 In response to this, Persimmon Homes North London (the applicant) entered into discussions with the Local Planning Authority (LPA) regarding an intensified scheme at the application site. Whilst the site had an extant permission to provide 314 residential units, in light of the housing zone designation, the LPA considered that the site could successfully accommodate a higher density residential development.
- 3.7 In January 2016 the applicant entered into a formal Planning Performance Agreement (PPA) with the LPA, with the aspirations of bringing forward an intensified scheme. During these pre-application discussions, the principle of providing a higher density residential development through the provision of apartment blocks was accepted. Initial discussions regarding the layout of the site and the scale and massing of the buildings were also undertaken. No worked-up elevations or details regarding the proposed housing mix or provision of affordable housing were provided at this stage.
- 3.8 A full planning application for the intensified residential development was validated by the LPA on 30 September 2016. Consultation of this proposal took place during October 2016.
- 3.9 Following the consultation period, numerous concerns were raised by surrounding residents and external consultees. The LPA and relevant internal departments also raised objections to aspects of the proposal. A Design Review Panel was held on 21 November to directly feedback on the proposed design. These concerns are discussed within section 4.0 of this report.
- 3.10 In response to these concerns, the applicant and Local Planning Authority entered into an intensive 3 month PPA programme to respond to initial objections. The following aspects of the proposal were reviewed in detail:
- Architectural rationale;
 - Scale and Massing;
 - Provision of Housing, including affordable homes; and,
 - Impact on the highways and public transport network.
- 3.11 Accordingly, the revised scheme that is before the LPA has been brought forward following in-depth discussions and preparations between both parties, which included presenting the scheme to the Council's Major Development Panel, Design Review Panels and Public Stakeholder Consultation.

4.0 **CONSULTATION**

1st Consultation

- 4.1 5 Site Notices were erected on 7th October 2016, expiring on 31st October 2016.
- 4.2 Press Notices were advertised in the Harrow Times and Harrow Observer on the 6th October 2016, expiring on 30th October 2016.
- 4.3 The application was advertised as the following:
A Major Planning Application;
Planning Permission Accompanied by an EIA; and,
Setting of a Listed Building.
- 4.4 A total of 1733 consultation letters were sent to neighbouring properties on 3rd October 2016 regarding this application. 70 objections were received.
- 4.5 A summary of the responses received along with the Officer comments are set out below:

Summary of Comments	Officer Comments
<p><u>Overdevelopment of the site:</u></p> <ul style="list-style-type: none">• The proposal would result in overpopulation and overcrowding in Wealdstone.• Harrow does not have the facilities to accommodate the proposed density• Additional infrastructure is required to support the new occupiers – schools, hospitals etc	<p>An assessment of the proposed density is included in section 6.4</p>
<p><u>Traffic and Highways</u></p> <ul style="list-style-type: none">• Surrounding roads are extremely busy, parking will be limited and residents will spill over onto surrounding roads;• The submitted Transport assessment is unacceptable• The proposal includes inadequate parking, which will cause an overflow onto surrounding streets;• The H14 bus is already at capacity. The proposal will require a huge increase in bus frequency.• The proposal would result in further congestion on roads.	<p>The proposal was revised following the initial consultation period. A revised Transport Assessment and Travel was prepared.</p>

<ul style="list-style-type: none"> • Local roads will not cope with the additional traffic (North into Harrow, South into Hatch End, Harrow View) • The increase in cars will result in rat-running • The traffic report doesn't include a fatality which occurs near the side entrance to the site • It is likely that the cul-de-sacs on surrounding roads will likely need to be opened • The site access proposals are not acceptable and would lead to a safety hazard 	
<p><u>Design, Massing, scale, height</u></p> <ul style="list-style-type: none"> • Failure to respect local context and planning policy; • The proposal is out of keeping with the area, which is mainly houses; • Not in keeping with low rise character of surrounding area; • Proposal plans look like an estate, no play space for children; • Flats and apartments are out of character with the surrounding area. • The blocks are unattractive, within the setting of a heritage asset • The development is visually out of character with the housing stock type in the entire adjoining area- visually unsympathetic to existing housing stock; 	<p>The proposal was revised following initial consultation period. Revised plans were prepared.</p>
<p><u>Amenity</u></p> <ul style="list-style-type: none"> • The proposal would result in a loss of light to Fairfield Drive and rear gardens; • Loss of privacy and light to neighbouring properties; • Noise disturbance • Local pollution- dust from construction; health concerns regarding construction; • Fly tipping may become an issue; • Rubbish management; • Noise disturbance from construction. • Boundary fence is poor quality and does not offer sufficient protection to adjoining residents. 	<p>The proposal was revised following initial consultation period. An updated Daylight / Sunlight assessment was prepared.</p>

<p><u>Housing provision:</u></p> <ul style="list-style-type: none"> • There is no mention of affordable housing; • Houses should be affordable to rent, not simply affordable for property market. • No details regarding the split between private and social housing; • Housing mix – lack of family dwellings; • Prices are not affordable; • There is a need for family housing within Wealdstone. 	<p>The proposal was revised following initial consultation period. The applicant was asked to provide further details relating to the provision of affordable housing.</p>
<p><u>Environmental</u></p> <ul style="list-style-type: none"> • Loss of green space may lead to flooding; • Losing more green spaces would adversely affect the character of Harrow; • The proposal spoils the park facility; • The benefit of the additional housing does not outweigh the detrimental effect of loss of loss of greenspace • The proposal would result in air pollution 	<p>The proposal was revised following initial consultation period. Chapters of the Environmental Statement were revised.</p>

2nd Consultation

- 4.6 Additional consultation was undertaken following significant amendments to the proposed development. These amendments have been detailed in the 'proposal' section of this report.
- 4.7 5 Site Notices were erected on 12th September 2017, expiring on 4th October 2017.
- 4.8 The application was advertised as the following:
A Major Planning Application;
Planning Permission Accompanied by an EIA; and,
Setting of a Listed Building.
- 4.9 A total of 1733 consultation letters were sent to neighbouring properties on 14th September 2017 regarding this application.
- 4.10 One letter of support was received indicating that the provision of smaller flats better addresses the housing crisis.
- 4.11 One letter of objection was from Gareth Thomas MP on behalf of several of his constituents. This letter raised concerns regarding the impacts of the development on the immediate vicinity, including increased traffic and pressures on parking, pollution and noise from construction works, loss of amenity and loss of open space. Further concerns were raised in terms of the loss of amenity on surrounding residents and the impact on infrastructure.

4.12 79 letters of objection were received from members of the public.

4.13 Given the scale of the amendments to the proposal, a summary of the objections received along with the Officer comments are set out below:

Summary of Comments	Officer Comments
<p><u>Overdevelopment of the site / pressure on infrastructure:</u></p> <ul style="list-style-type: none"> • Original permission for 314 dwellings was an acceptable density for the site; • The local schools (ref to Pinner Park Primary), dentists and GP's are already at capacity; • The development would create unprecedented demand on local services such as education and healthcare; • Too many dwellings with no extra provision for health care or education; • Northwick Park hospital A&E is at breaking point; • The provision of flats will have a detrimental impact on the local area and on the Manor House in Headstone Manor Park; • The site looks overcrowded; • The surrounding area does not need any more development, there is already the approved development and the Kodak site; • The surrounding areas is overcrowded and is suffering from a strain on public services; • The quality of life for local residents has to take precedence over more housing; • The sewers will not be able to cope with increased density; • More houses reduced the standard of living for current residents; • A new schools and hospital are vital to support the proposal and this cannot wait for the development to come forward on Harrow View East; 	<p>The concerns raised are discussed within the proceeding sections of this report.</p>

<p><u>Traffic, Highways & Servicing</u></p> <ul style="list-style-type: none"> • Proposal would increase traffic in the area; • Buses H14, H9, H10 are already overcrowded at peak times; • Insufficient parking within the development will result in an overspill of parking on surrounding streets; • Local roads will become too congested; • Courtney Avenue is already congested during rush hour, the proposal will exacerbate this; • Side roads will be used as rat-runs; • The crossing at Headstone Gardens and Harrow View is dangerous; • Extra demands on council services like refuse collection; • St George Junction overcrowded; • Pinner Park Avenue is already used as a cut-through from Headstone Lane and the new development is likely to lead to considerably more traffic; • The road surrounding the site were not built to accommodate such an increase in vehicles; • Bus services can not cope with additional demand; • Proposal will lead to an increase in road rage; • Takes 6-8 minutes to get from Pinner Park Avenue to the Goodwill Lights due to traffic congestion; • Congestion around Quadrant traffic lights; • The applicant has incorrectly stated the 'peak hours' within their transport assessment; • Metropolitan service from Harrow on the Hill and Midlands Service from Harrow and Wealdstone are packed at peak-times; • Round-about on Harrow View is dangerous and has already caused one fatality; 	<p>Issues relating to traffic, highways and servicing are assessed within sections 6.9 of this report.</p>
<p><u>Design, Massing, scale, height</u></p> <ul style="list-style-type: none"> • The established buildings on the site are ugly and do not match the original plans; • The sloping flat roofs of the existing buildings look terrible and are not in keeping with the character of the surrounding area; • Blocks of plans would be out of character with the surrounding area; • Not in keeping with the area; • Unattractive houses and flats; • The development has already ruined views of the parkland within the area; 	<p>Issues relating to design, massing and height are assessed within sections 6.6 of this report.</p>

<ul style="list-style-type: none"> • The proposal indicates that little thought has been paid to design; • Object to layout of buildings; • Proposed buildings are too high and would be out of character; • Existing buildings look like an industrial site; • The design resembles barracks with no imagination; • Houses and flats have no architectural character; 	
<p><u>Landscaping / Green Space</u></p> <ul style="list-style-type: none"> • The proposal should include more green space. • A better playground would be of more use in this area; • A line of poplar trees has already been sacrificed for the development; • There is no space for children to play; • 	<p>A detailed assessment of the landscaping and open space is included within section 6.9 of this report.</p>
<p><u>Heritage Impacts:</u></p> <ul style="list-style-type: none"> • Visual impact on Manor House; • Over-shadowing of Headstone Manor; • Blocks would obscure the view of Harrow-on-the Hill; • Proposed green space does not make-up for the loss of two playing fields; 	<p>Issues relating to the impacts on headstone Manor are assessed within sections 6.8 of this report.</p>
<p><u>Amenity</u></p> <ul style="list-style-type: none"> • Loss of privacy from overlooking; • The provision of light has already been reduced by the existing buildings on the site; • No gardens for children to play; • Loss of light for residents of Pinner Park Avenue, Fairfield Drive, Edward Road, Sidney Road and Downing Close. 	<p>Issues relating to amenity are assessed within section 6.5 of this report.</p>
<p><u>Land Use/ Housing provision:</u></p> <ul style="list-style-type: none"> • Density keeps on going up but affordable housing, s106 contributions and town centre support keep on going down; • Loss of family homes; • Too many flats being introduced to the area; • No reference to affordable housing; • Poor housing mix; • Not mixed use. The master plan indicated that there would be mixed-use across both Kodak sites. • The housing need of the area is 3 and 4 bedroom houses; • The development should include shops; • Houses are bought by wealthy buy-to-let investors, thereby not allowing true first time buyers. 	<p>Issues relating to housing provision are assessed within section 6.4 of this report.</p>

<p><u>Environmental</u></p> <ul style="list-style-type: none"> • The air pollution in the area is already high during rush hour, the proposal would exacerbate this; • Drainage for local houses and flats; • The removal of grass and soil has caused flooding; • Noise and disturbance in the area due to overdevelopment; • Council are not doing enough for rubbish collection and street cleaning; • Rat infestation in the area; • Increased litter; • Lack of public bins / rubbish management; • The development would cause more run-off water which would run into the Headstone Manor Moat; • Air pollution is worse since the development; 	<p>Environmental impacts of the proposal are discussed in section 6.11.</p>
<p><u>Socio-economic:</u></p> <ul style="list-style-type: none"> • The blocks of flats would increase crime rates and anti-social behaviour; • Crime and anti-social behaviour is on the increase; • Pollution and fly-tipping; 	<p>Secured by Design accreditation would be required by way of a planning condition. This is discussed in section 6.7.</p>
<p><u>Consultation / Process of Planning Application:</u></p> <ul style="list-style-type: none"> • Developers have failed to listen to the concerns of local residents; • Local residents have not be listened to on this issue, as they have been ignored so far; • Constant amendments to the planning application are concerning; • The revised proposal has not addressed the key issues; • Paragraph 5.36 of the planning statement indicates that Persimmon has sought to engage with the local community. This is certainly not the case for the revised plans. 	<p>Noted.</p>
<p><u>Miscellaneous:</u></p> <ul style="list-style-type: none"> • The recent electrical works on Pinner Park Avenue took months and left the grass verges in a mess. 	

3rd Consultation

- 4.14 A third round of consultation was undertaken following receipt of revised documents and additional CGI drawings. Whilst minor amendments had been made to the proposal since the consultation in September, no significant revisions had been undertaken.

- 4.15 5 Site Notices were erected on 17th November 2017.
- 4.16 Press Notices were advertised in the Harrow Times and Harrow Observer on the 23rd November 2017.
- 4.17 The application was advertised as the following:
A Major Planning Application;
Planning Permission Accompanied by an EIA; and,
Setting of a Listed Building.
- 4.18 A total of 1733 consultation letters were sent to neighbouring properties on 17th November 2017 regarding this application. 10 letters of objection were received.
- 4.19 Whilst it is noted that the amount of objections received is significantly less than previous consultation periods, as there are no significant amendments to the proposal since the consultation period in September, it is considered that the previous concerns remain. Various residents have contacted the LPA in this respect.
- 4.20 The below is a summary of any submission which has not previously been raised:

Summary of Comments	Officer Comments
<ul style="list-style-type: none"> • Harrow need to take a sensible approach to new builds and should be looking at minimum numbers, not maximum. • No consideration has been given to the impact on local amenities and infrastructure as part of the revised proposal. • A local review of road safety is required before planning permission is granted; • Concerns regarding the impact on Headstone Manor- queried whether Historic England has commented. • It is difficult to work out the revisions to the proposal, except from the additional 2 dwellings. 	<p>Historic England has provided final comment on the proposal.</p>

4.21 Statutory and Non Statutory Consultation

4.22 The following consultations have been undertaken:

LBH Environmental Health
LBH Highways
LBH Travel Plan Officer
LBH Planning Policy
LBH Design Officer
LBH Conservation Officer

LBH Landscape Architect
LBH Waste Officer
LBH Biodiversity Officer
LBH Housing Enabling
LBH Drainage Authority
LBH Economic Development
LBH Tree Officer
LBH Drainage Officer

National Planning Casework Unit
TFL
Greater London Authority
Environment Agency
Designing Out Crime Officer, Metropolitan Police Service
Affinity Water
Thames Water Authority
Campaign for a Better Harrow
Natural England
Historic England Archaeology
Kingsfield Residents Association
The Pinner Association
Hatch End Association
Ministry of Defence
Brent and Harrow Chamber of Commerce
Health & Safety Executive
Commission for Architecture and the Built Environment
Network Rail
London Underground

4.23 Internal Consultation

4.24 The following consultations have been undertaken on 3rd October, 19 September and 17th November 2017.

Consultee	Summary of Comments	Officer Comments
LBH Conservation	<p><u>First Consultation:</u> The increased height would result in an adverse impact on the setting of the listed buildings. The revised proposal would further reduce the sense of openness of the original historic setting.</p> <p>The mitigation / justification provided is not sufficient.</p> <p>No key views have been provided making full assessment difficult.</p>	<p>The applicant was advised of these concerns.</p> <p>The amended proposal will seek to address the openness around the green space.</p> <p>Key views and justification will be provided in support of the revised design.</p>
	<p><u>Third consultation:</u> The intensified Harrow View West development will have a stronger impact on setting (and significance) than the consented scheme would have given this would have been less dense and tall. It would make the presence of the suburban development more keenly felt in relation to this significant and excellent group of heritage assets at this manorial site, particularly the grade I listed moated manor. This would be so particularly in key view12 (figure 2n of the heritage statement addendum).</p> <p>The surrounding open space and green landscaping and softening of any surrounding development in relation to this group is therefore important to retain in order to retain part of its significance. <u>Landscaping</u></p>	<p>Noted. Condition of approval attached.</p>

	<p><u>should therefore be conditioned on any approval to ensure this.</u></p> <p>Given the increase in harm there should be some corresponding 'clear and convincing justification' as required by NPPF paragraph 132 and an increase in public benefits as required by NPPF paragraph 134. I have not been able to identify these by the documents provided.</p> <p>In summary, there is an increased harm that would be caused by this proposal that can be defined as less than substantial harm under the NPPF paragraph 134. There needs to be corresponding clear and convincing justification and public benefits to outweigh this harm.</p>	
LBH Highways	<p><u>First Consultation:</u> Trip Generation: Disagree with the methodology used to measure trip generation. Data provided indicated that increased trip rate would be insignificant.</p> <p>Proposed cycle parking recognises the requirements of the London Plan 2016 by acknowledging that 853 long stay spaces are required, however the transport assessment alludes to actually providing significantly less on opening and then monitoring cycle use via the travel plan. This is not acceptable and the full level of cycle parking provision must be made on opening. It is also unusual that physical stores are not proposed for many of the flats</p>	Applicant to review.

	<p>and instead it is assumed that there is adequate space within the flat itself for cycle storage. This does not conform with the requirement to provide sheltered, secure accessible cycle storage, rather it seems to be avoidance of having to provide the facility.</p> <p>Public Transport: It is likely that this development will increase the demand for public transport trips. The applicant should obtain bus capacity data from TfL to demonstrate that there is sufficient space within the existing services to accommodate extra passengers. The section on trip generation in the Transport Assessment does not provide any information on trips other than those made by car. Census data shows that 43.6% of people travel to work using public transport in Harrow.</p>	
	<p>Second Consultation: The Transport Assessment has quite a few inaccuracies.</p> <p>The current section 106 contributions for highways improvements are already agreed however in light of the additional dwellings proposed on this site we would support TfL's request for funds for an additional bus service as there are likely to be more trips generated on public transport and the PTAL here is low.</p>	<p>Noted.</p>
	<p>Third consultation: Car parking ratio agreed.</p> <p>The main impact is likely to be on sustainable travel modes but the s106 contributions</p>	<p>Bus contribution within S106.</p> <p>Parking Management plan would be secured by condition.</p>

	<p>already agreed will aid improvements which should mean that the additional residents will be catered for. I understand that TfL have discussed additional funds for bus services.</p> <p>A robust parking management plan is required to ensure that parking is limited to the specific parking areas.</p>	
LBH Travel Planner	<p>First Consultation: The Travel Plan is not currently acceptable and significant improvements and amendments must be made in order for this to be approved and agreed prior to the Section 106 agreement being signed (details provided in 'required changes' document).</p> <p>Heads of Terms should include the Travel Plan requirements, including the Car Club and various financial elements.</p>	Consultation response provided to applicant.
	<p>Third consultation: The travel plan is acceptable. The only issue is they have not committed to paying a Travel Plan Remedial Sum, which is repayable if targets are met after 5 years, but is otherwise held and used if necessary for Remedial Measures.</p>	Noted.
LBH Drainage	<p>First Consultation: The FRA is unsatisfactory. Full details of the changes proposed showing each catchment with all impermeable area marked, drainage layout and cross section of sw storage is required.</p> <p>The applicant should apply for TW for increased foul</p>	<p>Consultation response provided to applicant.</p> <p>Drainage meeting held on 16 March 2017.</p>

	<p>discharge consent.</p> <p>Concerns regarding the depth of the bank within swale in catchment 2.</p>	
	<p>Third consultation: The revised FRA is acceptable, subject to standard conditions.</p>	Noted. Conditions to be attached.
LBH Environmental Health	<p>First Consultation: Information insufficient.</p> <p>A specific survey based on latest BS 4142 is required to ensure that the plant and equipment would not cause nuisance to noise sensitive premises. Target for noise rating levels should be at least 10 dB below background for planning purposes. Report should specify noise and vibration levels for selected equipment.</p> <p>The site is the <i>only</i> site listed on Harrow's contaminated land register. Until confirmation has been received then this will remain as contaminated land until such time as the developers contractors provide us with the reports to state otherwise.</p> <p>As this is a major development, air quality assessment and air quality neutral assessment should be included.</p> <p>Insufficient information has been submitted with regards to the control of dust and emissions during construction.</p>	Consultation response provided to applicant.
	<p>Second Consultation: A condition requiring a CEMP</p>	

	<p>is required.</p> <p>One point to get changed – for construction hours, report assumes 0700 – 1800 Mondays to Fridays, 0700 – 1300 Saturdays, and not on Sundays or Bank holidays. This needs to be changed from 0700 to 0800.</p> <p>Report says it only considers the operational phase. The Sustainable Design SPG says an AQ assessment is also required to assess the impact of the construction phase. This should include details of mitigation measures required for dust and pollution emissions control in line with the control of dust and emissions during demolition and construction SPG.</p>	
	<p>Third consultation: No response received.</p>	
LBH Biodiversity Officer	<p>No response received.</p>	
	<p>Third consultation: Given the scale of the development and the proximity of suitable foraging within the vicinity, it is suggested that the number of boxes be increased and that there be a greater variety in what is offered [This will be consistent with what is also being required at Harrow View East]. An additional reason is that several bat species regularly move location as conditions change over the course of the season. Hibernation opportunities should also be provided. Boxes made of woodcrete or similar materials should be used. Strong encouragement should be given to the incorporation of nesting</p>	<p>Noted. Conditions attached.</p>

	<p>boxes/tunnels within the fabric of the buildings wherever possible.</p> <p>Condition recommended for enhanced nesting opportunities and green roofs .</p>	
LBH Landscape Architect	<p>First Consultation: The site is dominated by hard surfacing so it is important for as many new trees as possible. Additional tree planting required around car park and to soften edges.</p>	<p>Consultation response provided to applicant.</p>
	<p>Third Consultation (detailed comments included within body of report): There is more scope to incorporate soft landscaping within the site. Standard conditions are required to readdress this.</p>	<p>Noted. Conditions to be added.</p>
LBH Education	<p>First, second and third consultation: No response</p>	
LBH Waste Officer	<p>First consultation: Roads need to accommodate Mercedes-bens Economic (3.3m width x 11m in length).</p> <p>Limited detail provided regarding refuse storage capacity.</p>	<p>Consultation response provided to applicant.</p>
	<p>Third consultation: Meeting held with Steve Compton. No objections raised.</p>	<p>Condition to secure Refuse Management Plan</p>
LBH Economic Development	<p>Third consultation: An increase in contribution based on the increased in proportion of residential units on the site is required: Economic Development: £40,980</p>	<p>Contributions to be included within legal agreement.</p>

	<p>Employment Training: £77,980.</p> <p>These contributions are in addition to those previously secured.</p>	
LBH Housing Enabling	<p>First Consultation:</p> <p>It is hard to understand how a more intensive scheme can generate a lower proportion of affordable housing.</p> <p>No detail has been provided in terms of the size, tenure mix, location, amount or affordability of the units.</p> <p>The gross household incomes for shared ownership are high, considering the median annual household income in Harrow is £38,880 – so these properties will not be affordable to some Harrow households (or at least not the households that are most in need of low cost home ownership homes).</p>	Consultation response provided to applicant.
	<p>Third consultation:</p> <p>Supports the proposed housing offer, subject to viability review.</p>	Viability reviewed by consultant.
LBH Libraries, Sport and Leisure	<p>First consultation: The previous application included a S106 contribution for improvements to outdoor pitches and ancillary facilities. Is there potential to replace the approved MUGA with a 3G pitch.</p>	To be reviewed within S106 negotiations.
	<p>Second and third consultation: no response received.</p>	
LBH Policy	<p>Third consultation:</p> <p>The proposal achieves a 35.3% reduction in carbon emissions against Part L Building Regulations 2013;</p>	Noted.

	<p>these reductions are sufficient to meet the 35% requirement under the London Plan – Policy 5.2: Minimising Carbon Dioxide Emissions (noting that the application was referred to the Mayor before the zero carbon requirement came into effect in October 2016).</p> <p>The proposal is considered to meet the relevant requirements of the London Plan and the Harrow Local Plan with respect to carbon reductions, subject to the conditions / planning obligations referred to above being placed on any planning permission.</p>	
LBH Tree Protection Officer	The removal of the trees, including the Lombardy Poplars, has already taken place, as approved by the previous planning permission.	Noted.
LBH Urban Design Officer	<p>There are still some elements of the scheme that would benefit from further resolution, and I while it is not an example of good architecture, I do consider it to be acceptable in design terms - it has improved during the course of the application, and the design team has attempted to respond to the major points raised by the design review panel.</p> <p>Further detailed comments included within body of report.</p>	Noted. Discussed within the body of the report.

4.25 External Consultation

Consultee	Summary of Comments	Officer Comments
National Planning Casework Unit	First & second and third consultation: No response received.	
Transport for London	<p>First consultation: Transport Modelling: TFL does not agree with the methodology employed to estimate the vehicular trip generation nor the output which suggests that all the local junctions would operate within capacity post-development: The TA should cover the cumulative impact of the total number of units that would be approved on the site. TRICS data based on inner London sites with a much lower vehicular trip rate. Outer-London sites with lower PTAL should be selected. The modal splits should be re-worked based on recent census data (within the past 5 years).</p> <p>Contrary to the applicants modelling, TFL estimates that around 30% of the new flats in this development will generate either a new bus trip, or tube trip that starts with a bus- equating to 174 new bus trips. TFL are seeking to secure funds from the development (£95,000.00 per year for 5 years) to increase bus capacity in the area.</p>	Consultation response provided to applicant.
	On-going discussion following a review of the previous bus contributions (Harrow View West & Harrow View East).	
	<p>Third consultation: <u>Public transport</u> An earlier decision on the level of funding for bus service</p>	

	<p>improvements for both Harrow View West and East sites still stands, specifically relating to P/0873/14 and the associated varied planning agreement dated 22 December 2014. This split the allocation between the sites such that the West site was responsible only for £75,690 bus service contribution (index linked). Earlier this year the Council confirmed it is putting in the Heads of Terms a requirement for c£400k as part of the c£475k originally secured (a £75k payment having been already triggered by part-implementation which the applicant has paid). We are also expecting a carry-forward of the previously-secured £7,064 contribution to bus countdown from this West site, and £3,364 toward improvements to bus stops. These contributions are acceptable to TfL.</p> <p>The drawings indicate that “stacking” racks are used exclusively for long-stay cycle parking. Stacking racks are not suitable for children’s bikes, tricycles, cargo bikes or bike trailers. They cannot be used by residents who do not possess a considerable degree of both physical strength and dexterity, both for lifting into the top rack and crouching to lock a bike in the lower rack. TfL requests that designs are amended to provide a good proportion of traditional “Sheffield” racks which are accessible to all users and suitable for all styles and sizes of bike, while still meeting adopted London Plan quantum for each block.</p> <p>Regarding the (low) quality of the TA supporting info, I must say we have been unlucky with two sets of</p>	
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	consultants seemingly 'misunderstand' the clear requirement for proper consideration of cycle routes and location-compatible modelling. TfL note and accept that the LPA are recommending approval of the application.	
London Underground	Third consultation: No comment to make on application.	Noted.
Greater London Authority	<p>First consultation (summary): Whilst the scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan as set out below:</p> <p>Housing and affordable housing: The proposal to provide a significant intensification of development but reduce the percentage of affordable housing, is unacceptable. Concern is also raised that the provision of family housing would be significantly reduced.</p> <p>Urban design: The design approach for the site should be revised to ensure an imaginative response to increasing density, responding appropriately to the different character areas. Views from the adjacent listed buildings should be provided.</p> <p>Inclusive access: An inclusive access statement should be provided. The dwellings should conform to M4(2) and M4(3) standards.</p> <p>Climate change: further information should be provided regarding building efficiency, overheating, district heating, CHP and renewable energy to confirm compliance with London Plan</p>	The comments have been noted and the additional information was requested

	<p>energy policy.</p> <p>Transport: Trip generation data must be revised and revised. Suitable contribution towards highways an public transport mitigation should be secured. Cycle parking strategy should be reviewed.</p>	
	<p>Third consultation: 19% AH is viable given that the current scheme is clearly less risky than the extant scheme (as they have evidenced greater demand for flats) and that risk profile should be reflected in the viability. The approval needs a late stage review to be secured at 19%.</p> <p>We also need to make sure that the affordable units are actually affordable.</p>	Noted.
Historic England (GLAAS)	First consultation: The proposal is unlikely to have a significant effect on heritage assets of archaeological interest.	
Historic England- Development Management	<p>First consultation: The proposal has the potential to harm the setting of the adjacent designations within the Headstone Manor site. The following views assessments were requested during the EIA scoping opinion, however have not been provided:</p> <ul style="list-style-type: none"> • the farm yard between the Grade II* listed barn and Grade II listed outbuilding • the field to the north of the Grade II* listed barn • the bridge over the moat • the island itself, immediately to the east of the Manor House 	
	<p>Third consultation: The assessment concludes that the proposed development would not be visible in views on the</p>	Noted. Condition attached.

	<p>approach from the west towards the Headstone Manor complex (Views 11, 13 and 14). However, the development would be clearly visible above the existing treeline in views from the field immediately to the north of the Grade II* listed Tithe Barn towards Headstone Manor (View 12). This confirms our initial concerns that the development would cause some harm to the significance of the Headstone Manor complex by encroaching on its relatively secluded setting.</p> <p>Your Council should consider whether this harm has been justified (Para 132, NPPF) and appropriately balanced by the delivery of public benefits (Para 134, NPPF) in determining the application. Should you be minded to approve the application, we recommend that a condition is imposed to ensure that the historic hedgerow would be retained, and that additional planting along the western boundary would be undertaken to improve the screening of the development from Headstone Manor.</p>	
Environment Agency	<p>First consultation: No response received.</p>	
	<p>Second / third consultation: The application falls outside the Yeading Brook Floodzone 3B. There seem to be no other constraints on the site, therefore we would make no comment on this application.</p>	
Designing out Crime Officer (MET Police)	<p>First consultation: There has been no engagement with the Designing out Crime Department from the applicant. Further, the applicant has not provided any material relating to the security and safety of the site and any provisions to</p>	

	help reduce and mitigate against crime and anti-social behaviour	
	<p>Third consultation: If it is Harrow Council's desire to achieve a gold award, it should be able to as long as the developers and the architects follow my recommendations. The minimum expectation would be a silver award for a new development. We should consider the other developments within the Kodak site and the consistency of the security across all three of them, otherwise we may be creating potential hot spots and weaknesses in the future.</p> <p>Bronze awards are only for refurbishments or conversions, and would not be suitable for a new development.</p>	A condition would be attached in this respect.
Affinity Water	<p>First, second and third consultation: No response received.</p>	
Thames Water Authority	<p>First consultation (summary):</p> <p>Thames Water has been unable to determine the waste water infrastructure needs of this application. Should the local Planning Authority look to approve the application, we request that the following 'Grampian style' condition be applied:</p> <p><i>Development shall not commence until a drainage strategy detailing any on and/or off site drainage works has been submitted to and approved by the Local Planning Authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the</i></p>	

	<i>strategy have been completed.</i>	
Campaign for a Better Harrow	First, second and third consultation: no response received.	
NHS Harrow	First, second and third consultation: no response received.	
Health and Safety Executive	First, second and third consultation: No response received.	
Ministry of Defence (RAF Northolt)	<p>Second consultation: The application site resides in the statutory safeguarding zone surrounding RAF Northolt and occupies the statutory aerodrome height 91.4m, and bird strike statutory safeguarding zones surrounding the aerodrome.</p> <p>On reviewing the application plans, I can confirm that the MOD have no safeguarding objections to the proposal.</p>	Noted
Civil Aviation Authority	First, second and third consultation: No response received.	
Conservation Areas Advisory Committee	First, second consultation: No response received.	
Design Review Panel	<p><u>First RDP: 21/12/16</u></p> <p>Building Heights: The proposal is entirely four storey, resulting in a monotonous and unarticulated building form. Variation in heights would benefit the character of the development.</p> <p>Massing: The strategic move of proposing large blocks is problematic and it will be challenging to articulate them. Breaking the blocks down further would help improve massing and</p>	Comments incorporated into redesign.

	<p>appearance.</p> <p>Roof Form: The proposal consists entirely of flat roofs. Introducing variety in the roof form across the site would provide some variety and visual interest to the character of the scheme.</p> <p>Edge to Green Space: The relationship between the strong frontages and the green space needs further refinement. The edge should be permeable rather than hard, allowing the benefits of the green space to be appreciated by residents.</p> <p>Elevations: Limited detail has been provided in terms of elevation treatments and materials. It is important that the block elevations relate to the contrasting context of urban route and green route.</p> <p>Unit Layouts: The panel raised concerns regarding the quality of units. The circulation space, in particular, appears overly complicated. Individual unit sizes would benefit from an increase in order to improve layout.</p>	
	<p><u>Second DRP: 20/03/17</u></p> <p>Vision: The vision for the site needs to be clearly demonstrated. Currently it is unclear what this is and what the identity will be. The proposal is currently very urban in character but should aim to mediate between town and country.</p> <p>Urban Design: Urban structure of site needs further work. The streets would benefit from tightening up, the urban space feels very loose. The site would benefit from a more varied and relaxed approach to building heights. There is a lack of legibility to the current proposal, no clear hierarchy of spaces. Greater clarity of urban grain and the roles of</p>	<p>Comments provided to applicant.</p>

	<p>different spaces is needed.</p> <p>Buildings: more architectural variety is needed. This is a very large project and considerable more work is needed in order to develop a robustly designed group of buildings.</p> <p>The panel recommend that the design team pay particular attention to the villa type. The identity of the villas should be given to how they sit in the landscape.</p> <p>Landscape: a much stronger strategy is needed. The public realm and landscape need to be shown in detail.</p> <p>The pergola needs to be designed in detail, it should fill the spaces.</p> <p>Conclusion: It is disappointing that further progress hasn't been made since the last review. The quality of information presented was poor for an application of this scale and complexity. It is important that illustrations are presented at human scale in order to fully communicate the character of the scheme. It is also recommended that a model is used.</p>	
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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, The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan (AAP) 2013, the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan SALP 2013 [SALP].

While this application has been principally considered against the adopted London Plan (2016) policies, some regard has also been given to relevant policies in the Draft London Plan (2017), as this will eventually replace the current London Plan (2016) when adopted and forms part of the development plan for the Borough.

The document has been published in draft form in December 2017. Currently, the Mayor of London is seeking representations from interested parties/stakeholders, before the draft Plan is sent to the Secretary of State for Examination in Public, which is not expected to take place until the summer of 2019. Given that that the draft Plan is still in the initial stages of the formal process it holds very limited weight in the determination of planning applications.

Notwithstanding the above, the Draft London Plan (2017) remains a material planning consideration, with relevant policies referenced within the report below and a summary within Informative 1.

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
Housing
Residential Amenity
Townscape and Design Quality
Lifetime Neighbourhoods
Impact on Heritage Assets and Protected Views
Traffic, Parking and Servicing
Impacts on Trees and Biodiversity
Climate Change and Environmental
Infrastructure & S106

6.2 Principle of Development

Policy Context:

National Planning Policy Framework (NPPF)

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

6.2.2 The NPPF was taken into consideration as part of the examination-in-public of Harrow's Core Strategy, prior to the adoption of the Strategy in 2012, and informed the preparation of Harrow's other Local Plan documents prior to their adoption in 2013. Both the Core Strategy and the other Local Plan documents are therefore fully in accordance with the principles and policies of the NPPF.

6.2.3 The NPPF describes the pursuit of sustainable development as involving improvements to people's quality of life and to the quality of the built, natural and historic environment. At the heart of the NPPF is a presumption in favour of sustainable development.

The London Plan (consolidated with alterations since 2011) (2016)

6.2.4 The spatial strategy for London is set out at chapter 2 of the London Plan. It uses a number of strategic designations to identify areas for more accelerated levels of change, pursuant to the objective of accommodating London's objectively assessed development needs. Among the designations are 'Opportunity Areas' and 'Intensification Areas'. As part of the now adopted further alterations to the Plan, the strategic designation of Harrow & Wealdstone has changed from that of an Intensification Area to an Opportunity Area, with an expectation that higher density residential and mixed-use development on key strategic sites will contribute to the delivery of 3,000 jobs and a minimum of 2,800 new homes within the Area.

6.2.5 In recognition that population growth in London is likely to be significantly above that which was anticipated in the original 2011 version of the Plan, and informed by new evidence, the 2016 London Plan adopts an annual London-wide housing target for the new plan period 2015-2025 of 42,389 p.a. (up from 32,210 p.a. for the period 2011-2021). The Draft London Plan 2017 proposes to increase this figure to 64,935 p.a. Harrow's annual target for the current London Plan (2016) period is 593 p.a. (up from 350 p.a. for the period 2011-2021) and in the Draft London Plan this figure is proposed at 1,392 p.a. which is more than double the current figure. As with the original 2011 Plan, the targets contained within the 2016 London Plan fail to reconcile a potentially significant gap between household growth projections and the identified availability of land for new housing, meaning that the targets continue to be expressed as minima. There must be, therefore, a renewed emphasis on all boroughs meeting and exceeding their housing targets.

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

6.2.6 Harrow's spatial strategy for the plan period 2009-2026 is set-out in the Core Strategy (2012) and is predicated on a new, pro-active approach to growth management and place-making. The strategy focuses on the opportunity area, Harrow and Wealdstone, to deliver growth through higher-density residential and mixed-use development, it being a location with high levels of public transport accessibility and where there is capacity to accommodate and benefit from major change. Pursuant to the spatial strategy for London (Policy 2.13), the Core Strategy incorporates an objective to create 3,000 jobs within the opportunity area and a policy commitment to deliver a minimum of 2,800 new homes on sites to be identified and allocated in an area action plan.

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

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

- Ensure Headstone Manor and its range of heritage assets is provided an appropriate setting;
- Address industrial decline, low demand and poor connections between key development sites such as Kodak;
- Deliver a significant portion of the employment target set for the Heart of Harrow;
- Contribute to the delivery of job targets in the borough through employment-led development;
- Support the regeneration of Wealdstone town centre; and,
- Contribute to meeting the housing target and the requirement to provide a mix of housing within the Heart of Harrow.

6.2.9 The AAP also sets out a number of urban realm improvements and infrastructure requirements for the sub area. These include (but are not limited to): Improvements to pedestrian and cyclists provision at the eastern end of Headstone Drive to ensure linkages between Wealdstone and the Kodak site; potential pedestrian and cycle bridge/underpass across the railway line; amendments to traffic management systems along Harrow View; improved access arrangements to Headstone Manor; provide a green route through the Kodak site and improved open green space and recreational spaces, including equipped play spaces; new community centres, a health services expansion, primary school and a fee secondary school; incorporation of CHP into new development.

AAP Site Allocation 2 – Kodak and Zoom Leisure

6.2.10 As required by the Core Strategy, the AAP identifies sites with significant development opportunities over the plan period. These allocated sites are set out in chapter 5 of the AAP. They are essential to achieving wider regeneration objectives and are necessary to deliver infrastructure improvement across the Borough. It is estimated that the 22 allocated sites within the AAP boundary have a combined capacity to provide 3,684 new homes and to deliver over 3,000 jobs across the opportunity area.

6.2.11 The Kodak and Zoom Leisure site (site 2) is one such allocated site. It comprises two distinct areas, separated by Harrow View; the Zoom Leisure facility; and the Kodak site. The key objectives for this allocated site comprise:

- Breaking the industrial decline through employment-led regeneration providing diverse and modern employment space;
- Integrate new employment offer with the existing Waverley Industrial estate;
- Improved physical connection with Wealdstone town centre;
- Secure an open space link between Wealdstone town centre and Headstone Manor;
- Enable residential development to create mixed use and family housing;
- Provision of ancillary infrastructure;
- Overall increase in provision of open space; and,
- Integration with the surrounding street pattern.

6.2.12 The target outputs for the total allocated area are 1,230 jobs and 985 homes. It is noted that these targets were set prior to the strategic designation as an Opportunity Area.

Assessment of Material Planning Considerations:

Principle of Redevelopment of the Zoom Leisure site:

6.2.13 The principle of redeveloping the former Kodak Factory site (Harrow View East) and the former Zoom Leisure Sports Grounds (Harrow View West) was established in 2012 through the grant of outline planning application P/3405/11.

- 6.2.14 Within the wider Kodak master plan, the application site, referred to as Phase 1B, was designated for residential development. In order to offset the loss the designated open space, the approved layout of Phase 1B included the provision 27,170sqm of open space. The approved outline consent for residential development at Phase 1B of the Kodak master plan conforms to the residential land use designation as depicted within the conceptual diagram for Site Allocation 2, within the AAP (page 70).
- 6.2.15 Whilst it is acknowledged that there have been changes within the development plan policies since the grant of this first outline permission, namely the replacement of the Harrow Unitary Development Plan (2004) with the Local Development Framework (LDF), the thrust of achieving high quality development, increasing housing supply and increasing jobs remains broadly the same. At the time of considering the original outline permission, significant weight was afforded to the then emerging development plan policies which were at an advanced stage of their formal adoption.
- 6.2.16 In accordance with the parameters of the outline permission, the detailed residential redevelopment of the Harrow View West site (phase 1B of the wider Kodak master plan) was agreed in 2016, through the approval of reserved matters planning application P/2982/15. This application granted detailed planning permission for the construction of 314 residential units within single-family dwelling houses and purpose-built apartment buildings. In line with the parameter plans approved under P/3405/11, the proposal also included 27,170sqm of open space, provided within a green link extending from Harrow View and an area of open space located adjacent to Headstone Manor.
- 6.2.17 Construction and occupation of the approved residential development has commenced at the northern end of the application site. In this context, the lawful use of the application site for residential development (Use Class C3) has been established.
- Proposed Intensification of the approved residential use:*
- 6.2.18 As referenced within the description of the proposed development, the applicant is seeking full planning permission for the enhanced residential development of the area included within the redline site boundary. The remainder of the site would be constructed in accordance with the RM Consent.
- 6.2.19 As full planning permission is sought, the proposed development is not bound by the approved parameters of outline consent P/3405/11. Nonetheless, the extant permissions form a basis for the redevelopment of the site.

- 6.2.20 The subject application proposes 425 residential units (Class C3) within the intensified redline site boundary. In addition to this, 144 dwellings would be built-out in the wider site area in accordance with RM Consent P/2982/15. In total, 569 dwellings (Class C3) are proposed across the wider Harrow View West site (blue site outline). This represents an uplift of 255 residential units from the extant permission P/2982/15. In terms of density, the proposed development represents an uplift from 39 dwelling/ha to 73 dwelling/ha.
- 6.2.21 Following the submission of the reserved matters application P/2982/15, which approved 314 residential units at the application site, material circumstances have emerged to justify the proposed intensified residential density:
- 6.2.22 Opportunity Area: The subject site is located within the Heart of Harrow which encompasses Harrow Town Centre, Wealdstone Town Centre, the Station Road corridor linking these two centres, and the industrial land and open spaces surrounding Wealdstone, including the Kodak site, Headstone Manor and the Harrow Leisure Centre. Following the 2015 consolidation of the alterations to the London Plan, the designation of the Heart of Harrow changed from that of an Intensification Area to an Opportunity Area. The London Plan states that 'Opportunity Area are the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvement of public transport accessibility' (par 2.58). This new designation offers significant opportunity for urban renewal and regeneration to provide a stimulus to regenerate Wealdstone and rejuvenate Harrow Town Centre. The Opportunity Area designation is expected, through higher density residential and mixed-use development on key strategic sites (including the application site), to contribute to the delivery of 3,000 jobs and a minimum of 2,800 new homes within the area.
- 6.2.23 In accordance with the intent of the Opportunity Area, as defined by the London Plan and Harrow and Wealdstone Area Action Plan, the application site has been identified as a key strategic site for its ability to accommodate a significant amount of new housing.
- 6.2.24 Housing Zone: In June 2014, the GLA produced a prospectus on Housing Zones which was informed by the then draft Mayors London Housing Strategy (LHS) (which was formally adopted in October 2014). The intention of this was to help boost housing supply in London in recognition of the projected population growth anticipated during the plan period. In all, a total of 20 Housing Zones are expected over a ten year period which would help deliver 50,000 new homes as part of the Mayor's efforts to double house building in London, including supporting 250,000 Londoners into low cost home ownership, through part rent, part pay, over the next decade. The Government and the GLA are jointly committing funding of £400m (in the form of repayment investment, flexible funding and grant) for the 20 Housing Zones to help realise this vision. The consolidated London Plan 2016 sets out under policy 8.1B that the Mayor will work with the Government on implementing initiatives to realise the potential of large development areas through these Housing Zones.

- 6.2.25 Bids from London Authorities were invited in September 2014. In February 2015, the Mayor announced London's first 9 Housing Zones, of which the London Borough of Harrow was a successful bidder. The entire Heart of Harrow Opportunity Area is now designated as a Housing Zone. It is envisaged that this will help unlock and accelerate the delivery of more than 5,000 new homes over the next ten years, and that this will be achieved through targeted investment, engagement and planning. This figure of 5,000 new homes is almost double the number of homes envisaged in the AAP. Housing Zones are designed to work flexibly depending on the local circumstances, and new homes are expected to come forward in a master planned approach, delivering strong communities through urban design and achieving coherent neighbourhoods. All new development in Housing Zones is expected to deliver successful place-making and secure residential and mixed use development of a high standard.
- 6.2.26 Following the designation of the surrounding area as an Opportunity Area and housing zone, it is noted that Harrow View East (Kodak Factory site) came forward to intensify the original outline permission. Specifically, in December 2015, an intensified outline permission (P/2165/15) was granted for the land at Harrow View East (the Kodak Factory site). In addition to increases in Class B1, D1 and C2 floor space, the proposal increased the provision of residential units from 671 to 1,800.
- 6.2.27 In the context of the application site, it is considered that given the limited period between the designation of the Heart of Harrow as a Housing Zone and the submission of the reserved matters application, the residential density proposed and subsequently approved within this application did not reflect the accelerated delivery of homes intended for the area. In this respect, soon after the grant of the reserved matters application, the LPA and the applicant commenced discussion regarding the possibility of bringing forward an intensified residential development at the application site.
- 6.2.28 For these reasons, it is considered that the location of the site within the Harrow and Wealdstone Opportunity Area, a designated housing zone, supports the principle of higher density residential development. Furthermore, when considered in context with the extant permission for Harrow View East (P/2165/15), the proposed higher density residential development would play a fundamental role in achieving the Borough's housing targets, as required by the Mayor of London.

Conclusion:

- 6.2.29 This current planning application seeks to bring forward an intensified residential scheme following the re-designation of the Heart of Harrow (Harrow and Wealdstone Intensification Area) as an Opportunity Area (London Plan 2015) and as one of the Mayor's Housing Zones.

6.2.30 Overall, it is considered that the current proposal would make a valuable contribution towards the delivery of target housing outputs including affordable housing units for the Heart of Harrow Opportunity Area and for the wider Borough. Accordingly, subject to appropriate controls and contributions towards new infrastructure that would acceptably mitigate the impact arising, the principle of providing additional residential dwellings at Harrow View West is considered to be acceptable and in compliance with the Development Plan for Harrow.

6.3 Regeneration

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

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

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

6.3.3 Although not a part of the Local Plan, it is notable that the Council has recently published a Regeneration Strategy for the period 2014-26.

6.3.4 This document identifies that the redevelopment of the Kodak site and the Colart site alone provides the biggest opportunity to regenerate the Wealdstone district centre. It goes on to state that the delivery programme for the Opportunity area will create a vibrant new place that celebrates Harrow's diversity and significantly raises the quality of design

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

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

- 6.3.7 The application site was last in operation as a private Leisure Centre (Zoom Leisure) with ancillary parking for the Kodak factory. Whilst the centre's grounds and facilities were of an acceptable standard, the grounds were not publically accessible. The grounds and hall were however available to social and sporting clubs for a fee. The Zoom Leisure centre closed in September 2011 and the site remained closed until late 2016, when construction of extant permission P/2982/15 commenced.
- 6.3.8 Given the private nature of the leisure centre and sports grounds, it is considered that the site represented a missed opportunity to serve the local community through the provision of public realm and public outdoor amenity space. A consequence of the previous use was that access to the Headstone Manor grounds was not available from the East, along Harrow View. In general, pedestrian and cycle connectivity in the surrounding area was poor.
- 6.3.9 In this context, the proposed redevelopment of the site presents an opportunity to provide new spaces and places for the public and improved connectivity in the surrounding area. Specifically, the applicant is proposing to improve connectivity through the inclusion of a green link, which would extend from the south-eastern corner of the site on Harrow View, to a large area of open space located adjacent to Headstone Manor grounds. The extent of the Green link across the wider Kodak master plan site (Harrow View East and Harrow View West) would provide a new pedestrian and cycle connection from the eastern end of Headstone Drive through to the Headstone Manor grounds. In addition to the green link, the application site would provide a substantial area of public realm adjacent to the Headstone Manor grounds and a number of pocket parks with formal and informal play equipment. All areas of open space, with the exception of the proposed courtyard areas, would remain open to use by the public. Furthermore, a multi-use game area is proposed on the edge of the green space, adjacent to the southern boundary. It is expected that this facility would be available for use by community sporting clubs, similar to that previously available by Zoom Leisure.
- 6.3.10 As concluded earlier, it is considered that the proposal would make a valuable contribution towards the delivery of target housing outputs for the Heart of Harrow Opportunity Area, the Borough and for London. It would include new public realm which has a strong potential to strengthen connectivity within Wealdstone and would positively relate to the adjoining Headstone Manor Recreation Ground. The psychological impact of the proposed development on future potential investors cannot be quantified. However it is considered that the provision of a large scale development on a highly conspicuous site close to Harrow and Wealdstone Station would help to increase confidence in the District Centre (and indeed the Borough) as a place to invest.

- 6.3.11 In accordance with Harrow's Planning Obligations SPD, the Council's Economic Development Unit has requested a contribution from the development to fund local employment and training programmes. Such contributions are considered necessary to ensure that the proposal contributes effectively to the Borough's wider regeneration objective. It is therefore recommended that appropriate provisions be made as part of a Planning Obligation.
- 6.3.12 As a whole, it is considered that the proposed development would deliver a scheme that would accord with the core objectives of the Regeneration Strategy (2014 - 2026) and the Local Development Plan. It is envisaged that the proposed development would provide enhanced benefits to the local community through improved connectivity and the provision of open space and would ultimately act as a catalyst for regeneration in Wealdstone District Centre.

6.4 Housing

- 6.4.1 Paragraph 48 of the NPPF states that housing applications should be considered in the context of the presumption in favour of sustainable development.
- 6.4.2 London Plan and Local Plan policies on housing development must be viewed in the context of the forecast growth across London and also taking into consideration Harrow's spatial strategy for managing growth locally over the plan period to 2026. In this regard, it is noted that following the further alterations to the London Plan, London's annual housing monitoring target increased from 32,210 to 42,389 homes per annum, and this includes Harrow's target which has increased from 350 per annum to 593 per annum. For Harrow, this translates into a new ten-year target to deliver 5,927 homes (Table 3.1 of The London Plan 2016). It is proposed to increase this further in the Draft London Plan (2017). As noted elsewhere in this report, the further alterations to the existing London Plan acknowledge the growth potential of Harrow and Wealdstone by upgrading its status from that of an Intensification Area to one of an Opportunity Area. Further to this, the Council's AAP identifies the application site as a strategic site within the Opportunity Area, for its potential in accommodating residential growth.

Housing, Supply, Density and Overall Housing Mix

- 6.4.3 The applicant has submitted a Housing Statement, providing a summary of the residential offer of the proposed development.
- 6.4.4 As previously discussed, the proposed development within the application redline comprises 425 new residential dwellings (use class C3), this equates to a total of 27,858 sqm of residential floorspace (GIA). The 425 dwellings provide a mix of dwelling sizes, including 1, 2 and 3 bedroom flats and 4 x 2 bedroom houses. All 425 dwellings have been designed in accordance with the minimum internal space standards as detailed within the London Plan and the Mayor's Housing SPG.

- 6.4.5 As detailed elsewhere in this report, the proposed development sits within the wider Harrow View West site which is currently under construction in accordance with the RM Consent (ref: P/2912/15). Within this phase of development, 144 dwellings are being delivered , comprising a mix of 2, 3 and 4 bedroom houses and 19 x 2 bedroom flats.
- 6.4.6 For the purpose of assessing the housing supply, mix, and density, the following section considers the cumulative residential development across the wider Harrow View West site. This includes both the 144 dwellings being delivered in accordance with the RM Consent and the 425 dwellings proposed within the planning application boundary.
- 6.4.7 Table 3 below, provides an overview of the proposed residential mix across the wider site.

Table 3: Residential Mix (Proposed and Wider Harrow View West site)

Dwelling size	Number of dwellings	Percentage Mix
1 bed	72	12.7%
2 bed	386	67.8%
3 bed	75	13.2%
4 bed	36	6.3%
Total:	569	100%

- 6.4.8 An assessment of the residential offer is discussed below.
- Density*
- 6.4.9 London Plan Policy 3.4 Optimising Housing Potential seeks to optimise housing output from development by applying the sustainable residential quality density matrix at Table 3.2 of the Plan. Whilst it is noted that the density matrix has been omitted from the recent amendments to the London Plan (2017), this documents is in draft form and as such, at the present time, it can only be afforded limited weight. For this reason, and in accordance with local policy DM6 Optimising Housing Density, the London Plan density matrix has been utilised to assess the density of the proposed development.
- 6.4.10 In accordance with the density matrix, the site is located in an urban area with a public transport accessibility rating of 2, indicating a low level of accessibility. In this context, housing output of 70 to 170 units per hectare is expected.
- 6.4.11 The applicant's planning statement advises that the cumulative density of the wider Harrow View site (7.9 hectares) would result in a density of 72 dwellings per hectare. Accordingly, whilst it is acknowledged that concerns have been received from local residents regarding the over-development of the site, the proposed density sits at the lower end of the expected density range of the London Plan and is therefore accepted.

Housing Type & Dwelling Mix

- 6.4.12 Paragraph 50 of the NPPF states that local planning authorities should plan for a mix of housing, based on demographic and market trends, and the needs of different groups, and that they should identify the size, type, tenure and range of housing that is required in particular locations. This approach is reflected by Policy 3.8 of the London Plan 'Housing Choice' and Policy DM24 of the DMP 'Housing Mix'.
- 6.4.13 Various concerns have been received from surrounding residents regarding the loss of family sized houses, which were previously approved within the RM Consent (ref: P/2912/15). Further concerns were received in regards to the provision of purpose built flats and the associated influx in population that would result. Within the stage 1 referral, the GLA also raised concerns regarding the loss of family sized dwellings.
- 6.4.14 As demonstrated above, whilst the proposal intends to replace a proportion of the approved housing with purpose-built flats, the resulting density remains to be at the lower end of the expected density range for the site. Furthermore, it is noted that the Council has not prescribed a housing mix for market housing in the Local Plan, preferring instead to advocate flexibility to respond to circumstances including the location and nature of proposed developments.
- 6.4.15 Notwithstanding this, following the initial concerns raised by the GLA and surrounding residents, the applicant has worked with the LPA to ensure that the wider site would deliver an acceptable mix of purpose built flats and dwelling houses of varying sizes. Whilst the LPA was primarily concerned with ensuring that the provision of affordable rented units responded to the local demand, the provision of market sale units was also discussed. Specifically, the Council raised concern regarding the high proportion of 1 bedroom 1 person units and 2 bedroom 3 person units proposed. Whilst the applicant advised that their knowledge of the market demonstrated a greater demand for such unit sizes, alterations were made to the internal configuration of the buildings to increase the size of some of these flats.
- 6.4.16 The final housing offer for the whole site includes 129 dwelling houses (22.6%) and 440 flats (77.3%). In terms of unit size, the proposal would provide 111 units (19.5%) which are 3bedroom or larger, to accommodate larger families. The substantial proportion of two bedroom units (67.8%) would be suitable for young professionals and small families, whilst the one bedroom units (12.7%), would respond to the market demand for single occupant flats.
- 6.4.17 Whilst the loss of larger dwellings when compared to the consented scheme is acknowledged, on balance, it is considered that the final mix of home types/sizes would respond to the location of the site and the current and future needs of the community. The proposal would add to the supply of contemporary dwelling houses and purpose-built flats in the area. Taken together with the affordable housing component, it is concluded that the proposal would promote housing choice and make a positive contribution to the creation of inclusive and mixed communities in Harrow.

Affordable Housing

- 6.4.18 The NPPF defines affordable housing as: social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Intermediate housing is defined as homes for sale and rent provided at a cost above social rent but below market levels.
- 6.4.19 London Plan Policy 3.12 Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes states that the maximum reasonable amount of affordable housing should be sought from individual proposals and negotiations should take account of the circumstances of the proposal including viability. The policy also establishes a clear expectation that affordable housing would be provided in the following sequential approach: on-site; off-site; or cash in-lieu contributions. Cash in-lieu contributions should only be accepted where this would demonstrably further the Plan's affordable housing and other policies.
- 6.4.20 The London Plan's housing policies are supplemented by the Mayor's Housing SPG (2016). In relation to affordable housing policies, the tone of the SPG is to further emphasise the need for policies to be applied in a manner that maximises output and, having regard to viability, to encourage not restrain housing development.
- 6.4.21 Having regard to Harrow's local circumstances, Policy CS1 (J) of the Core Strategy sets a Borough-wide target for 40% of all homes delivered over the plan period (to 2026) to be affordable, and calls for the maximum reasonable amount to be provided on development sites having regard to the following considerations:
- the availability of public subsidy;
 - the need to promote housing choice;
 - the provision of family housing;
 - the size and type of affordable housing required;
 - site circumstances and scheme requirements;
 - development viability; and
 - the need to meet the 40% Borough-wide target.
- 6.4.22 In terms of tenure split, the strategic part of London plan Policy 3.11 calls for 60% of affordable housing provision to be for social and affordable rent and for 40% to be for intermediate sale or rent. Paragraph 4.104 of the AAP Local Plan confirms that this tenure split will be applied throughout the Heart of Harrow, except within the Wealdstone Central sub area where the reverse tenure split is required under policy AAP13(c) in order to address a current imbalance in favour of social housing. It is noted that given the location of the site within the Wealdstone West sub-area, this policy is not relevant.

6.4.23 In terms of dwelling mix, London Plan Policies 3.11 and 3.12 both make reference to the priority that should be accorded to the provision of affordable family housing. Draft London Plan (2017) policy H5 doesn't make this distinction. Policy DM24 of the Development Management Policies Local Plan requires development proposals to secure an appropriate mix of housing on site and to contribute to the creation of inclusive and mixed communities, having regard to the target mix for affordable housing set out in the Councils Planning Obligations SPD; the priority to be afforded to the delivery of affordable family housing; and the location of the site, the character of its surroundings and the need to optimise housing output on previously developed land.

6.4.24 The proposed development incorporates a mix of private and affordable dwellings. In total 98 dwellings are proposed as 'affordable housing', comprising both Affordable Rented and Shared Ownership accommodation. This equates to a proportion of 23% affordable housing provision within the application boundary. However, it should be noted that upon request of the LPA, the Financial Viability Appraisal prepared by Bailey Venning on behalf of the applicant, assesses the affordable housing offer across the wider site (569 dwellings in total). As such, a further 10 affordable dwellings are included within the first phase of development of the wider site. In total, 108 affordable dwellings are proposed, totalling 19% affordable housing provision across the wider site.

Consideration of Proposal's Affordable Housing Offer

6.4.25 Within RM Consent P/2982/15, 60 units were proposed to be affordable housing, equating to a 19% affordable housing provision. This provision was compliant with the amendments made and approved as part of the Section 73 planning application (LBH ref: P/0873/14), in December 2014. Of the 60 affordable homes, 36 were proposed as Affordable Rented units (60%) and 14 were proposed as intermediate / Shared Ownership homes (40%).

6.4.26 Whilst it is acknowledged that the proposed scheme would provide an additional 48 affordable homes across the wider site, when considered in regards to the overall provision of housing proposed (569), the affordable housing offer remains at 19%. It is of great concern to the LPA that the significant intensification of the residential development across the site would not also result in an uplift in the overall percentage of affordable homes. The GLA shared these concerns within their stage 1 report. Specifically, at the time of the stage 1 referral the proposal did not provide a clear affordable housing offer, however the viability assessment suggested that between 13-18% affordable housing was viable. The GLA expressed that a proposed reduction in the proportion of affordable housing from the consented scheme, despite significant intensification, was unacceptable. It is acknowledged that since stage 1 referral the applicant has provided a clear affordable housing offer, which includes the location, size and tenure of the affordable units.

- 6.4.27 Given the offer is substantially below the 40% target (and the proposed 50% target contained in policy H5 of the Draft London Plan 2017) and also considering that the intensified proposal does not achieve an uplift in percentage of affordable homes, the applicant's viability assessment has been the subject of independent appraisal by consultant BNP Paribas Real Estate on behalf of the LPA ("the Council's independent appraisal"). BNP Paribas has scrutinised the applicant's Viability Assessment. Further to this, WT Partnership were appointed to scrutinise the construction costs. As such, a robust assessment of the viability information has been undertaken.
- 6.4.28 The applicant's final Viability Assessment prepared by Bailey Venning (BVA) and Construction Costs prepared by AECOM, follows on from a number of discussions between the applicant and the LPA over the last 11 months, primarily with respect to the design of the development and the unit mix of the affordable accommodation. Further discussions have taken place between the applicant's viability consultants (BVA) and the council's independent consultant BNP over an extended period. These discussions predominantly focused on construction costs and private sales values for flats and houses.
- 6.4.29 Accordingly, prior to the submission of the final Viability Assessment, the following areas were identified as agreed between the parties:
- Development Programme;
 - House Values;
 - Affordable Housing values (£231);
 - Developer's profit principles- 20% of GDV for residential element and 6% for affordable element;
 - Finances costs- principles and interest rates (6.75%); and,
 - Sales agents and legal fees on sale- confirmed within normal range; and
 - Ground rent charges of £300 per annum, including a yield of 5%.
- 6.4.30 The final version of the Viability Assessment was submitted to the LPA on 16th November 2017 and was subsequently reviewed by BNP.
- 6.4.31 In summary, the Review of Viability of Development contends that due to the high site benchmark value (the RM Consent), the development is unable to offer a policy compliant level in relation to the Affordable Housing provided. BNP's summary indicates that the proposed development is not technically viable, including the provision of 19% affordable housing. It is therefore reasonable to assume that the applicant anticipates growth in revenues over the course of the development. In this respect, BNP have recommended a review mechanism.
- 6.4.32 Accordingly, based on the review provided by the Council's independent consultant, the LPA agree the proposed offer of 19% affordable homes. The GLA have also reviewed the final viability assessment and have confirmed that 19% is the maximum achievable at this time. The GLA expressed the importance of a late stage review. Accordingly, acceptance of this offer is subject to a review mechanism which will be discussed below.

Proposed size and tenure of affordable housing

- 6.4.33 The development would deliver the proposal's affordable housing contribution on-site, in accordance with the expectations of the London Plan. The proposed provision of contemporary flats and larger family sized dwellings within Wealdstone would make a welcome addition to affordable housing stock by extending choice to those seeking an affordable home within an urban environment.
- 6.4.34 The affordable housing mix and tenure has been discussed in detail with the LPA and Housing Officers. The final offer has been agreed on the basis of local demand, which is specific to the borough. In terms of tenure, the proposal results in a split of 61% Affordable Rent and 39% Shared Ownership. This tenure split is considered to generally comply with the requirements of London Plan Policy 3.11 and AAP13 of the Area Action Plan.
- 6.4.36 It is noted that the applicant has engaged with the Harrow Council Housing department to ensure that the proposed mix (affordable rented homes and shared ownership) is aligned with the demand for affordable homes currently registered on the Harrow Council Housing waiting list. Accordingly, the proposed offer includes the following:

Table 4: Proposed Affordable Rented Accommodation

Unit size	Number	% of Affordable Rented Accommodation
1 bed (2 person)	7	11%
2 bed (3 person)	1	1%
2 bed (4 person)	39	59%
3 bed (5 person)	19	29%
Total:	66	100%

Table 5: Proposed Shared Ownership Accommodation

Unit size	Number	% of Affordable Accommodation
1 bed (2 person)	1	30%
2 bed (3 person)	0	0%
2 bed (4 person)	29	70%
3 bed (5 person)	9	22%
4 bed (6 person)	3	7%
Total:	42	100%

- 6.4.37 When compared to the RM Consent, the proposed affordable housing offer is considered to promote housing choice through the provision of contemporary one, two and three bedroom flats and larger family sized dwelling houses. Furthermore, 2 x 2bed 4 person and 9 x 3bed 5 person affordable rented units would be wheelchair adaptable, in line the with Council's demand. In this respect, the housing enabling team are in support of the proposed affordable housing offer.

Review Mechanism

- 6.4.38 London Plan Policy 3.12 makes reference to the re-appraisal of scheme viability and the Mayor's SPG provides further amplification, referring to such provisions as contingent obligations. Harrow's SPD also sets some expectations as to the use of such review mechanisms. It is considered necessary to require a review of scheme viability at an appropriate point in the development programme, and to seek additional contributions to affordable housing provision if appropriate in light of that review.
- 6.4.39 The applicant's Viability Assessment outlines reasons why the applicant believes a review clause is unjustified. Whilst these concerns are acknowledged, the Mayor's SPG clearly indicates that the re-appraisal of the scheme is expected. In this context, the LPA includes review mechanisms on all major developments where a policy compliant provision of affordable housing has not been achieved. Both the Council's independent consultant and the GLA have advised that the proposed affordable housing offer should only be accepted subject to a late stage review clause. Planning obligations to this effect are therefore included within the heads of terms.
- 6.4.40 Subject to the above mentioned planning obligation, officers consider that the proposed affordable housing offer is the maximum that the site can support at the present time. The proposal would deliver much-needed Affordable Rented units. To this end, the development would accord with the aims and objectives of the Development Plan in respect of affordable housing.

Conclusion

- 6.4.41 It is considered that the proposed mix of home types/sizes would respond to the location and characteristics of the site whilst optimising the housing output of this allocated site within the Harrow and Wealdstone Opportunity Area. The proposal would add to the supply of contemporary new build dwellings houses and flats in the area, all of which would achieve accessible and adaptable standards and 10% of which would also achieve the enhanced requirements needed to be classified as Wheelchair standard homes. Taken together with the affordable housing component, it is concluded that the proposal would make a positive contribution to the creation of inclusive and mixed communities in the Wealdstone West sub-area.

6.5 Residential Amenity

Residential Quality of the Proposed Development

- 6.5.1 London Plan Policy 3.5 *Quality of Design and Housing Developments* sets out several criteria for achieving good quality residential development. The policy aims to ensure that developments enhance the quality of local places and create homes that reflect the minimum space standards and are fit for purpose in other respects.

This is generally reflected in policies D1, D2 and D4 of the draft London Plan 2017. 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 bases for the assessment below.

Defining Good Places

- 6.5.2 As part of the AAP strategy for the transformation of the heart of Harrow, it is considered that the proposed development, together with that approved at Harrow View East, would make a positive contribution to the creation of high quality public realm, community facilities and a sense of place. The redevelopment of the Kodak site would improve permeability within the surrounding area and would improve the setting of Headstone Manor.
- 6.5.3 The application site has been allocated for residential development. The subject proposal would provide new opportunities for those seeking to live within a contemporary urban environment within the Heart of Harrow. Whilst the site would benefit from nearby public transport nodes and town centre shops and services, the extensive public realm would provide a unique setting for the future occupiers. Specifically, the green link, large area of open space, courtyard amenity spaces and pocket parks would create an opportunity for social interaction which would enhance the sense of community. The qualities of the public spaces would be diverse, so as to appeal to a range of demographics. The properties would form an edge to the public realm, which would increase the likelihood of neighbours meeting regularly and would stimulate natural surveillance from the residential occupiers.
- 6.5.4 Taking all of this into account, and conclusions about the quality of the development elsewhere in this report, it is considered that the proposal would provide a unique setting for residential development that would enhance the quality of the Heart of Harrow in accordance with the principles of the London Plan Policy 3.5 and draft London Plan policies D1 and D2.

Public Realm and Outdoor Play Space

- 6.5.5 Local Plan Policy AAP11 calls for sufficient amenity green space for private or shared use by occupants of the new dwellings. In line with this policy, the development is also required to contribute towards the quality and/or capacity of outdoor sports pitches, provide sufficient play space and local parks and/or pocket parks. The adequacy of the proposed public realm is appraised elsewhere in this report.

- 6.5.6 As aforementioned, the applicant is proposing to retain the principal area of open space and green link corridor, in accordance with the parameter plan of outline permission (P/3405/11). This approved area of open space (27,185sqm) equates to approximately 34% of the total site area. The approved landscape strategy included play space comprising five areas of local plan (LAP), two areas of locally equipped area for play (LEAP), one area of neighbourhood equipped area for play (NEAP) and a multi-use games area (MUGA). As the siting, provision and arrangement of the open space would not be altered within the subject application, this area has been omitted from the red site outline. Whilst an updated landscape strategy is proposed within the subject application and the details of which would be secured by way of condition, the overall provision and quality of approved open space would be retained within the current application.
- 6.5.7 In addition to this approved provision of public open space, within the current proposal, the applicant is introducing internal courtyard amenity spaces and additional communal grounds, located between the villas on the edge of the green. Submitted drawing 1002 Rev B, prepared by RPS, demonstrates that the proposed areas of public and shared open space within the development site now equates to 28,100sqm, a 35.5% proportion of the site.
- 6.5.8 In addition to the requirement for green space, Local Plan Policy AAP 11 requires all major development to provide sufficient play space on site to meet the needs of the development, whilst Policies AAP 13 and DM 28 Children and Young People's Play Facilities reiterate the need for children's play space. The Council's Planning Obligations SPD, informed by Harrow's PPG 17 Study, sets a quantitative standard of 4 square metres play space per child.
- 6.5.9 The outline permission fixed the amount of play space provision that would be required for the projected child yield from the development. In line with the requirements of outline permission, the RM consent (P/2912/15) included play space comprising 5 areas of local play (LAP), 2 areas of locally equipped play (LEAP), 1 area of neighbourhood equipped play (NEAP) and a multi-use games area (MUGA). Details of the play space were approved within the RM consent and by subsequent approval of details applications.
- 6.5.10 The applicant's Landscape Strategy and Planning Statement indicate that 2 x LAP's, 2 x LEAP's, and 1 x NEAP would be provided within the red site outline. It is also noted that the approved MUGA would be retained within the open space. Following discussion with the applicant, it has been confirmed that the proposal would retain the previously approved areas of play. The approved LAP that falls within the intensification area is proposed to be relocated to the courtyard area adjacent to blocks T, S and R.
- 6.5.11 The LPA calculate the expected child yield of the proposal to be 292. This represents a reduction from the child yield of 301 from the reserved matters consent. This reduction can be attributed to the reduction in family size dwellings. In this context, the previously approved areas of play are considered to be adequate to support the proposed development.

- 6.5.12 Furthermore, the distribution of play space across the site, for all ages, is appropriate. The play space would be accessible to the mobility impaired and would benefit from overlooking / passive surveillance, in accordance with the principles set out in the Mayor's Play SPG. A condition of approval would require further details of the play space and equipment.
- 6.5.13 Overall, the retention of the generous provision of green space within the development complies with the intentions of the site allocation and is considered to be a unique and important component of the development site. Furthermore, the addition of the shared grounds within the current proposal is considered to suitably respond to the increased density. Overall, the generous provision of public realm, semi-private courtyards and playspace would enhance the quality of the residential accommodation for current and future occupiers of the development and would also have apposite impact on the wider community.

Private Open Space

- 6.5.14 In addition to the provision of open space and public realm, the SPG seeks a minimum of 5.0sqm of private outdoor space for 1 & 2 person dwellings, increasing by 1.0sqm for each additional occupant. A minimum depth and width of 1.5m is sought for all balconies and other private open spaces.
- 6.5.15 Each of the dwellings is proposed with its own form or private amenity space. In most cases this is in the form of a private balcony, however for the ground floor dwellings this also comprises private terraces and patios. In addition to the private amenity spaces, a number of the apartment blocks back onto shared communal spaces within a number of courtyards. This applies specially to Blocks J, K, L, M, R, S and T.
- 6.5.16 With the exception of proposed blocks S and J which include some terraces fronting Harrow View, all balconies would either be overlooking quiet residential roads or areas of public realm and community amenity. In this context, the private amenity spaces would include an adequate outlook and would not be exposed to high levels of noise. With regard to the terraces fronting Harrow View, the applicant has submitted a Noise and Vibration Report which will be discussed below.
- 6.5.17 Whilst the majority of the units would be provided with private amenity space in accordance with the minimum requirements of the SPG, it is noted that in some cases, due to the design of the buildings, the minimum requirement is not achieved. Notwithstanding this, any shortfall in private amenity space is nominal and would not impact the quality of residential accommodation. Furthermore, given the site would have access to the green link and open space which would also provide dedicated play space for future occupiers, it is considered that a refusal on grounds of non-conformity to the SPG standards could not be substantiated in this case.

Entrances

- 6.5.18 The Mayor's Housing SPG calls for entrances to be visible from the public realm and clearly defined. The residential entrances to the buildings would generally face towards public realm and / or local highways. These areas would be naturally overlooked by surrounding dwellings located opposite. The location of the entrances along the front elevations would help to activate the new public realm within the proposed development.
- 6.5.19 Notwithstanding this, the proposal lacks a coherent rationale in terms of private and communal entrances to buildings. In some cases, officers consider it difficult to determine where the communal entrance to the flats is located. Further discussion and a recommended condition of approval is provided within the assessment of the architectural design (section 6.6).

6.5.20 *Shared Circulation*

- 6.5.21 In accordance with the SPG and to ensure the required high standard with regards to functionality, as sought by Local plan Policy DM1, it is considered that an audio-visual entry system should be installed or such other alternative security measures as may be appropriate and which should be agreed by condition.
- 6.5.22 The internal corridors would be served by windows and as such, would not be wholly reliant on artificial lighting and ventilation.
- 6.5.23 Whilst it is noted that some buildings would be served by only one lift, this is considered to be an acceptable design approach given the buildings would not exceed 7 floors. Notwithstanding this, the internal design of buildings ensures that the number of flats accessed from each of the cores would not exceed 8 and as such, most buildings include two lobbies and internal stairwells.
- 6.5.24 Overall, the internal circulation areas would achieve a good standard of layout for the future occupiers of this development.

Space Standards, Storage and Flexibility of Layouts

- 6.5.25 The minimum space standards and built-in storage requirements are set out at Table 3.3 of the London Plan and are reproduced within the SPG. This is also carried forward in the Draft London Plan (2017).
- 6.5.26 In addition to this, the Technical Housing Standards- Nationally Described Space Standards states that a double bedroom should be counted as such if it has a floor area of 11.5sqm, single bedrooms should be more than 7.5sqm and at least 2.5m wide. The SPG also calls for flexibility within dwelling plans so that at least one bedroom is capable of use as either a twin or double room, according to occupier preferences.

- 6.5.27 The proposed development has been assessed against the relevant London Plan space standards within Table 3.3. Each of the proposed flats would meet the minimum floor space standards for their respective dwelling size and occupancy. All of the proposed flats incorporate an element of storage in excess of the minimum standards within Table 3.3 of the London Plan. Notwithstanding this, it is considered necessary to secure this as a condition of any planning permission.
- 6.5.28 It is noted that various one bedroom flats (plots 85, 101, 508 in Blocks F, G and U) include bedrooms with a GIA of 11.8sqm. As discussed above, the Technical Housing Standards consider the minimum floor area for a double bedroom to be 11.5sqm. In this respect, the bedrooms within the aforementioned flats are able to accommodate 2 persons. Notwithstanding this, these flats do not achieve the minimum GIA for a 1 bedroom 2 person unit (50sqm) and as such, have been identified as 1 bedroom 1 person units. The intended occupancy of these flats has been demonstrated on the proposed accommodation schedule, which if planning permission is granted, would form an approved document.
- 6.5.29 In terms of individual room size, the proposed single and double bedrooms would also meet the minimum GIA requirements. Notwithstanding this, the minimum width of 2.5m for single bedrooms has not been achieved in some instances. Although it is regrettable that, as a new build development, all of the bedrooms would not fully comply with the housing standards, it is considered that the proposed shortfall would not noticeably restrict the circulation space in these rooms. In this respect, it is not considered that this shortfall would justify withholding planning permission.
- 6.5.30 In terms of the flexibility and adaptability of the proposed flat layouts, with the exception of the one bedroom single occupancy flats proposed, all other units would include a double bedroom, capable of providing either a double bed or two single beds, in accordance with the requirements of the Nationally Described Standards. Furthermore, whilst the applicant has not shown dining tables on the proposed flat layouts, it is considered that the furniture layout is indicative and each living room would provide adequate space and services to work from home.
- 6.5.31 Whilst it is noted that the proposed flats meet the minimum space standards, it is regrettable that the proposal could not have provided a greater proportion of units in excess of the minimum requirements. In some cases, the configuration of the flat results in an awkward layout with a large amount of 'dead space' within corridors. It is considered that the provision of units in excess of the minimum requirements may have resulted in the improved layout and functionality of the buildings and flats. Whilst it is considered that the internal configuration of the flats has not been well thought-out to maximise efficiency, compliance with the London Plan requirements is noted. Accordingly, on balance, the proposed flats are considered to provide an adequate standard of accommodation.

Privacy

- 6.5.32 The SPG calls for habitable rooms within dwellings to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces. Paragraph 2.3.30 of the SPG refers to the acoustic as well as the visual privacy of homes within a development- see appraisal under internal noise below.
- 6.5.32 In terms of building-to-building relationships, the minimum separation distances between the courtyard blocks would be:
- Between blocks K and M: 18m;
 - Between blocks R and T: 29m;
 - Between Blocks K and L: 26m; and
 - Between Blocks P and N: 31m.
- 6.5.33 These elevations would all contain habitable room windows and balconies, meaning that there would be some level of visibility to / from homes on other levels within the development.
- 6.5.34 However, given the high density nature of the proposal which is consistent with the need to make effective use of this allocated site within the London Mayor's Housing Zone, it is considered the proposed distances / relationships between buildings would generally secure an acceptable standard of privacy for future occupiers of the development. Furthermore, 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.
- 6.5.35 The submitted landscape plan shows landscaped defensible space for each of the proposed ground floor residential units.
- 6.5.36 Overall, it is considered that the proposal would secure a standard of visual privacy for future occupiers that is commensurate with the intended urban character of the proposed development.

Aspect

- 6.5.37 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 and back) or around a corner (i.e. front and side) and the SPG calls for development to maximise the provision of dual aspect dwellings.

6.5.38 Due to the location of communal hallways within the buildings, the proposal results in 106 single aspect flats. This equates to a proportion of 24.9% of the development (within the red site outline). It is regrettable that, as a new build development, the design and layout of the proposal could not have maximised the number of dual aspect flats. Notwithstanding this, it is noted that the single aspect flats generally comprise smaller 1 or 2 bed units to ensure sufficient light and outlook to the future occupiers. Furthermore, of the 106 single aspect units, 16 units would be single aspect north facing (3.7% of proposed development). Specifically, 6 units would be provided within Block D and 10 units within Block 10. A further 8 units within Block K would be single aspect, north-west facing.

6.5.39 Whilst the provision of single aspect north-facing flats is regrettable, it is noted that none of the single aspect flats would exceed two bedrooms in size. The majority of these units are small 1 bedroom 1 person units which, given the small scale and internal layout, generally require a lower level of light. Furthermore, it is noted that the single aspect north facing units within Blocks A and D have been oriented to the north due to the location of these buildings along the edge of the green link. Specifically, instead of resulting in overlooking to the approved dwelling houses to the rear of these blocks (first phase of RM consent), these blocks are afforded views over the public open space therefore avoiding overlooking of neighbours and providing a more superior outlook. On balance, it is considered that the future occupiers of the single aspect flats would not be exposed to unacceptably poor living conditions and it is considered that withholding planning permission on this basis would not be justified.

Internal and External Noise

6.5.40 Under sub-section D (h), DM1 states that when assessing privacy and amenity, regard should be taken to the impact of the proposed use and activity upon noise, vibrations, dust, air quality and light pollution. This is supported by London Plan policy 7.15B.

6.5.41 Furthermore, 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, amongst 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.

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

6.5.43 Potential impacts from external noise, such as road traffic and the CHP are discussed in later sections of this report.

Floor to Ceiling Heights

6.5.44 The SPG seeks a minimum floor to ceiling height between finished floor level and finished ceiling height in habitable rooms of 2.5 metres. Cross section shown on the application drawings confirms that this would be achieved within all of the proposed buildings.

Daylight and Sunlight within the proposed units

6.5.45 The SPG established no baseline standard for daylight or sunlight. Within the amenity considerations, Local Plan Policy DM1, detailed the requirement of an adequate level of light and outlooks within buildings (habitable rooms and kitchens).

6.5.46 A Daylight, Sunlight and Overshadowing Assessment has been included within chapter 15 the Environmental Statement. A standalone Daylight & Sunlight assessment has also been provided. This approach is more sophisticated than the Council's 45 degree code and so it is considered to be more relevant (than the code) in the assessment of the proposal's amenity impacts, pursuant to Policy DM1.

6.5.47 The Council has engaged the services of a specialist consultant to provide independent appraisal of the applicant's daylight and sunlight assessment.

6.5.49 For the purposes of measuring the performance of the proposed development, the assessment uses the Average Daylight Factor (ADF) and Annual Probable Sunlight Hours (APSH) methods for daylight and sunlight respectively.

6.5.50 The specialist consultant indicates that 83% of the sample rooms tested would satisfy the BRE recommendations. Given that the sample rooms are generally on the lower floors, the overall percentage adherence across the development is expected to be higher. Overall, there would be a reasonable good level of daylight amenity throughout the proposed development.

6.5.51 In terms of sunlight, out of the 78 rooms tested with a southerly orientation, 67.9% satisfy the annual sunlight guideline and 75.6% satisfy the winter sunlight guidance. The remaining 17 of the 95 sample living rooms tested for sunlight have a northerly orientation and will generally receive lower level of sunlight. Nevertheless, the Council's specialist consultant concurs with the applicant report that the proposed development would offer levels of compliance with sunlight guidelines typical of higher-density urban developments, particularly those with recessed balconies. The review also agrees that the amenity spaces tested would receive adequate sunlight provision.

6.5.52 Clearly it is desirable for a new development to achieve 100% compliance with the recommendations of the BRE guidelines. However, for high density, urban development it is inevitable that some compromise may be required between various planning considerations that may influence site layout. This is recognized by the Mayor's Housing SPG. It should be emphasised 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 part of the adopted development plan. Nonetheless, in accordance with the advice of the Council's specialist consultant, the proposal is considered to receive an adequate level of daylight and sunlight.

Conclusion

6.5.53 As discussed, the internal layout of the proposal results in small dwellings, which in some cases are single aspect north facing and / or include an awkward internal layout, which do not efficiently maximise the available space. The LPA consider it regrettable that, as a new build development, a greater effort could not be made to provide a high quality internal layout of the flats. Similarly, whilst the shared circulation of the buildings complies with the requirements of the SPD, officers consider that in some buildings, the shared circulation space could more efficiently be configured.

6.5.54 Notwithstanding this, 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. Overall, the majority of the flats would benefit from a good – very good level of outlook and light; all flats would meet the London Plan minimum space standards for flat size, room size and storage; and, all flats would have access to a private balcony or patio in addition to the generous provision of open space and informal and formal play space which supports the proposed development. In this respect, it is considered on balance, the poor performance of some parts of the development would not result in unacceptably poor living conditions for future occupiers and withholding planning permission on this basis would not be justified.

Amenity of Neighbouring Occupiers

6.5.55 London Plan Policy 7.6 *Architecture* stated 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,

6.5.56 Core Strategy Policy CS1 B requires development to respond positively to the local context in terms of design, siting, density and spacing. Policy DM1 requires all development to achieve a high standard of privacy and amenity, and sets out a number of criteria for the consideration of the same. The Council's Residential Design Guide supplementary planning document is also relevant.

- 6.5.58 In terms of the potential impacts of the proposal on surrounding residential amenity, submissions received during consultation of the application indicate that the primary concerns of surrounding residents relates to the impacts of the increased population on existing services and facilities. Specifically, submissions refer to the impacts on: the local road network; public transport; on-street parking spaces; hospitals and general practices; schools; noise and disturbance; and, air quality.
- 6.5.59 Whilst the impacts of the proposed density account for the majority of submissions, further concerns were also received in regards to the impacts of the proposed buildings on surrounding outlook, privacy and levels of daylight and sunlight.
- 6.5.60 Each of these concerns will be discussed in detail within the following assessment, with the exception of parking, public transport and highways impacts, which will be discussed in section 6.1 'Highways and Parking' of this report:
- 6.5.61 In terms of the potential amenity impacts resulting from the siting and scale of the proposed development, the nearest residential properties to the proposed development are as follows:

North

The northern parcel of the first phase of RM Consent P/2982/15 would sit directly adjacent to the northern blocks within the proposed development (Blocks X, W, V, U, Z, T, S). The minimum separation distance (8.5m approximate) would occur between proposed Block X and existing plot 277, located adjacent to the north-western corner of the site.

The rear gardens of Pinner Park Avenue and Holmwood Close would adjoin the northern and north-western boundary of the wider Harrow View West site. These properties adjoin the first phase of development currently under construction on the site and as such, would not directly adjoin the proposed development.

South

The southern parcel of the first phase of RM consent P/2982/15 would sit directly adjacent to the southern blocks within the proposed development. Proposed Blocks G and H would sit adjacent to the semi-detached dwellings on Edward Road. Proposed Block A would sit adjacent to a 3 storey apartment block on Downing Close, to the south.

East

The Kodak Factory site is located on the eastern side of Harrow View, approximately 39.0m from the proposed development. Whilst the Kodak Factory has outline consent, detailed planning permission has not yet been granted for the phase directly opposite. Notwithstanding this, given the separation distances which would be retained and the similar scale and proportions of the proposed developments, the proposal is not considered to result in an undue amenity to the proposed buildings fronting Harrow View. For these reasons, the planned development for the Kodak Factory site has not been included in the following assessment.

- 6.5.62 The impacts of the proposed development on these adjoining premises and the immediate surrounding are appraised as follows:

Visual impact, outlook & privacy

- 6.5.63 Undoubtedly, the proposed development would represent a distinctive new addition to the area. It would, by reason of its height and scale, be visible to occupiers of premises over a wide area. Whilst the concerns from surrounding residents are acknowledged and will be addressed, officers consider that the impact of the proposed development would be most pronounced for the first phase of development within the wider Harrow View West site. A wider impact would be experienced by surrounding properties on Pinner Park Avenue, Holmwood Close, Victor Road, Edward Road and Downing Close.

Properties on Pinner Park Avenue & Holmwood Close:

- 6.5.64 As discussed above, properties on Holmwood Close and Pinner Park Avenue are located to the north / north-west of the site, beyond the northern boundary of the wider Harrow View West site. These properties directly adjoin the first phase of development that is currently under construction and partially occupied. Given the location of the proposed development within the central area of the wider site and also when considering the generous rear gardens of properties on Pinner Park Avenue and Holmwood Close, a minimum separation distance of 100m is achieved to the rear elevations. Accordingly, whilst it is acknowledged that the proposal would be visible from the rear windows of these properties, the significant separation distances achieved would ensure that an appropriate standard of privacy and outlook would be maintained for these occupiers.

Northern parcel of first phase of development:

- 6.5.65 Given the close proximity between the first phase of development of the RM consent and the proposed development, the relationship between these buildings has been carefully considered to reduce any potential amenity impacts. The relationship between each of the buildings along the northern redline boundary are discussed below:

- 6.5.66 Block S and T: The footprint and siting of Blocks S and T generally align with the terraced housing approved within the RM consent. In this context, any perceived or actual overlooking from these proposed buildings would not differ greatly from the extant permission and as such, has previously been considered acceptable. Whilst the increase in height of the buildings would have some degree of visual impact for these properties, this relationship is not considered to be overly dominant or at odds with the wider character and relationship between buildings that are found elsewhere in an urban location.
- 6.5.67 Block U, V & Z: The angled relationship between the first phase of development and Blocks U, V and Z serves to provide some mitigation with regard to both visual impacts of the development and privacy for existing occupiers. Specifically, when combined with the separation provided by the road, the angled relationship ensures that no direct overlooking would occur between windows of the closest properties. Whilst some overlooking would occur to the rear amenity spaces of the closest properties, this is not unusual for urban areas. Whilst the proposed blocks would inevitably result in a dramatic visual addition to the existing environment, it is noted that these blocks have been restricted to 4 storeys, which is only a single storey higher than parts of the existing development. Further mitigating factors such as the carefully designed footprint of the buildings, the generous space around the buildings, appropriate materials and landscaping are considered to be sufficient factors to create a visually pleasing outlook for these occupiers.
- 6.5.68 Blocks X and W: Proposed Block X would generally align with the front elevation of the adjacent dwellings (plots 277-284). As these properties would be oriented away from the proposed buildings, no undue harm would result in terms of loss of privacy or outlook. Whilst Block W would sit forward of the front building line of plots 270-276, the separation provided by the road would mitigate any significant harm. Once again, whilst the construction of these blocks may result in perceived and actual overlooking to the rear gardens of these properties, the degree of overlooking is not considered to be inappropriate in the context of the urban environment.

Properties on Fairfield Drive, Edward Road and Downing Close:

- 6.5.69 As discussed above, the properties on Fairfield Drive, Edward Road, Downing Close and Victor Road are located beyond the southern boundary of the application site. Specifically, the properties on Fairfield Road would sit adjacent to the area of open space; Edward Drive would sit adjacent to Blocks G and H, whilst an existing block of flats on Downing Close would sit adjacent to a car parking area, located to the rear of proposed Block A. The rear windows of properties along Victor Road would face towards the application site.

- 6.5.70 In terms of outlook and visual impact, given the site has remained cleared for an extended period and previous to this was occupied by low-rise development, the proposal would undoubtedly result in a significant visual presence. It is acknowledged that due to the lower levels of these properties, the impact of the buildings would be accentuated. As such, officers accept that there would be a reduction in levels of outlook for these neighbours. A wider impact, although to a lesser degree, would be experienced by residents on surrounding roads with front and rear windows directed towards the application site.
- 6.5.71 The properties on Edward Road and Downing Close would have the closest relationship with the proposal. However, given the main front and rear windows of these properties would not face towards the development, any views would be from oblique angles or from the streetscene / rear gardens. Furthermore, whilst views towards proposed Blocks G and H would be prominent within Edward Road, it is noted that Block H would only sit a single storey higher than the neighbouring property on Edward Road and would generally align with the established front building lines. Proposed Block G, being a 4 storey villa, would be more visually prominent, however given the 18m distance (from the nearest property on Edward Road), it is considered these buildings would not be unduly overbearing.
- 6.5.72 Furthermore, whilst it is noted that there are flank windows in the nearest properties on Edward Road and Downing Close, the separation provided to the proposed Blocks would ensure no harmful impact would occur in terms of overlooking or loss of privacy.

East, opposite on Harrow View:

- 6.5.73 Immediately opposite the application site, along Harrow View, are two-storey semi-detached dwellings. Whilst these dwellings primarily sit opposite the approved four storey block of flats, currently under construction in accordance with the RM consent, two properties at the southern end of these housing would sit opposite the 6 storey element of Block S. Notwithstanding this, it is noted that Block S generally maintains the approved front building line, and as such, would not be any closer to the properties on the opposite side of Harrow View. Any additional harm to amenity would therefore be restricted to the additional two storeys proposed. However, officers note that the proposed buildings heights are only one-two storeys higher than approved development and appropriately respond to the future development planned on the Kodak Factory site. In view of this context and the separation distance provided by Harrow View, any visual impact and overlooking would not be detrimental to the residential occupiers opposite.

Daylight & Sunlight

- 6.5.74 The applicant provided a Daylight and Sunlight Assessment in support of this proposed development. This report assesses the effects of the proposed development on daylight and sunlight to the surrounding residential properties. This includes established existing properties on the northeast side of Harrow View, to the south of the site in Downing Close and Edward Close, as well as consented properties within the wider Harrow View West development site that have either been built, or are yet to be built. The assessment uses widely-recognised methodology to assess the proposal's impact upon neighbouring property against British Research Establishment (BRE) guidelines. This approach is more sophisticated than the Council's 45 degree code and so it is considered to be more appropriate for the assessment of the proposal's amenity impacts, pursuant to Policy DM1.
- 6.5.75 The Council engaged the services of a specialist consultant to provide independent appraisal of the applicant's daylight and sunlight assessment. The specialist consultant notes that the submitted report adopts the basic significance criteria recommended in the BRE guidelines for impact on neighbours. Notwithstanding this, the consultant concludes that these criteria should be considered by reference to the overall impact on an individual dwelling or block of dwellings, rather than necessarily related to individual windows. In this context, the specialist consultant requested that the additional data be provided.
- 6.5.76 Whilst the specialist consultant was generally in agreement with the finding of the applicant's assessment, the review identified inconsistencies and requested additional information and
- 6.5.77 In November 2017, the applicant provided a revised Daylight & Sunlight assessment that addressed the requests for additional information and also reflected the changes undertaken to the design of the proposal. Subsequent clarification was also provided in December.
- 6.5.78 The following conclusions were deduced in terms of the impacts on sunlight and sunlight to surrounding properties:
- 6.5.79 In terms of sunlight, the report reconfirms that the effect on sunlight to all tested buildings would be of negligible significance. The review does not agree with the applicant's conclusion that only the back gardens to plots 256 and 277 would experience moderate to major impacts, or that gardens to plots 249, 248 and 255 would receive adequate sunlight. Instead, the review concludes the following:
- Negligible effect on gardens 278, 257, 247 and 171
 - Minor adverse effect on garden 249
 - Moderate adverse effect on garden 248; and major adverse effect on gardens 277, 255 and 256 (consented scheme).

- 6.5.80 Notwithstanding this, the Council's consultant concludes that it is to be expected that some of the gardens would be affected beyond the BRE recommendation. The Council's consultant advised that the most-affected garden (plot 277) would remain to enjoy around 32% (mean) of its area based on a two-hour period of snapshots on 21 March.
- 6.5.81 In terms of daylight, the Council's consultant acknowledged that the vast majority of impacts would either be negligible or minor significance. It was confirmed that the only impacts of greater significance are the six side-facing windows serving the ground and first floor flats of 1 Downing Close, plots 171-175 Harrow View and plots 30-34 of the consented scheme. In justification, the applicant's assessment indicates that in an urban environment such as this, it is reasonable to expect sites to be developed with high-rise buildings, as proposed on the application site. Given the urban nature of the site and the scale of the development, it was considered that all occupants of these rooms would continue to receive good daylight levels for an urban area. This justification was confirmed and accepted by the Council's independent consultant.
- 6.5.82 The LPA has reviewed the final report in detail. Whilst the impacts on daylight to the ground floor flank windows of 1 Downing Close and plots 30-34 of the consented scheme are acknowledged and considered to be regrettable, the LPA acknowledge that these flank wall windows are south facing and would be sited a sufficient distance from the proposed development. Furthermore, whilst the impact on levels of daylight to these windows has been considered against BRE guidelines, both consultants have agreed that the occupants of these rooms would continue to receive good daylight for an urban area. On balance, given the scale of the proposal and the urban nature of the site and surrounding area, it is officer's opinion that the proposed development would not result in undue harm to surrounding occupiers in terms of daylight or sunlight.

Impact of increased density on services and community facilities

- 6.5.91 As noted above, this new application would seek a higher density on this site. The extant permission fixed maximum building heights at 4 storeys and proposed a total of 314 residential units. A review of the housing provision (below) indicates that at maximum occupancy, the development would accommodate a maximum of 1,551 persons.

	Approved RM scheme (P/2982/15)
1 bed flats	4
2 bed flats	55
3 bed flats	8
2 bed houses	27
3 bed houses	74
4 bed houses	146
total	314

6.5.92 In addition to the 144 residential units currently under construction in accordance with the RM consent, the proposal would introduce a further 424 residential units to the site. A total of 568 residential units would be provided across the wider Harrow View West site. Accordingly, in comparison to the extant consent, the proposed development would result in a site wide maximum occupancy of 2,053 persons.

	Approved	Proposed scheme	Total
1 bed 1 person	0	40	40
1 bed 2 person	0	31	31
2 bed 3 person	42	161	203
2 bed 4 person	16	167	183
3 bed 5 person	31	25	56
3 bed 6 person	19	0	19
4 bed 6 person	36	0	36
total	144	424	568

6.5.93 Whilst it is acknowledged that the housing provision over the wider site would increase by 254 residential units, the proposal seeks to replace a proportion of the approved larger family-sized houses with smaller units. As such, whilst the provision of residential units increases significantly within the proposal, overall, the maximum occupancy of the Harrow View West site would only increase by 500 persons. In the context of the 7.9 ha site, the increase of 500 persons is not considered to be an excessive amount. Furthermore, given the location of the site within the Opportunity Area and the Mayor's Housing Zone, the surrounding area has been identified as an area which can suitably accommodate higher density residential development.

6.5.94 Notwithstanding this, it is acknowledged that the introduction of a maximum of 2,053 persons into a predominantly residential area would raise concerns for existing residents of the surrounding area. This is evidenced by the volume of submissions received from surrounding residents during consultation of the application. In response to these concerns, it is necessary to refer to the original outline consent, and subsequent intensified outline consent, for which the application site originally formed part of. Specifically, the outline consent included a range of uses across the Kodak masterplan site and identified that Harrow View West should be restricted to residential development only. All supporting uses are therefore planned for the Kodak Factory site.

6.5.95 Specifically, the Kodak Factory site includes the following uses which will support the residential development on Harrow View West (as approved within the intensified outline consent P/2165/15):

Use Class	Total Amount	Types of Use
Business and employment (B1/B2/B8)	32,360sqm	Offices, light industrial, logistics, business incubation and start-up space
Residential institutions (C2)	10,230sqm	5,500sqm care home, 4,730sqm senior living accommodation

Retail (A1/A2/A3/A4/A5/B1(a)/D1)	4,000sqm	2,000sqm foodstore, 2,000sqm A1-A5/ B1(a)/D1 units
Non-residential institutions and assembly and leisure (D1/D2)	9,730sqm	1,060sqm leisure facility, 2,820sqm health centre, 1,570sqm community centre, 550sqm community centre/café, 3,630sqm primary school
Multi-Storey Car Park (Sui Generis)	8,900sqm	Multi-storey car park

6.5.96 Further concerns have been raised by residents in terms of the timeframes for the provision of these approved uses. As the development site is privately owned, the LPA has limited control over implementation of the planning permission and the commencement of the uses. Notwithstanding this, Condition 1 of outline permission P/2165/15 requires that the development shall be begun no later than three years from the date of this permission, or two years from the final approval of the final Reserved Matters application. This consent is dated 9 December 2015. Overall, it is considered that the approved uses which will come forward on the Kodak Factory site are sufficient to support the proposed population of Harrow View West.

6.5.97 Accordingly, as concluded within the officer's report for P/2165/15, through a combination of on-site and off-site financial contributions, the proposals are considered to address the expected needs of future occupiers of the Kodak site for community infrastructure to support sustainable patterns of living and working.

External noise, air quality and light pollution

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

Conclusion

6.5.99 Undoubtedly, the proposed development would represent a distinctive new addition to the area. It would, by reason of its height and scale, be visible to residents over a wide area. Notwithstanding this and as discussed above, it is considered that the separation distances between the proposal and surrounding properties when combined with the orientation, scale and siting of the proposed buildings would ensure that no unreasonable harm would occur to surrounding properties in terms of loss of outlook or privacy. Furthermore, whilst the reduction in daylight to the flank wall windows of the ground floor flank windows of 1 Downing Close and plots 30-34 are noted, it is considered that these properties would remain to receive good daylight for an urban area. On balance, given the scale of the proposal and the urban nature of the site and surrounding area, officers opinion, the harm would be caused, is not outweighed by the other planning benefits of the proposal. Accordingly, the proposal is considered to generally comply with London Plan Policy 7.6, draft London Plan (2017) policy D1 and Policy DM1 of the DMP.

6.6 Townscape and Design Quality

Policy Background

- 6.6.1 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. These broad principles are carried through in the proposed policies D1 and D2 of the Draft London Plan (2017)
- 6.6.2 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 area of poor design extensions should respect their host building'.

- 6.6.3 Policies AAP3 and AAP4 of the Harrow and Wealdstone Area Action Plan 2013 seek to ensure that all development proposals achieve a high standard of design and layout. Development within all three sub areas of Wealdstone as set out in the AAP will be required to 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. This 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.
- 6.6.4 The detailed design considerations for the Kodak site (including the Zoom Leisure site) are set out under Site 2 allocation under Chapter 5 of the AAP. This sets out a comprehensive list of design considerations.
- 6.6.5 The proposed architectural design has evolved during intensive discussions with the applicant during pre-application discussions. Specifically, over a three month period, the applicant attended 3 design workshops and weekly progress meeting with the LPA and also presented the design evolution to external architects, at two design review panels. At each design workshop, the applicant's design team worked through issues raised during the first round of internal and external consultation to improve the design quality of the proposal. Both the LPA and design review panel consider the amended scheme to represent an improvement of the original submission presented in September 2016.
- 6.6.6 A full assessment of the proposed layout, appearance and design rationale of the amended scheme are discussed as follows:
- Site Layout & Access*
- 6.6.7 Whilst the proposal represents an increased density from the approved scheme, the proposed layout would maintain the key principles of the approved parameter plans.
- 6.6.8 As the proposed development seeks detailed planning permission, the proposal is not bound by the parameters of the outline consent (P/0873/14). Notwithstanding this, the proposal entirely retains the approved green link extending from Harrow View and the area of open space located adjacent to Headstone Manor Recreation Grounds (approximately 27,000sqm). The generous provision of green space within the development complies with the intentions of the site allocation and is considered to be a notable characteristic of the development.

- 6.6.9 As demonstrated, the proposed layout of the primary and secondary routes would remain as previously approved by the parameter plans and further detailed within the reserved matters approval (ref: P/2982/15). Specifically, the primary access point into the site would be from the existing four-arm roundabout on Harrow View. The secondary access point would be located to the north of the primary access, along Harrow View. Both of these routes would also provide pedestrian access to the site. The green link would provide the main link from Harrow View to Headstone Manor for both cyclists and pedestrians. Overall, the access to and from the site would be in line with the previous approval and as such, is considered acceptable.
- 6.6.10 The width of the primary roads would also generally follow the approved layout. Specifically, the roads in the central area of the site would include a width of 6.0m, with dedicated parking bays on both sides of the road (5.0m length) and 2.1m wide footways. It is noted that the Officer's report for the RM consent (ref: P/2982/15) concluded that the 6.0m road width would not prejudice the free flow of traffic and given that these routes would primarily serve the development itself (with no through access to surrounding roads), the layout of the access roads were considered acceptable. In this respect, and also considering the proposed layout meets the Council's design criteria (in terms of width) for residential streets, no concerns arise in this respect.
- 6.6.11 The vehicle crossing over the green link and the secondary / tertiary roads located in the southern section of the site demonstrate a reduced width. Specifically, the access over the green link includes a minimum width of 4.0m. Concerns were initially raised by the LPA in regards to the ability of emergency and service vehicles navigating these areas of the site. In response, the applicant has provided a swept path analysis demonstrating the vehicle tracking of a fire appliance. This analysis shows that an emergency vehicle would be able to access all areas of the intensified site. Accordingly, the road network is generally considered to be acceptable.
- 6.6.12 The approved shared access route running parallel to the southern side of the green link would also be retained within the proposal. This shared road would accommodate vehicular, pedestrian and cycle traffic. Whilst the applicant has indicated that this would be a shared surface, a 1.0m separate pedestrian walkway is provided parallel to the shared surface. Whilst it is noted that the proposed shared surface does not strictly comply with the Table 5 'Shared Surface' of the Harrow Street Design Guide, it is noted that the shared surface was previously approved within P/2982/15 at a width of 3.7m. In this respect, the proposal represents a 200mm increase to that previously approved. Whilst it is regrettable that the shared access has not been provided in line with Council recommendations, in the context of the previous permission, the proposed layout is accepted.

6.6.13 Notwithstanding the above, it is noted that the approved roads are not designed to adoptable standards. Specifically, during the Reserved Matters application, it was agreed between the Council's Highways Authority and the applicant that the roads would not be adopted. Whilst it would be the Council's preference for the proposed roads to meet adoptable standards, the subject application makes no further attempt to design roads to adoptable standards.

6.6.14 Whilst the proposal increases the amount of parking spaces, this has been accommodated through replacing the majority of the approved parallel parking with forward drive parking bays. Whilst this would increase the amount of hardstanding, it is considered that suitable landscaping would help to mitigate any visual impacts. Additional parking is also proposed within courtyard areas between buildings. On balance and subject to conditions, the proposed parking layout is acceptable.

Building Layout

6.6.15 Following pre-application discussions, the proposed blocks have been broken down into smaller buildings in order to reduce their bulk and massing and also to improve accessibility around the site. The revised footprints of the buildings are generally sited in similar locations to the approved development. However, owing to the replacement of the terraced houses with apartment blocks, the layout and space around the buildings has been amended to better accommodate the changes.

6.6.16 The proposal consists of 24 blocks which follow two typologies; rectilinear mansion blocks and 8 'villas' situated around the edge of the green space. The proposed layout of the blocks was detailed within the proposal section of this report.

6.6.17 In terms of the layout and siting of the proposed buildings, the key principles of the siting of buildings established within the previous approvals have been retained in the proposed development. Overall, the proposal is considered to create a strong frontage along Harrow View and a clear and consistent building line along the edge of the green link. The spatial, visual and physical relationship between the development on the edge of the green space and Headstone Manor has also been carefully considered.

6.6.18 The proposed buildings have been designed to front the street scenes. The previously approved minimum separation distances and relationships between the frontages of buildings have broadly been retained. Specifically, the primary route (from the round-about) maintains a separation distance between frontages of approximately 23m. The secondary routes generally maintain a distance of 21.0m, while the distances between the frontages along the green link exceed 39.0m. The proposed separation between the frontages is acceptable.

6.6.19 In some areas of the site, the proposed arrangement of the linear building typology creates semi private courtyards between internal elevations of the buildings. The minimum distances between internal walls of the courtyard blocks achieve a minimum separation distance of approximately 17.0m.

- 6.6.20 The proposal retains a 2.0m wide defensible zone between the elevations of the buildings and the pedestrian footways. Further details of this defensible planting area would be required by condition of approval. It is considered that this defensible space to the ground floor residential units would provide sufficient space and levels of privacy from the adjoining pedestrian footpath.
- 6.6.21 Overall, it is considered that the layout of the proposed development would be broadly consistent with the previous approval, which was considered to appropriately reflect the intent of the site allocation and AAP policies. For these reasons, Officers do not object to the layout being proposed.

Scale, Height and Massing

- 6.6.22 The surrounding area to the north and south of the site has a strong suburban character. Pinner Park Avenue and Holmwood Close, located to the north / north-west, primarily consist of large two-storey semi-detached properties situated on generous plots. Residential development to the south of the site includes semi-detached and terraced properties, as well as a part three storey / part four storey apartment block fronting Harrow View.
- 6.6.23 In addition to the above and as noted elsewhere in this report, the application site and Harrow View East (Kodak Factory site) form part of the Kodak masterplan area, which is included as site allocation 2 within the AAP. Whilst the AAP identified maximum heights of 2-3 storeys for the Zoom Leisure site and 1-6 storeys for the Kodak Factory site, these designations precede the designation of the area as an Opportunity Area and Housing Zone. Nonetheless, the intentions of the site allocations and the future development at Harrow View East are considered to form a material consideration when assessing the suitability of the character, scale and massing of the proposal within the surrounding area.
- 6.6.24 In consideration of the proposed development, it is worth noting that in 2015 an intensified outline permission was granted for the Kodak Factory Site (P/2165/15.) Accordingly, whilst the AAP site allocation indicated that building heights on the Kodak site should range from 1-6 storeys, the intensified approval included heights up to 12 storeys. Development along Harrow View ranges in height from 2-6 storeys. Within the Officer's report it was acknowledged that the intensified proposal would remarkably change the townscape in the area by bringing forward a scale of buildings that would be double in height than that approved in the extant permission. Nonetheless, Officers considered the proposal to respond to the allocation of the site within the opportunity and a housing zone. The increased heights on the Kodak Factory site form a material consideration within the assessment of the subject application.

- 6.6.25 Similar to the intensified outline permission at the Kodak Factory Site (P/2165/15), the subject application seeks to increase density and building heights, from that previously approved by the outline consent. Specifically, the reserved matters approval was bound by the outline consent which limited the buildings to 3 storeys (maximum height of 15m) with two sections fronting Harrow View permitted to go to four storeys (maximum height 20m). It is noted that the 4 storey apartment block fronting Harrow View is currently under construction. This building has an approved height of 11.5m (approximate).
- 6.6.26 One of the significant changes between the approved development and the proposal is the replacement of the 2 and 3 storey dwelling houses and 4 storey apartment blocks with 4 to 6 storey apartment blocks.
- 6.6.27 In September 2016, the intensified scheme was submitted which included 24 x 4 storey apartment buildings. Officers and surrounding residents raised concerns regarding the lack of visual interest resulting from the uniform building height and the bulk of the buildings resulting from the excessive lengths of the elevations. In response to these concerns, the LPA and the applicant engaged in design workshops to explore different options to reconfigure the massing and building heights across the site.
- 6.6.28 Overall, the revised design has attempted to break up the monotony of the initial scheme by introducing a variety of heights, types of block and roof form. The resultant scheme consists of two building typologies, a 'villa' style and linear mansion blocks. This has been a positive change, and there is a clearer rationale behind the location of the different typologies. The linear mansion blocks have been simplified and are situated in the more urban part of the site, adjacent to Harrow View. These blocks, ranging in height from 3 to 6 storeys, follow a simple contemporary form, incorporating flat roofs and recessed balconies. Following comments from the DRP, the villa typology has been developed in response to the unique location of these blocks on the edge of the greenspace, within the setting of Headstone Manor. The villas to the Headstone Manor edge provide more generous corner units to this part of the site, and present a defined yet permeable edge to the park. The character, appearance and massing of these buildings is notably different to the remaining blocks.
- 6.6.29 The scale and massing of the two building typologies is discussed further below:
- Linear Mansion Blocks:
- 6.6.30 As demonstrated on drawing 15.101.105 rev 39 the linear mansion blocks range in height from 3 to 6 storeys. The applicant was encouraged to explore a variation in building heights and roof form to address the monotonous scale and appearance of the initial proposal of 4 storey blocks.

- 6.6.31 Whilst it is noted that the transition from two-storey semi-detached houses on Edward Road to three and four storey blocks of flats within the southern part of the development would inevitably represent a distinctive change in the character of the surrounding area, the scale and massing of the proposal in this location has been carefully considered to respond to the sensitive relationship with the properties on Edward Road. Specifically, Block H of the proposed development is the lowest in height at part three, part four storeys. The step in the building height provides articulation and softens the bulk of this part of the building when viewed from Edward Road. The depth and siting of this block also takes reference from the scale of these properties. Overall, it is considered that the height and massing of this block has been appropriately designed.
- 6.6.32 The linear mansion blocks on the southern side of the green link are four storeys in height, with the exception of the 'L-shaped' block on the corner of Harrow View which extends to 6 storeys. Following discussions with the applicant, the length of the proposed blocks have been broken down into smaller blocks. This amendment is considered to reduce the overall bulk and massing of the blocks, whilst maintaining a strong and legible edge to the green link.
- 6.6.33 The bulk of the massing has been provided centrally within the site and along Harrow View. The central urban space includes buildings ranging in height from 4 to 6 storeys. In line with the comments from the DRP, a more fluid approach has been taken to redistribute the six storey elements within the central urban space. This approach provides some articulation within this group of buildings. Overall, the height, scale and massing of the central urban area is considered to be appropriate and would result in legible frontages to roads and the northern side of the green link.
- 6.6.34 In terms of the frontage to Harrow View, linear Blocks J and S would be the largest blocks in terms of height and scale. It is noted that the height along Harrow View has increased from 3 / 4 storeys (maximum height 11.5m) to part four / six storeys (19.6m). When considering the impact of this on the surrounding area, it is worth noting that the existing and planned development along Harrow View is mixed in character and scale, ranging in height from 2-4 storeys. Furthermore, the Kodak site, which adjoins the opposite side of Harrow View, has been designated with maximum heights of 6 storeys. Accordingly, whilst it is acknowledged that at 6 storeys, the proposed height would exceed the existing heights within the surrounding context; overall, the development scale and height along Harrow View would sit comfortably within the existing mixed character and the forthcoming development at Harrow View East and would have comparable levels of scale and massing.

Villas (Blocks G, F, P, Q, U, V, W, X):

- 6.6.35 The villa typology has been developed in response to the unique location of these blocks on the edge of the green space, within the setting of the adjacent Headstone Manor. The DRP indicated that particular attention was required to the villa type to ensure a noticeable difference to the linear mansion blocks. The final proposal includes two versions of the villa, an L shape and a square, both with oblique-pitched roof.
- 6.6.36 Overall, the height and massing of the villas is considered to appropriately relate to their location on the edge of the green. When considered in comparison to the extant permission, the proposal seeks to open-up the space between the buildings, to extend the amenity areas into the more urban parts of the site. Whilst this arrangement is appropriate, both the DRP and the Council's Landscape Officer consider that further thought is required in regards to the transitional space between the villas. Both specialists consider that areas of densely planted trees behind the villas would help with the transition between the more urban centre of the site and the park.
- 6.6.37 In terms of height, the proposed villas would be four storeys with a pitched roof. During pre-application discussion, the applicant was encouraged to draw upon cues from Headstone Manor to create a building that not only distinguishes from the linear blocks, but also draws upon the setting with Headstone Manor. Whilst the overall height of these buildings is accepted, final comments from the Council's Urban Design Officer indicate that the architecture of the 'villa' type lacks finesse, particularly the roof form. Whilst it is considered that the overall design of the villas represents a missed opportunity to provide a high quality designed building within a unique setting, on balance, the villas are a welcome departure from the relative uniformity of the remainder of the site, and the scale is well judged in relation to this sensitive setting adjacent to Headstone Manor. Overall, these blocks offer a good standard of accommodation on the park edge.
- 6.6.38 As discussed, the variation in height and massing across the site was required to provide a degree of visual interest to the simplistic design of the proposed blocks. The variation in height and massing has been considered to ensure the bulk of the massing would be located in the central urban area of the site or along Harrow View. This is considered to be an appropriate approach. Nonetheless, it is acknowledged that the proposed development would give rise to a significant contrast in scale within the surrounding area. However, it is considered that these potential local adverse impacts must be weighed against all other relevant material planning considerations, including making effective use of brownfield land as well as the site's location within the Opportunity Area and Heart of Harrow Housing Zone.

Standard of Architectural Design

- 6.6.39 Two Design Review Panels (DRP's) were convened during the course of the planning application. The purpose of these DRP's was to enable a panel of experts to consider the scheme and to provide officers with their opinion on the design quality of the proposed development.
- 6.6.40 During the first DRP the panel recognized the challenge the site presents in terms of the transition between town and country and metroland development to higher density urban grain. The DRP indicated that the site was a large project for one architect and as such, it is vital that a robustly designed group of building types is developed. As previously discussed, the proposed development underwent a significant redesign following the first consultation.
- 6.6.41 The revised design was presented at a second DRP in March 2017. Whilst the DRP confirmed that some progress has been made since the first review, there was still considerably more work required in order to develop a high quality scheme for this important site. Overall, more architectural variety was required. The panel indicated that the buildings should respond to the different edges of the site; entrances and cores needed to be clearly defined throughout; roof form needed further development and the stepped blocks should respond to the spatial hierarchy of the site.
- 6.6.42 Whilst the applicant has sought to respond to the different edges and areas of the site through variation in architectural form, this is only evident in terms of the villas, which create an edge to the green space. With the exception of the villas, the proposed blocks follow a simple rectangular block form. Nonetheless, the applicant has indicated that the elevation treatments of the blocks have been studied and thought-out to produce subtle differences based on their location and setting within the site.
- 6.6.43 Overall, the proposed elevations are repetitive, but are generally well organised with consistently proportioned windows and recessed balconies. The walls would be simple in terms of their architectural expression, with clear simple lines. There is some articulation to the façades of the blocks by way of brick banding. Specifically, it is proposed to include recessed brickwork to provide articulation to the building in terms of emphasising the verticality of the built form. All windows and balconies would be recessed to provide an appropriate reveal. A condition of approval would require further details in regards to the depth and detailing of window reveals.

- 6.6.44 The hierarchy of entrances is not always clear; in some instances private entrances appear more prominent than communal ones. The design of the ground floor elevation has been generally improved though the use of a darker brick helps to tie it together and ground the buildings. Notwithstanding this, further consideration is required in terms of the site wide entrance / door strategy. Overall it is considered that the lack of consistency dilutes the prominence and definition of the entrances. In this respect, it is considered necessary to attach a condition of approval requiring further consideration of the entrance strategy across the site.
- 6.6.45 A materials strategy for the proposed development has been submitted. Given the uniformity and lack of architectural variation across the development site, the LPA consider that the success of the buildings is reliant on the use of high quality materials and details. The use of good quality, well-detailed bricks are vital. Accordingly, a planning obligation would require further detail in this respect.
- 6.6.46 The applicant seeks to use two tones of brick throughout the development. The first brick, a light buff brick was utilised within the first phase of development. The use of this brick is considered appropriate to link the two developments together. Whilst the second brick has not yet been agreed, the LPA have recommended a contrasting dark brick would be appropriate to create variation within specific zones of the development. Whilst the applicant has proposed the use of uPVC frames, similar to that approved within the first phase, the LPA consider that the use of high quality aluminium frames would ensure that the clean, simple lines of the building are successfully achieved.
- 6.6.47 The proposed CGIs and coloured elevations demonstrate how the use of the two tones of brick could be utilised to provide visual articulation to the buildings. The proposal plans utilise the different toned bricks at the ground and upper levels of the building, to break up the massing of the larger blocks. Whilst this is considered to be a successful approach in reducing bulk, the distribution / application of the brick requires further consideration. Overall, it is considered that the use of high quality materials, two toned bricks and high quality detailing would improve the simple, uniform elevations. Accordingly, a condition of approval would require the approval of materials and the application of the proposed materials and detailing to be approved prior to construction.
- 6.6.48 Final comment from the Council's Urban Design Officer indicates that there are still some elements of the scheme that would benefit from further resolution through conditions of approval. Whilst the proposal is not considered to represent an exemplar of high quality architecture, on balance, the proposal is acceptable in design terms. The architectural quality of the proposal has improved during the course of the application and the design team has attempted to respond to the major points raised by the design review panel. Notwithstanding this, the LPA consider it necessary to require the submission of a design code as part of the legal agreement.

Landscaping and Open Space

Retention of the green link and area of open space:

- 6.6.49 As detailed within The Harrow and Wealdstone Area Action Plan, a key objective for allocated site 2 is to secure an open space link between Wealdstone town centre and Headstone Manor, including the creation of a physical and visual open space corridor from Harrow View through to the Headstone Manor complex.
- 6.6.50 The applicant is proposing to deliver the previously approved green link from Harrow View and the area of open space located adjacent to Headstone Manor within the current application. This approved area of open space (27,185sqm) equates to approximately 34% of the total site area. No alterations are proposed to the location or scale of the green link or open space. For this reason, the area has been omitted from the red site outline. Notwithstanding this, the current proposal intends to upgrade the green link and green space to reflect the higher density of the proposal. Whilst the broad principles of the relandscaping have been provided within this application, the specific detail will be addressed through a condition of approval.

Proposed Landscape Strategy:

- 6.6.51 In addition to the approved provision of public open space, the current proposal introduces internal courtyard amenity spaces and additional communal grounds, located between the villas on the edge of the green. These internal courtyard amenity spaces would be shared private spaces. Submitted drawing 1002 Rev B, prepared by RPS, demonstrates that the proposed areas of public and shared open space within the development site now equates to 28,100sqm, a 35.5% proportion of the site.
- 6.6.52 Whilst the inclusion of courtyard areas between Blocks R, S and T and between Blocks J, K, L and M is supported, the Council's Landscape Officer considers that these areas could be improved by making the paces more intimate. Specially, the courtyards should be designed to increase use and to create a place where residents can feel comfortable, safe and secure, without the feeling of being overlooked. The courtyards should also provide an attractive and functional pedestrian route through, without the hard surfaced footpath network dominating the space. In this respect, more soft green tree and shrub planting is required. The expanse of proposed grass areas in the northern courtyard should be reduced and replaced with soft landscape planting. Accordingly, whilst the concept of the courtyards is welcomed, further detail is required to ensure the space is designed in line with the above principles. In this respect, a condition of approval would require further details, including a planting plan and separate landscape strategy, for the courtyard areas.

- 6.6.53 Similarly, whilst the inclusion of the pocket parks, informal amenity areas and the pedestrian walkway between the proposed villas are welcomed additions to the proposal, there are particular concerns regarding the excessive provision of hard surfacing across the site. Officer's acknowledged that, in some areas, the proposed hard standing differs to parking areas and roads and is used to create a transitional area between the open space and the more urban areas of the site. Notwithstanding this, the Council's Landscape Officer and the DRP consider that these areas of hard landscaping could be improved through the greater provision of shrubs and trees. This is particularly evident between Blocks V and U and between Blocks Q and P. The DRP advised that the more densely planted trees behind the villas would help with the transition between the more urban centre of the site and the park.
- 6.6.54 In addition to this, there are lines of parking spaces with an insufficient number of trees to break up and soften the parked cars and hard surfacing. This is of particular concern given the significant provision of on-street parking proposed. In line with the RM consent, trees should be proposed every 4 or 5 cars spaces.
- 6.6.55 Accordingly, the proposed landscape strategy includes areas where hard surfacing dominates and more soft landscape should be proposed for street scene impact and to enhance the biodiversity of the area. Accordingly, the enhanced provision of planting should be addressed throughout the site, by a condition of approval.
- 6.6.56 Further detail is required for some of the new features such as the pergolas and raised beds. Detailed cross sections and elevations should be included to help explain the detail. A condition of approval would be attached in this respect.
- 6.6.57 Whilst the applicant has provided a Landscape Management Plan, this document provides an approximating the upkeep that would be expected on the site. The detailed management arrangement and frequencies would be agreed by way of condition. It is further noted that due to the large area of public open space within the site, a planning obligation would be included within the legal agreement to ensure the management company engages with the Council in matters associated with the management and maintenance of these public areas. The legal agreement would also require the green link and open space to remain open to the members of the public and for pedestrian and cycle right of way to be maintained from Harrow View to Headstone Manor.

Conclusion on Townscape Design

6.6.58 The proposed site layout and siting of buildings is generally consistent with the consented scheme. Whilst the proposal represents an overall increase in scale on balance, the proposed heights and massing are considered acceptable in the context of the future development within the area and when considering the designation of the site within the housing zone. Whilst it is acknowledged that the adopted design rationale is simple and repetitive, the Council's Urban Design Officer has confirmed that the proposed architectural design is acceptable and refusal of the planning application for this reason would not be justified. Notwithstanding this, further details are required in regards to the detailing and materials to ensure variation and a good quality finish on the buildings. On balance, 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.

6.7 Lifetime Neighbourhoods

Secured By Design

6.7.1 Policy 7.3 of The London Plan (2016) and core policy CS1 E of the Harrow Core Strategy 2012 seek to ensure that developments should address security issues and provide safe and secure environments. This is also reflected in policy D1 of the Draft London Plan (2017).

6.7.2 The application is accompanied by a Secured By Design Statement and it is noted that the applicants have reviewed their proposal with the Designing Out Crime Officer. This statement provides a list of Secured by Design targets which would be achieved, in regards to the design and layout of the proposal. Whilst these targets have been listed, at this time, the applicant has not demonstrated how each target would be met. The statement indicates that the development would achieve a Secured by Design certificate of bronze.

6.7.4 In terms of creating a safe and secure public realm, officers consider that there is strong potential for pedestrian activity through the site and indeed this would be encouraged. It is envisaged that the enhanced residential use, generous provision of open space, including dedicated play such as the MUGA and access to Headstone Manor Recreation Grounds would generate a high level of daytime/evening activity within the development. Given the nature of the development site, public pedestrian and cycle routes to the site and through to Headstone Manor, would remain open to the public at all times.

6.7.5 The layout and nature of the proposed development is such that street network and the new public realm areas would be overlooked by the new flats and would be activated at ground, providing high levels of natural surveillance. Furthermore, it is considered that a high quality landscape strategy, details of which are to be approved by condition, would ensure that the streets and areas of public open space would be attractive and active areas within the site, which create a sense of community.

- 6.7.6 Whilst much of the public realm, such as the green link and area of open space, remains as previously approved, the proposed development introduces additional shared amenity spaces. Given the nature of these spaces, in accordance with Policy DM2A.b, access to these areas would not be gated. Given the semi-enclosed nature of this area and the extremely high levels of natural surveillance, which would occur, from ground floor flats and upper floor flats, officers do not raise any concerns in regards to the security of the users of the potential for anti-social behaviour.
- 6.7.7 Whilst the parking spaces would predominantly be provided along the roads, some spaces are located in semi-undercroft areas at the rear of buildings S and J. It is noted that these spaces are double length spaces. Whilst officers previously raised concern regarding the space created by the arrangement of these parking spaces, the MET police officer did not comment on this within his response. Accordingly, Officers assume that the proposed layout would be capable of achieving SBD certification, subject to the appropriate lighting which can be controlled via a Car Park Management Plan which may be required as a condition of any planning permission.
- 6.7.8 Central to this vision of creating safe and attractive areas of public realm and shared communal areas within the development site is the inclusion of appropriate, ambient lighting, which would assist to create a secure and inviting space, whilst not having a harmful impact to surrounding residents. The applicant has provided an indicative lighting layout but has not provided a lighting strategy to support this. Nonetheless, it is considered that a detailed lighting strategy for the entire site can be secured by way of an appropriately worded planning condition.
- 6.7.9 Furthermore, it is considered that the management and maintenance of the public and private realm would also be central to ensuring a safe and secure environment for future residents and member of the public. The management of this space would be secured by condition. It is further noted that due to the large area of public open space within the site, a planning obligation would be included within the legal agreement to ensure the management company engages with the Council in matters associated with the management and maintenance of these public areas.
- 6.7.10 In terms of creating a secure environment for the future occupiers, the ground floor flats have been designed with landscaped defensible areas to ensure both security and privacy. The dedicated playspaces would enjoy natural surveillance from the surrounding upper floor residential properties. This is considered to be acceptable.

- 6.7.11 The applicant has not provided specific details relating to the functioning of the buildings, such as the types of windows and doors, or the entry and access systems to the buildings and the mail delivery system. It is noted that the proposed development is capable of complying with these SBD requirements in this respect, but that some further detail is required from the application. A suitable condition is therefore recommended as set out at the end of this report to ensure that the development will achieve Secured by Design certification prior to occupation.
- 6.7.12 The Designing out Crime officer has responded to the consultation process. Whilst objections to the proposal have not been raised, the officer has indicated that the minimum expectation would be a silver SBD award for a new development, not bronze as indicated on the applicant's statement. Specifically, it is noted that a bronze award generally relates to refurbishments or conversions and as such, would not be suitable for the proposed development. The SBD officer highlights that the development should be considered in context of the Harrow View East development and that the consistency of the security across the wider Kodak site is required to ensure that no potential hot spots or areas of weaknesses are created in the future.
- 6.7.13 As discussed above, the proposed development generally demonstrates compliance with Secure by Design; Designing out Crime principles. Whilst specific design details relating to SBD have not been provided, it is considered that these details can be secured by way of condition. Specifically, a planning condition would require the proposal to achieve Secured by Design certification (silver or gold) from the MET Police, prior to the occupation of the development. Accordingly, subject to this condition and further conditions relating to maintenance, landscaping and lighting, the proposed development is considered to provide a safe and secure environment for future occupiers and members of the public, in accordance with Policy 7.3 of The London Plan.

Accessibility and Inclusivity

- 6.7.14 Policy 3.8.c of the London Plan (2016) requires 'ninety per cent of new housing meets Building Regulation requirement M4 (2) 'accessible and adaptable dwellings'. Criterion d requires 'ten per cent of new housing meets Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. This is carried through in the Draft London plan Policy D5. The submitted application documents advise that 49 units distributed between Blocks A, H, J, M, N, R and S are proposed as 'wheelchair user dwellings', and are designed to be easily adaptable for residents who are wheelchair users. This would equate to 11.5 per cent of the proposed 425 homes. 90 per cent of the proposed units would meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings'. A condition is recommended requiring the internal layout of the buildings and its external spaces to meet these standards. Subject to this condition, officers consider that the proposed development would comply with the policies outlined above.

- 6.7.15 The 49 Wheelchair User Dwellings would be provided across all three tenures (market housing, shared ownership, affordable rent).
- 6.7.16 Generally, the proposed breakdown of the wheelchair units across the affordable housing tenure is considered to be acceptable and in line with Council requirements. Specifically, the proposal would provide 2 x 2bed 4 person and 9 x 3bed 5 person wheelchair user dwellings within the affordable rented tenure and 4 x 2bed 4 person and 2 x 3bed 5 person wheelchair user dwellings as shared ownership.
- 6.7.17 10% of all spaces will provide adequate parking for disabled people, distributed around the development, close to building entrances. This provision would be secured within the Parking Management Plan.
- 6.7.18 Subject to various planning conditions, it is considered that the proposed development would be inclusive and accessible to future residents and visitors alike. By providing a mix of homes suitable for occupation throughout the life cycle, together with a proportion of homes suitable for wheelchair users, and a new physical connection between Harrow View and Headstone Manor Recreation Grounds, the development would contribute to the creation of a lifetime neighbourhood and a balanced community.

6.8 Impact on Heritage Assets and Protected Views

Policy Context

- 6.8.1 Paragraph 129 of the NPPF states that 'local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise'.
- 6.8.2 Policy CS1 of the Core Strategy states that 'proposals that would harm the significance of heritage assets including their setting will be resisted. The enhancement of heritage assets will be supported and encouraged'.
- 6.8.3 Policy AAP8 of the AAP seeks to ensure that development proposals within the Heart of Harrow should enhance the setting of the Harrow on the Hill Area of Special Character, by amongst other things, contributing to the formation of an urban silhouette that adds interest to the skyline in long range views to and from Harrow Hill and not adversely affecting views of or from Harrow Hill and St Mary's Church. The AAP identifies a number of protected views within the area.

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

- 6.8.4 The application has been accompanied by a Heritage Statement Addendum.

- 6.8.5 The application site does not fall within a landmark viewing corridor. However, it does lie within a Wider Setting Consultation Area of the Old Redding open space, which provides a long distance panorama across central London. Most notably Harrow on the Hill and St Mary's Church are key views from this open space. As the application site does not lie in the view itself, the assessment concludes that the proposal is unlikely to have any significant effect on this view.
- 6.8.6 The LPA note that the application site lies to the west of the Kodak Factory site. As previously mentioned, this site is currently occupied by a number of large, bulky industrial buildings, some of which are 37 metres high. Furthermore, the redevelopment of the Kodak site includes approved heights up to 12 storeys.
- 6.8.7 The changes to the landscape panorama associated with the form of development outlined would not erode the fundamental qualities of the wider setting the Old Redding. The scale and development typologies would instead reflect the sites strategic location, within the Heart of Harrow AAP area, but also close to Headstone Manor and the suburban housing areas that surround it. Accordingly, the proposal would accord with policy AAP8 of the AAP in respect to views.

Impact on Headstone Manor

- 6.8.8 Grade I listed, Headstone Manor is one of the most historically important vernacular buildings in Greater London and is the earliest known timber frames house in Middlesex. It sits on the site of a Scheduled Ancient Monument (SAM) within a complex Grade II* AND Grade II listed buildings.
- 6.8.9 Headstone Manor was formerly the centre of a large farmland setting which has gradually been eroded to be a small pocket of open space within suburban surroundings. The surrounding open land and the sheltered character of the Manor complex therefore helps to retain its agricultural character.
- 6.8.10 Headstone Manor adjoins the western boundary of the application site. At present, due to the site configuration, distance and presence of some vegetation, the Manor House cannot be seen at ground level from any area of the site.
- 6.8.11 Given the location of Headstone Manor to the west of the application site, the proposed buildings located adjacent to the western boundary and around the perimeter of the open space have the greatest potential to impact upon the setting of Headstone Manor. In order to assess the impact of the proposed intensified development on the setting of the adjacent Heritage Asset, it is necessary to refer to the approved scale and layout of RM consent P/2982/15, which forms a baseline for the townscape and visual appraisal.

- 6.8.12 When considering the difference between the approved and proposed footprints and siting of the proposed buildings around the green space, it is noted that the proposed layout would replace rows of terrace and semi-detached houses with 8 apartment buildings. Notwithstanding this change, the siting of the apartment buildings generally follows that of the approved housing and as such, the approved sight lines from Headstone Manor would be retained. In addition to this, the proposal for apartment blocks further breaks down the massing of the approved buildings and allows further pedestrian permeability from the open space through to the more urban parts of the site. This breaking up of the massing of the approved buildings is considered to enhance the permeability and views from Headstone Manor through the site.
- 6.8.13 In the context of the above, any potential impact on the setting of Headstone Manor would be related to the increase in building heights across the site and associated changes in architectural design.
- 6.8.14 During the first round of consultation, both Historic England and the Council's Conservation Officer indicated that no key views were provided, making a full assessment of the harm difficult. Notwithstanding this, the mitigation / justification provided was not considered sufficient.
- 6.8.15 Following these initial objections, the applicant engaged in discussion with Historic England. In response to these discussions, the applicant provided a revised Heritage Impact Assessment and addendum to the Heritage Statement (approved within RM consent). The following wireline assessments were provided within this revised study:
- the farm yard between the Grade II* listed barn and Grade II listed outbuilding;
 - the field to the north of the Grade II* listed barn
 - the bridge over the moat; and,
 - the island itself, immediately to the east of the Manor House
- 6.8.16 Historic England provided further comment in December 2017, during the third round of consultation. This response confirms that the submitted wireline study adequately addresses the previous request for further information.
- 6.8.17 The assessment concludes that the proposed development would not be visible in views of the approach from the west towards the Headstone Manor complex (views 11, 13 and 14). However, the development would be clearly visible above the existing treeline in views from the field immediately to the north of the Grade II listed Tithe Barn (view 12). Accordingly, the development would cause some harm to the significance of the Headstone Manor complex by encroaching on its relatively secluded setting.
- 6.8.19 Whilst this potential for harm to the setting of the Grade II listed Barn is acknowledged, the LPA consider that this degree of harm is justified and appropriately balanced by the delivery of public benefits (Para 134, NPPF).

- 6.8.20 As previously discussed, the Mayor of London has identified the application site for its potential in accommodating higher density residential development (evidenced by the designation as an Opportunity Area and Housing Zone). This is further reflected in the intent of Site Allocation 2 within the AAP. In addition to these designations, when assessing the harm of the proposal, it is necessary to refer to the RM consent, which is considered to be a fallback position. In this context, any harm to the Grade II listed Barn must be judged against the desirability of securing an appropriate residential density of development on this allocated, previously developed site.
- 6.8.21 Given the retention of the large area of open space adjacent to Headstone Manor, the acceptable heights of the proposal and the context of the site within the wider Kodak masterplan area, any harm resulting from the proposal is not considered to be unjustifiable. Furthermore, whilst the proposal would contribute towards the housing agenda within Harrow, there would also be wider impacts within the community as a result of the areas of open space, dedicated play areas and improved connectivity from Harrow view to the Headstone Manor complex. Specifically, whilst there is currently no through access from Harrow View to Headstone Manor, the proposal would retain the previously approved green link from Harrow View, leading to an area of open space located adjacent to Headstone Manor grounds. As shown on the proposed landscape strategy, these areas of open space would provide pedestrian and cycle routes to Headstone Manor. Accordingly, on balance, it is officers opinion that the delivery of public benefits associated with the proposal appropriately balances and justifies any harm to the grade II Listed Tithe Barn, in accordance with paragraph 134 of the NPPF.
- 6.8.22 Historic England have requested a condition of approval to ensure the historic hedgerow would be retained and that additional planting along the western boundary would be undertaken to improve the screening of the development from Headstone Manor. This requirement for additional planting would be incorporated within the landscaping condition.

6.9 Highways, Traffic, Parking and Servicing

- 6.9.1 The NPPF requires proposals that would generate significant amounts of movement to be supported by a Transport Assessment and to provide a Travel Plan. A Transport Assessment (TA) and Travel Plan have been submitted in support of the planning application. Each of these documents were updated during the course of the planning application, following concerns raised by the Local Highways Authority and by Transport for London (TFL).

- 6.9.2 London Plan Policy 6.3 Assessing Effects on Development on Transport Capacity requires the impact of proposals on transport capacity and the transport network to be assessed, and states that development should not adversely affect safety on the transport network. This principle is carried through to the proposed policy T4 in the Draft London Plan (2017). In addition to Transport Assessments and Travel Plans, the policy goes on to call for construction logistics plans and delivery & servicing plans to be secured. Policy 6.10 Walking seeks high quality pedestrian environments within development proposals. Local Plan Policy AAP 19 Transport, Parking and Access within the Heart of Harrow requires all major development to prioritise access by sustainable modes, with particular emphasis on the provision of safe and attractive walking routes to facilities and public transport.
- 6.9.3 The application site is located immediately west of Harrow View (A4008), a single carriageway road running in a north west to south west direction, providing connections to Harrow Town Centre to the south and Watford / the M1 to the north. The nearest bus stops (Kodak Sports Ground and Pinner Park Avenue) are located adjacent to the site along Harrow View. Services that operate from these stops include route H9, H10 and H14. Harrow and Wealdstone and Headstone Lane Stations are located approximately 1.4km and 1.0km south east and north west of the site. Overall, the application site has a Public Transport Access Level (PTAL) of 1b or 2, which is equivalent to a low accessibility.

Access and Internal Road Network

- 6.9.4 As noted, the proposed primary and secondary access routes would remain as previously approved by the parameter plans and further detailed within the reserved matters approval (ref: P/2982/15). Specifically, the primary access point into the site would be from the existing four-arm roundabout on Harrow View. The secondary access point would be located to the north of the primary access, along Harrow View. These works were previously agreed within the reserved matters approval.
- 6.9.5 A full description of the proposed internal road network has been assessed within the 'layout' section of this appraisal. It is noted that the layout of the roads would generally follow the approved layout. Whilst the proposed layout results in various dead-ends, the design has been amended throughout the application to ensure that sufficient turning areas have been provided. In this respect and also considering that the proposed dead-end roads are located on the southern side of the greenlink or within courtyards, which are areas that are expected to have a low flow of vehicular traffic, on balance, the layout is accepted. Accordingly, whilst the LPA consider that the flow of traffic throughout the development site could have been better managed through the replacement of dead-end roads with connecting / ring roads, given the current application maintains the principles of the previously approved layout and only seeks minor alterations to some of the secondary and tertiary roads, no objections are raised.

- 6.9.6 The Council's Highways Authority confirmed that the roads approved within the reserved matters application were not designed to adoptable standards. Given the proposed layout generally conforms to that previously approved, the Council's Highways department maintains the previous position regarding the adoption of the roads. In this respect, the maintenance, signage and lighting of the proposed road network would be the responsibility of the developer. Whilst the LPA consider the proposed application represents a missed opportunity to improve the road layout to achieve adoption, given this position was previously agreed within the reserved matters consent, no objections are raised.

Highways and Public Transport

- 6.9.7 The application site is located within an area of low public transport accessibility (PTAL 1b or 2). Harrow and Wealdstone Station is located approximately 1.4km south east of the site, approximately a 17 minute walk.
- 6.9.8 Harrow and Wealdstone Station, on the Bakerloo Line, has trains running on average every 6-8 minutes. This station is also served by London Midland, Southern Rail and London Overground services. Headstone Lane Station is served by the London Overground Service, operating a frequency of every 10-15 minutes. Headstone Rail Station provides access to Watford Junction to the north and Euston Station to the south.
- 6.9.9 TFL and the Local Highways Authority raised queries regarding the methodology used to calculate trip generation within the original Transport Assessment. Specifically, TFL did not agree with the methodology employed to estimate the vehicular trip generation nor the conclusions that suggest that all the local highways would operate within capacity post-development. TFL indicated that the transport assessment must cover the cumulative impact of the total number of units that would be approved on the site. TFL indicated that this is also important to correctly reflect the demand on public transport resulting from the development. Further queries were raised in regards to the inappropriate TRICS data that was used to inform the calculations. Overall, the Transport Assessment was considered to vastly under-estimate the level of impact of the development. These concerns were supported by the Local Highways Authority. In response to these comments, the applicant submitted a revised Transport Assessment prepared by PFA Consulting, dated October 2017. TFL were reconsulted in November 2017.
- 6.9.10 Whilst the applicant provided a revised Transport Assessment in November 2017, TFL maintained their previous concerns regarding the modelling. Whilst TFL considered it regrettable that the revised TA made no changes to the trip rate assessment, given TFL's own modelling it was unlikely that there would be any adverse impact. Whilst TFL were still not in agreement with specific details within the applicant's final TA, subject to financial contributions, TFL have not objected to the proposal.

- 6.9.11 Notwithstanding the findings of the TA, it is noted that the RM Consent secured various financial contributions towards highways works, to mitigate the impact of the approved development. This included a £1 million contribution towards the upgrade to the Goodwill to All Junction. Despite the aforementioned inaccuracies in capturing the trips generated by the site, the Local Highways Authority has confirmed that the previous financial contributions towards highways upgrades are sufficient to support the increase in vehicular trips associated with the proposed development. As such, no further contributions are required in this respect.
- 6.9.12 In terms of bus services, three bus routes currently serve the development. Various concerns have been received from surrounding residents regarding the capacity of these routes to accommodate the proposed increase in density. Specific concern was raised in regards to the H14 bus route, which was considered to currently be at capacity. The Council's Highways Officer also considers that the main impact of the proposed development would be on sustainable modes of transport.
- 6.9.13 In terms of public transport, given that TFL has found the modelling methodology and cumulative total units use inaccurate, TFL conducted their own analysis of the likely bus trips generated by the proposed development. This assessment was then used to estimate a level of funding required to secure additional public transport. TFL's working assumption estimate that in total around 30% of all new flats in the development would generate a new bus trip, or tube trip that states with a bus. This equates to 174 new bus trips. In support of the resident's concerns, TFL confirmed that the H14 route is already operating at the maximum level during peak hours.
- 6.9.14 Accordingly, the Council's Highways Authority and TFL agree that a financial contribution to mitigate the impacts on the bus services is required. TFL are seeking funds from this development to increase bus capacity in the area, at the estimated level of £95,000 per year for 5 years (£475,000). This would help to fund an additional return double decker journey in the peak periods and thus provide capacity for an additional 90 return trips. This contribution is considered to be necessary to provide a good service for both new and existing passengers. In this respect, the financial contribution (£475,000 - £75,000 already paid by the applicant) is required by a planning obligation.
- 6.9.15 Previous contributions proposed for bus countdown (£7,064) and bus stop improvements (£3,364) are secured within the previous legal agreement associated with the outline planning permission. The Council's Highways Officer has confirmed that no additional contributions are required in this respect.
- 6.9.16 No concern has been raised by TFL or London Underground, regarding the capacity of Harrow and Wealdstone Station in accommodating the proposed development.

Cycle and Car Parking Provision

- 6.9.17 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. This is carried through in policy T6 of the Draft London Plan (2017). 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-site parking, efficiency in land use and overall impact upon environment and the transport network.
- 6.9.18 Policy AAP19 of the AAP seeks to limit onsite 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 AAP20 (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 Green Travel Plan provisions.
- 6.9.19 Having regard to the fact that the site is located within an area with a low public transport accessibility level (PTAL 1, 2), within the reserved matters application it was considered that a higher level of parking spaces for the smaller units (i.e. 1 space per unit) could be supported. Specifically, the RM consent approved 442 spaces for 314 dwellings, resulting in a parking ratio of 1.4 cars per unit. The total number of spaces approved would not exceed the maximum standard set out in the London Plan. Whilst TfL considered the proposed provision to be high, at the time, it was considered that the level of parking would be required to ensure that there is no displacement parking by residents on to nearby residential roads.
- 6.9.20 The proposed development would provide 257 car parking spaces in the form of courtyard car parking and on-street car parking. The proposed provision would be in addition to the 184 spaces which would come forward as part of the first phase of development. A cumulative provision of 441 parking spaces would be provided across the wider Harrow View West site to serve the 567 residential dwellings. This equates to a ratio of 0.78 parking spaces per dwelling, in comparison to the ratio of 1.4 cars per unit previously approved.
- 6.9.21 As before, TfL expressed its preference for the total number of parking spaces to be capped at the previous lower consented scheme-wide level. TfL also recommended previously that consideration is given to car club space(s) as an alternative to dedicated parking spaces, particularly for the higher density flatted units where the public transport access is the highest.

- 6.9.22 Whilst TFL's concerns are acknowledged, conversely, surrounding residents consider the proposed provision of car parking to be low. Residents have concerns that the under provision of parking spaces across the site would result in parking displacement in surrounding streets.
- 6.9.23 Both of these opposing concerns have been taken into consideration within the assessment of the provision of parking spaces. Overall, it is noted that the proposal represents a reduction in the ratio of parking. This is considered to be acceptable given that the proposal replaces a large amount of family sized houses with smaller flats. Generally, it is considered that flat occupiers (1 and 2 bed) would have lower car ownership than larger families. Subject to a condition requiring the submission of a car parking management plan, on balance, the final intended parking provision across the site is considered to be adequate for the proposed tenure and occupancy of the development.
- 6.9.24 Whilst residents concerns regarding parking on surrounding streets are noted, the development is not within the extent of a CPZ (controlled parking zone), meaning that future residents would not be eligible for permits. In this respect, it is not necessary to permit restrict the proposed development.
- 6.9.25 The proposed development would provide a total of 1069 cycle spaces provided in safe and secure storage area on the ground floor of each residential block, representing a ratio of 2.5 cycle spaces per dwelling, in excess of the minimum standard set out in Table 6.3 of the London Plan. Whilst this is acceptable, TFL have raised concern regarding type of cycling parking proposed. TFL has requested that the design of the cycle parking is amended to provide a proportion of traditional Sheffield racks, in addition to the stacking racks proposed, which are accessible to all users and suitable for all styles of bikes. A condition is attached in this respect.
- 6.9.26 The Council's Travel Plan Coordinator (TPC) has reviewed the final version of the Travel Plan and the objectives and targets contained within. Whilst the Travel Plan is considered to be acceptable, the developer has not committed to paying a travel Plan Remedial Sum, which is repayable when targets are met after 5 years or is held and used if necessary for remedial measures. Whilst the reserved matters consent included a travel plan remedial sum of £16,820, an additional sum of £38,180 is required. This bond should be secured by section 106 obligations.
- 6.9.27 Concerns raised by neighbours in relation to traffic and parking congestion are acknowledged. However, having regard to the above mentioned planning conditions and s106 obligations, the proposed car parking and cycle parking provision is considered to be acceptable.

Walking / Cycling

- 6.9.28 London Plan Policies 6.9 Cycling and 6.13 Parking (policies T5 and T6 of the Draft London Plan) give effect to the London Plan cycle and vehicle parking standards, including requirements for electric vehicle charging points (ECPs), parking for 'blue badge' holders and for cycle parking in particular to be secure, integrated and accessible.
- 6.9.29 Policy AAP19 requires all major development proposals to prioritise access by sustainable modes, with particular emphasis on the provision of safe and attractive walking routes to nearby facilities and to public transport.
- 6.9.30 Pedestrian and cycle connectivity in and around the area is poor in particular to and from the railway from Harrow View. In this respect, the outline consent set broad principles for the green link which aims to provide a new connection from the south east corner of the site on Headstone Drive, through the Kodak site to Harrow View and forming a link to the green link which is to be delivered on the application site. This green link was proposed to accommodate new places and spaces for the public including cyclists.
- 6.9.31 The proposed layout of the primary and secondary routes and the green link would remain as previously approved by the parameter plans and further detailed within the reserved matters approval (ref: P/2982/15). Accordingly, pedestrian access to the site would be provided in 3 locations along Harrow View. The green link would however provide the main link from Harrow View to Headstone Manor for both cyclists and pedestrians. Overall, the access to and from the site would be in line with the previous approval and as such, is considered acceptable.
- 6.9.32 The previous approval included financial contributions of £2,523 towards signage and £45,414 towards pedestrian and cycle improvements.
- 6.9.33 Both TFL and the Council have expressed the importance of maintaining pedestrian and cycle access through the site to Headstone Manor grounds. Details of the access routes would be secured through the landscape condition. Further details of the management and maintenance of these connections, would also be required as a planning obligation, through the requirement for an open space management plan.
- 6.9.34 Further concerns were raised by TFL in regards to the analysis of the cycle routes that have been provided. Whilst TFL indicate that further analysis is required to determine the most appropriate locations for the cycle improvements, it is noted that the previous contribution was intended for cycle and pedestrian improvements along the green link. In line with TFL's comments, the LPA are requesting an additional £25,000 contribution towards cycle and pedestrian improvements to the Borough's cycle hub, including the proposed green link.

6.9.35 As stated earlier in this report, it is considered that the proposal would provide a high quality, inclusive and legible route within Wealdstone, which would increase pedestrian and cyclist permeability in the area. This in turn would strengthen the spatial definition of this part of Wealdstone, as required by the site allocation.

Refuse & Servicing

6.9.36 London Plan Policy 5.3 Sustainable Design and Construction requires development to minimise the generation of waste and maximise reuse or recycling. This is reflected in policy S17 of the Draft London Plan (2017). These sentiments are echoed in Core Strategy Policy CS1. Local Plan Policy DM45 Waste Management requires proposals to make waste management provision on-site and to: provide satisfactory storage volume; ensure satisfactory access for collectors and collection vehicles; and be located to avoid nuisance to occupiers and adverse visual impacts. Detailed local design guidance is set out in the Council's Code of Practice for the Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (2016).

6.9.37 The main internal roads within the development site remain unchanged from the RM consent. Accordingly, whilst the applicant has not provided any detail regarding refuse collection points, it is assumed that the servicing arrangements for the site would generally remain as approved. Notwithstanding this, the Council's Waste Officer has requested that the applicant provide a refuse strategy, demonstrating all refuse collection pick-up points across the site. A condition would be attached in this respect. The LPA consider it necessary to also condition a Refuse and Recycling Management Plan.

6.9.38 It is noted that in a meeting held early in 2015, during the early stages of the application, the Council's Waste Officer raised concerns regarding the proposed width of the roads and the ability of the Council's refuse trucks in navigating the development. Specifically, it was indicated that Harrow's refuse vehicles are 3.0m wide (without mirrors) and 11.10m long. The applicant however contests that the Road Vehicles (Construction and Use) Regulations (as amended) dictate a maximum vehicle width of 2.55m, which is the maximum width permitted on UK roads unless it is classed as an abnormal load. The swept path analysis provided therefore demonstrates a standard 3 axles (11.5m long) refuse vehicle of 2.5m width. Notwithstanding this, the Waste Officer has confirmed that the Council's refuse vehicles are able to navigate the first phase of development, currently partly occupied at the site. Given that the roads within the proposed development are generally wider than the constructed roads, Officer's consider that refuse trucks should be able to navigate the proposed development.

- 6.9.39 The proposed development comprises a series of separate bin stores for each of the proposed Blocks. The in stores are close to the main circulation spaces or communal access points to the property, to enable residents to dispose of their waste conveniently. Each store is fully wheelchair accessible, with space for a 1,500mm turning circle within.
- 6.9.40 The Code of Practice states that for flats, communal and high rise development, a two-bin system is recommended. This requires 1 x 1,100 litre waste bin and 1 x 1,280 litre recycling bin to be provided for every 8 flats. The applicant has provided a table regarding the provision of refuse and recycling storage for each building (page 112 of the Design and Access Statement). This table confirms that each block would exceed the requirements for refuse and recycling storage. Whilst it is noted that the plans do not identify which bins would be for recycling and which bins would be for general waste, it is considered that an appropriate ratio of each type of refuse bin can be adequately stored within each designated refuse area.
- 6.9.41 Whilst the proposed refuse and recycling arrangements are accepted, it is considered that a full Site Waste Management Plan, demonstrating compliance proposed refuse collection points, be prepared and submitted to the Local Planning Authority before the commencement of development and that this may be secured as a condition of any planning permission.

External Lighting

- 6.9.41 The applicant has not provided detailed information regarding the proposed lighting strategy across the site. Whilst it is noted that this detailed information was approved as part of the previous consent, this detail would need to be revised in line with the current proposal. Accordingly, a condition of approval is required to secure the submission of a lighting strategy. The required strategy should demonstrate that the proposed lighting would not cause a nuisance to future occupiers or be detrimental to biodiversity.

Conclusion

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

6.10 Ecology, Biodiversity and Trees

- 6.10.1 By inference, the NPPF emphasises that one of the best ways to conserve the natural environment is to encourage the effective use of land by re-using previously-developed land to meet development needs. Paragraph 118 of the NPPF sets out the principles for conserving and enhancing biodiversity, which include resisting development that would: (i) cause significant harm that cannot be avoided, mitigated or compensated-for; or (ii) have an adverse affect on a Site of Special Scientific Interest (SSSI). Opportunities to incorporate biodiversity in and around developments are encouraged.
- 6.10.2 There are no statutory designated wildlife sites within 2km of the site and it is unlikely that the proposal would have negative impacts upon such sites further afield.
- 6.10.3 Headstone Manor Recreation Ground is the nearest SINC to the site, being adjacent to the western boundary. It contains features of ecological interest including: the Copse (ancient woodland); a section of Yeading Brook; The Moat (an area of standing water) and ditches; hedgerows and scurf. Only the Copse is included as a wildlife site in Harrow's DMP.
- 6.10.4 Construction effects of the proposed development on the adjacent SINC would be unlikely to be any different to those which are currently resulting from the extant scheme. Accordingly, the proposal is therefore unlikely to significantly increase background disturbance levels at this site.
- 6.10.5 London Plan Policy 7.19 Biodiversity and Access to Nature echoes the need for development proposals to make a positive contribution to biodiversity, to protect statutory sites, species and habitats, and to help achieve Biodiversity Action Plan targets. This intention is reflected in proposed policy G6 of the Draft London Plan (2017). Local Plan Policy AAP 12 Improving Access to Nature requires all major development proposals to incorporate features that support the protection, enhancement, creation and management of biodiversity within the Heart of Harrow.
- 6.10.6 Chapter 11 of the ES, addresses Ecology and Open Space. The site was inspected in May 2017 to review the current status of habitats. The site was found to be at various stages of construction, with completed dwellings on the northern fringes and active construction work under way in the north-west and eastern areas. The remainder of the site has been stripped and consists of bare ground with a number of soil storage banks.

- 6.10.7 The baseline study has shown that there are no important ecological features remaining in the site at the time of this assessment. Previous assessment (RM consent) identified roosting pipistrelle bats and habitat with potential to support nesting birds as important ecological features. Accordingly, the features of the proposed development which are most relevant to this assessment relate to the previously identified mitigation and enhancements relating to the above ecological features, along with habitat creation. These measures incorporated bat bricks into the fabric of new buildings and the placement of bird boxes.
- 6.10.8 The revised design includes a series of enhancements measures which aim to have the same effect as those previously approved, however taking into account the current state of construction and revised layout.
- 6.10.9 Overall, the proposed development would incorporate the following (as demonstrated on DWG: 1003 Rev B):
- 12 bird boxes;
 - 11 bat bricks;
 - 6 swift boxes;
 - 7 insect hibernacula;
 - 12 reptile / amphibian piles; and,
 - Permeable surfaces will allow natural infiltration into the soil, encouraging invertebrate species.
- 6.10.11 The Council's Biodiversity Officer has indicated that, given the scale of the development and the proximity of suitable foraging within the vicinity (Headstone Manor), the number of bat, bird and invertebrate shelter opportunities should be increased. Details relating to these individual elements should also be provided. Notwithstanding this, it is considered that the proposals are realistic and capable of being implemented on site. On this basis, an appropriately worded condition is recommended to secure details of these enhancement measures prior to the commencement of development.
- 6.10.12 In addition to the measures that have been put forward within in the Ecology and Open Space Chapter of the ES, it is noted that the revised drawings that were submitted during the course of the planning application have proposed a green roof on the six storey element of Block S and the four storey element of Blocks A, J, K, M and R. This is considered to be a positive amendment to the scheme as green roofs can bring benefits to urbanised area other than biodiversity enhancements. These benefits include absorption of rainfall, improvement to the thermal performance of buildings, reduction in the urban heat island effect, improvement in the appearance of a development and assistance to adapt local environments to climate change. Notwithstanding this, it is considered that there is scope to deliver further green roofs within the development. It is considered that additional green roofs and the details of the roofs may be secured as part of appropriately worded landscaping conditions.

6.10.13 Subject to the aforementioned condition, the habitat and feature creation discussed above would be likely to continue to develop and form increased opportunities for colonisation by wildlife species. Accordingly, subject to conditions requiring further detail in this respect, the proposal complies with the intent of policy 7.19 of the London Plans and AAP12 of the AAP.

6.11 Climate Change and Environmental

Air Quality, Ventilation and Odour

6.11.1 London Plan Policy 7.14 Improving Air Quality provides further detail in relation to the air quality impacts of development. Specifically, it requires: minimisation of increased exposure to poor air quality; provision to address local problems of air quality; measures to reduce emissions during demolition and construction; proposals to be 'air quality neutral' and not to lead to further deterioration in air quality; ensure on-site provision of measures to reduce emissions; and assessment of the air quality implications of biomass boilers. The Mayor's SPGs (Sustainable Design and Construction supplementary planning guidance 2014 and The Control of Dust and Emissions during Construction and Demolition supplementary planning guidance 2014) provide further amplification of air quality issues in relation to this and related London Plan policies.

6.11.2 The whole of the Borough has been designated as an Air Quality Management Area (AQMA), due to exceedances of the annual mean objective levels for nitrogen oxide (NO₂) and particulates (PM₁₀).

6.11.3 An Air Quality Neutral Calculation Report has been provided in support of the proposed development (appendix 7.1 of the ES). This assessment quantifies the emissions of atmospheric pollutants at source and compares the emission with official benchmark levels that define neutrality. The air quality assessment report in Chapter 7 of the ES considers the dust effects during construction phase and the air quality impacts during the operational phase of the proposed development.

Emissions during demolition and construction

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

6.11.5 It is therefore considered that the submission of an Air Quality and Dust Management Plan be included as part of a demolition and construction logistics and management plan prior to the commencement of development and that this be secured as a condition of any planning permission.

Increased exposure to emissions during the operation phase

6.11.6 To consider whether the proposal would increase exposure to poor air quality (NO₂ and PM₁₀ concentrations) the assessment modelled the predicted concentrations at 57 locations comprising receptors within the proposed development (i.e. future occupiers) and existing receptors located within the borough's AQFAs (air quality focus areas). The assessment is designed to consider emission from vehicles and building plant.

6.11.7 In terms of transport emissions, the number of vehicle movements generated by the proposed development has been provided by the project's transport consultants. The total development transport emissions (NO_x and PM₁₀) are provided within the Air Quality Neutral Impact Calculation Report.

6.11.8 Appendix 7 of the Mayor's SPG sets out emissions standards for gas CHP plant as well as solid biomass systems. The appendix text states that developments should only include plant that meets the standards and that further details on actual installed plant and emissions performance prior to full operation of the development should be required. The Proposed Development includes the provision of an energy centre comprising a gas engine Combined Heat and Power (CHP) unit and three gas-fired boilers. The development's energy centre has two stacks, the characteristics of which have been informed by the Project's energy consultant, Calford Seaden. The short-term pollutant predictions (NO_x to NO₂) have been considered within the assessment.

6.11.9 The atmospheric dispersion modelling was undertaken for the first year in which the proposed development is expected to be fully operational. The modelling found that pollutant concentrations (NO₂ and PM₁₀) are predicted to be within the relevant health-based air quality objectives at both the existing and proposed receptors. The operational impact of the proposed development was therefore predicted to be 'negligible'.

6.11.10 Based on the above, the applicant's Air Quality assessment concludes that the resulting effect of the proposed development is considered to be 'not significant' overall. This Council's Environmental Health Officer has not raised any objections to this conclusion.

Provision to address local problems of air quality

6.11.11 Although London Plan Policy 7.14 indicates that where provision needs to be made to reduce emissions from a development, it should be made on-site. Accordingly, whilst the assessment concluded that the site and surrounding area would not be exposed to unacceptable NO₂ and PM₁₀ concentrations, it nevertheless remains a consideration that the whole of the Borough has been designated as an AQMA.

- 6.11.12 The applicant has provided a list of recommended site measures for medium dust impacts. It is considered that the recommended measures included within this table would be secured through a Dust Management Plan, approved by the LPA.
- 6.11.13 In terms of the mitigation for the proposed operational phase of the development, a number of traffic relate mitigation measures have been proposed:
- A Travel Plan remedial sum of £16,820
 - A £400,000 contribution towards a new bus service.
 - Car parking provision in accordance with London Plan requirements, including 20% of parking suitable for electric charging;
 - Safe and secure cycle parking in accordance with London Plan requirements; and,
 - A 'pedestrian and cycle contribution' (£25,000) towards the costs of cycle and pedestrian improvement between the land and the town centre.
- 6.11.14 Accordingly, whilst the resulting air quality effect of the proposed development is considered to be 'not significant', the applicant has proposed mitigation measures during the construction and operational phases. In terms of proposed mitigation measures, a Dust Management Plan would be secured by way of condition. Furthermore, the applicant is proposing to prepare a Travel Plan and to designate a Travel Plan Co-ordinator, which will contain measures to reduce the number of vehicle movements and encourage walking, cycling and the use of public transport. A condition would also be attached in this respect.

Noise and Vibrations

- 6.11.15 London Plan Policy 7.15 *Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes*, sets our criteria by which development proposals should manage noise. This is reflected in policies D1 and D13 of the Draft London Plan. These can be summarised as avoiding adverse noise impacts on health and quality of life as a result of new development; mitigating and minimising potential adverse noise impacts upon new development; improving the acoustic environment; separating new noise sensitive development from major noise sources or, where separation is not possible, apply good acoustic design principles; and to promote new technologies/ improved practices to reduce noise at source. This reflects the approach espoused at paragraph 123 of the NPPF and associated guidance. Local Plan Policy DM1 requires a high standard of amenity taking into account, inter alia, noise, hours of operation, and vibration.

Residential Suitability Assessment

- 6.11.16 An assessment of the external noise impacts upon the proposed development has been submitted within Chapter 9 of the Environmental Statement. It is noted that the assessment has been based on noise survey data that was prepared in 2010 in support of the Outline Consent and resubmitted in 2015 in support of the RM Consent (P/2982/15). A standalone Noise Assessment has also been submitted in regards to the proposed energy centre.
- 6.11.17 The submitted report refers to relevant standards against which noise should be assessed. These are the 'British Standard BS8233:2014, Guidance on Sound Insulation and Noise Reduction for Buildings- Code of Practice', and world Health Organisation: Guidelines for Community Noise- 1999'. These documents suggest suitable internal noise levels within living rooms, dining rooms and bedrooms during the daytime and at night. Suitable sound levels are also outlined for outdoor living area.
- 6.11.18 As there have been no major changes to the surrounding built environment, it is considered that the source of the baseline noise and vibrations would not have varied significantly since the 2011 testing. At the time of the 2010 noise survey, the site was affected by a mix of road, rail and industrial noise source. Road traffic movement from Harrow View was considered to be the principle source of noise experienced at the site.
- 6.11.19 Notwithstanding this, in July 2015 additional baseline sound monitoring was undertaken at one location on the site, approximately 7.0m from the kerb of Harrow View. The results of this testing are included within chapter 9 of the Environmental Statement. The comparison noise levels recorded in 2015 indicates that the measured sound levels from the 2010 survey were either consistent with the new measurements of marginally higher than the sounds levels from the 2015 survey. In this context, the approach of using the 2010 survey data to inform the residential suitability assessment is accepted.
- 6.11.20 The ambient / background sound levels are typical of an urban areas where the site is dominated by road traffic noise. Given that the primary source of baseline sound levels to the site is generated from road traffic noise from Harrow View, the assessment considers that the dwellings fronting Harrow View would be exposed to highest level of noise.
- 6.11.21 Within the assessment of residential suitability, it is indicated that the facades of the residential properties can be designed to ensure that appropriate internal noise levels are achieved. Whilst the applicant has indicated that a detailed assessment of all proposed facades would be carried out at the detailed design stage, an assessment of internal sound levels has been carried out using the façade attenuation value and standard double glazing from British Standard BS8233:2014. The results of the assessment (provided within Table 9.13 of Chapter 9 ES) indicate that internal noise levels within the proposed dwellings adjacent to Harrow View would meet BS 8233 when windows are closed. However, with partially open windows, the criteria would not be met (habitable rooms only).

- 6.11.22 In this context, the facades of properties fronting Harrow View and their associated amenity space would require noise insulation treatments to ensure that suitable noise levels are achieved. An alternative means of ventilation, either passive or mechanical, would also be required which would not compromise the acoustic performance of the building envelope. A condition requiring a more detailed assessment of the specific flats/rooms requiring mitigation, together with a detailed specification of the level of mitigation required and the methods proposed in each case is therefore necessary to achieve a high standard of residential amenity in this regard. In order to achieve the required standards, an analysis of the external building fabric and glazing is required to ascertain the acoustic performance of the external fabric elements. In addition to this, the noise levels to any external amenity areas fronting Harrow View should also be reviewed, with appropriate acoustic treatments specified where necessary.
- 6.11.23 As detailed within chapter 9 of the ES, it is considered that the 4 and 6 storey buildings along Harrow View would provide considerable acoustic shielding for the rest of the development, including the vast areas of public realm. Accordingly, given the assessment has demonstrated that acceptable noise levels can be achieved in the development areas most exposed to noise, this also demonstrated that acceptable noise levels can be achieved throughout the remainder of the site.
- 6.11.24 The application has been referred to the Council's Environmental Health team who note the contents of the submitted noise report are as previously submitted in 2010. On the basis of the information that has been submitted, the Environmental Health team have suggested a planning condition to address noise impacts, primarily to the properties fronting Harrow View.

Mechanical Plan

- 6.11.25 The applicant has provided an assessment of the proposed energy centre (CHP) in accordance with the British Standards.
- 6.11.26 This initial estimate of impact within this assessment concludes that adverse impact could occur during the night time period (23:00- 07:00 hours); however this is dependant on the contextual considerations. Specifically, the consultants indicate that the information provided by the project team indicates that the plant from the energy centre would generate a higher level of noise than plant from similar developments. Notwithstanding this, modelling undertaken with the use of an acoustic louvre (IAC SL-600) indicates that the sound levels during the daytime and night-time would not be noticeable.

- 6.11.27 The report concludes that further consideration of the noise transfer from the energy centre to the residential units immediately adjacent and immediately above, would need to be considered at the detailed design stage. The plant would need to be operated in such a manner as to avoid unacceptable adverse impacts, in accordance with the British Standards (BS 4142:2014). It is recommended that quieter items of plant would need to be considered at the detailed design stage. In addition, plant would need to be maintained and operated in an appropriate manner, to ensure that extraneous noise from mechanical vibration, creaking and squeaking is kept to a minimum.
- 6.11.28 Accordingly, a pre-commencement condition is required to ensure that appropriate measures are in place to ensure that noise associated with the mechanical plant would result in impacts of negligible or low magnitude.

Effect of the Proposed Development on the Environment

- 6.11.29 Chapter 9 of the ES provides an assessment of the potentially significant noise and vibration effects associated with the construction and operation of the proposed development.
- 6.11.30 The assessment of noise and vibration impacts from construction activity indicates that negligible effects are likely to occur. In terms of vibrations, the ES suggests that bored or Continuous-Flight Auger (CFA) piling would be likely to be used as these methods do not generate significant vibration emissions and are not significantly noisier than other mechanised construction plant. Whilst construction noise may, at times, be noticeable in external areas, the surroundings areas would not be subject to extended durations of the highest level of construction noise. Notwithstanding this, a condition of approval will require the submission of a construction management plan, for approval by the LPA, prior to any works commencing on site.
- 6.11.31 The applicant has also made an assessment of the traffic noise generated by the proposed development within the operation phase. This assessment has utilised data from the Transport Assessment to predict the noise impacts of the predicted change in flow during the day and night. This assessment concludes that negligible effects are likely to occur at nearby sensitive receptors.
- 6.11.32 Accordingly, subject to a condition requiring the submission of a construction management plan and further conditions relating to the operation of the CHP, on the basis of the assessment carried out, no significant noise or vibration effects are considered likely to arise from the proposed development during either the construction or operational phases.

Contaminated Land

- 6.11.33 The NPPF (paragraph 121) requires LPAs to ensure that the site is suitable for the new uses proposed, taking account of ground conditions including pollution arising from previous uses. Adequate site investigation information, prepared by a competent person, should be presented.

- 6.11.34 A contamination assessment and remediation strategy have previously been undertaken in connection with the site to meet the requirements of Condition 33 of the RM Consent. The reports submitted in connection with this Condition comprised:
- ‘Phase 1 Environmental Desk Study – Harrow View West, London’, BRD Environmental Ltd, report ref. BRD2370-OR1-A, dated July 2015; and,
 - ‘Phase 2 Geo-Environmental Site Investigation and Remediation Strategy - Harrow View West, London’, BRD Environmental Report Ref. BRD2370-OR2-A, August 2015. These report were submitted to the planning department and the related parts of Condition 33 were discharged.
- 6.11.35 These assessments concluded that due to the required level of earthworks ‘cut’ as part of the new development, the proposed remediation strategy was one of total contaminated soil removal. The applicant’s consultants, BRD, have confirmed that they were present on site throughout the remedial earthworks to verify that the contaminated soils were removed in their entirety.
- 6.11.36 Due to the size of the development, the site was zoned in to four areas (Areas 1-4). The verification of Areas 1-3 has been completed and documented.
- 6.11.37 Area 4 is currently occupied by the construction compound and therefore has not yet been remediated. It is however considered that this area of the site would also require the removal of contaminated soil.
- 6.11.38 Whilst the contamination of the land has not been addressed within the ES, stand-alone documents have been submitted in support of the application and provided to the Council’s Environmental Health team. These documents indicate that as the remediation is not dependant on the layout, the revised layout would have no bearing on the successful verification of the site that has already been undertaken and as such, the previously submitted verification reports (for Area 1 and Areas 2 & 3) are applicable to the new scheme. Whilst this is accepted, the formal discharge of the planning condition has not been possible as area 4 of the site has not yet been remediated and verified.
- 6.11.39 No representations have been received from the EA or the Council’s Environmental Health department at the time of writing this report regarding the previous contamination identified at the site, or the investigations undertaken in support of the subject planning application.
- 6.11.40 Whilst the above is noted, it is considered necessary to reattach the planning conditions for the land within the redline boundary to ensure appropriate intrusive site investigation is carried out for the whole site, prior to the construction of the proposed buildings. Specifically, as the applicant has not yet provided details for area 4, the planning conditions would require verification reports for the whole site (areas 1-4) in order for the condition to be approved. The applicant’s construction phase plan indicates that area 4 (in terms of remediation) would be the next phase of development and as such, the submission of verification for the complete site should be achievable.

6.11.41 Subject to compliance with these conditions, it is considered that the site can be made safe for future end users (residents, employees and the general public) and the proposal is therefore considered to be acceptable in this regard.

Flood Risk and Sustainable Drainage

6.11.42 With reference to the Environment Agency's Flood Map for Planning, the site falls within Flood Zone 1, meaning that the site is assessed as having a less than 1 in 1,000 annual probability of fluvial flooding from main rivers. The site is also considered to have a low potential for surface water flooding, groundwater flooding and overwhelmed sewers. The nearest watercourse to the site is Yeading Brook, which runs from northeast to southwest through the borough. Whilst the site lies within an area with a low to very low chance of surface water flooding, the Local Plan designates the site as a critical drainage area meaning that it is susceptible to flooding from surface water.

6.11.43 In relation to Flood Risk Vulnerability and Flood Zone 'Compatibility', the planning practice guidance to the NPPF advises that all uses of land are appropriate in Flood Zone 1. On this basis, the Sequential Test is satisfied.

6.11.44 The NPPF states that a site-specific flood risk assessment (FRA) is required for proposals of 1 hectare or greater in Flood Zone 1. The application site area is approximately 3 hectares and as such, an FRA has been submitted with the application.

6.11.45 Prior to the submission of this application, a detailed surface water drainage strategy was approved under condition 14 of the RM Consent. Within this application, the applicant submitted a detailed Flood Risk Assessment (FRA) and a detailed drainage layout, which included the provision of swales and ponds. The development was proposed to partly drain the surface water from the site towards Headstone Manor and connect into the proposed reed bed project that the Council are undertaking on the Headstone Manor Recreation grounds. The remaining part of the development would drain towards Harrow View. The attenuation discharge rate was 5 litres per second per hectare, in line with Council's Drainage requirements. The Council's Highway Engineer was satisfied with the information submitted.

6.11.46 The applicant has provided an updated FRA, in support of the proposed intensified development. The findings of this assessment are discussed below.

Reduce surface water run-off

6.11.47 London Plan Policy 5.13 Sustainable Drainage states that development should aim to achieve greenfield run-off rates and this objective is reiterated in Local Plan Policy AAP 9. This is also reflected in policy SI13 of the Draft London Plan (2017).

6.11.48 The proposed drainage strategy seeks to follow the surface water management principles that were approved under the RM Consent. Specifically, the principles of the drainage strategy include four drainage catchments, attenuation locations, four outfall locations and agreed discharge rates.

6.11.49 The proposed development results in the intensification of development and a greater extent of impermeable area compared to the consented scheme. The proposed sewer network and attenuation provision has been revised to accommodate the additional impermeable area without increasing flow rates at the outfall location. Outflow from the storage facilities is controlled by means of suitable flow control devices and discharged to either a Thames Water surface water sewer or the proposed Headstone Manor Reed Bed system. All four drainage catchments would discharge at 5 l/s (total discharge from all four drainage catchments should never exceed 20 l/s). The applicant has indicated that the proposed development would therefore reduce flood risk overall when compared to existing greenfield rates. The Council's Drainage Team has advised that 5 litres per second is acceptable as the appropriate greenfield run-off rate for the site. It is considered that the proposed run-off rate may be secured as a condition of any planning permission.

Utilise sustainable drainage systems

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

6.11.51 London Plan Policy 5.13 sets out a hierarchy of sustainable drainage measures (also contained in draft policy SI13), with the aim of managing surface water run-off as close to source as possible. Policy 5.11 Green Roofs and Development Site Environs calls for major developments to incorporate green roofs where feasible and Policy 5.15 Water Use and Supplies identifies rainwater harvesting as one of the methods that can help to conserve potable water.

6.11.52 The extent of the impermeable area draining to the proposed drainage system has increased by 0.585 ha, when compared to the RM Consent. In this respect, the previously proposed sewer network and SuDs features have been revised as appropriate. The system includes, swales and detention basins in the public open space and pipes in tanks.

6.11.53 Whilst it is noted that the applicant's FRA does not make reference to green roofs or water use techniques such as rainwater harvesting, the Council's drainage team has expressed satisfaction with the proposed drainage strategy. Notwithstanding this, the drainage officer has advised that it is necessary to secure detailed drainage proposals, such as full details of SuDs and permeable paving as a condition of any planning permission.

Ensure adequate management and maintenance arrangements

- 6.11.54 Details of the proposed arrangements for the future management and maintenance of the drainage systems have been submitted with the application. A maintenance strategy has been outlined on page 28 of the FRA. As noted above, the Council's drainage team has expressed satisfaction with the applicant's sustainable drainage strategy has advised that it is necessary to secure a management and maintenance plan as a condition of any planning permission.

Prevent water pollution

- 6.11.55 The applicant's Flood Risk Assessment states that, where appropriate, pollution control measures such as trapped gullies to retain sediment and suitably designed ponds or grassed basins / swales to contribute to the pollutant and sediment removal will be incorporated within the drainage system. All road areas and other areas would drain via pervious paving or pass through a separator, which would meet the requirements of BS EN 858, before discharging into the downstream drainage system. Again, it is noted that the Council's drainage team has expressed satisfaction with the applicant's strategy and has advised that such details as may be necessary to prevent the spread of any pollutants from the on-site drainage system may be secured as a condition of any planning permission.
- 6.11.56 The application has also been referred to the Environment Agency who have not raised an objection to the application. No comment has been received from Thames Water.

Carbon Dioxide Emissions Reductions

- 6.11.57 On October 1st 2016 (during the course of the planning application), a zero carbon policy requirement came into force on all residential development (policy 5.2 of the London Plan), whereby at least a 35% reduction in carbon emissions (relative Part L Building Regulations 2013) is required to be achieved on site (the London Plan still refers to the 2010 Building Regulations, with an equivalent target of 40% reductions in carbon emissions). The balance emissions to achieve zero carbon are required to be offset through a monetary contribution to be used on carbon reduction measures within the borough.
- 6.11.58 The GLA have confirmed that this requirement applies to all Stage 1 referrals received by the Mayor on or after 1st October 2016. The Mayor considered the stage 1 referral on this particular planning application in September 2016 and as such, is satisfied for this proposal to meet the 35% improvement upon the requirements of the 2013 Building Regulations.
- 6.11.59 The Energy Strategy details a range of methods, relative to the London Plan energy hierarchy, that would achieve a combined improvement of 35.5% upon the requirements of the 2013 Building Regulations as set out below.

Use less energy (lean measures)

The Energy Strategy attributes CO2 savings of 6.4% from measures that would reduce energy demand on the site. The CO2 reduction would be achieved from: measures incorporated into the building fabric such as types of floors, walls, party walls, roofs, windows and doors that are used in each of the blocks; the use of energy efficient mechanical ventilation; the use of low energy lighting and ensuring attention to details during construction to achieve low air permeability and to prevent thermal bridging.

Supply energy more efficiently (clean measures)

The Energy Strategy attributes CO2 savings of 30.9% from the installation of a gas powered Combined Heat and Power (CHP) network, which the Energy Statement Addendum states is capable of being connected to any future district wide CHP. The CHP network would be 300kWe and would provide a heat and power source to all of the buildings.

Use renewable energy (green measures)

As the 35% requirement is achieved through energy efficiency and low carbon measures alone, no renewable energy provision is required in relation to the intensified scheme but there is scope for installation of renewable energy technology should detailed modelling during design and construction of the scheme demonstrate a shortfall in predicted carbon reductions.

- 6.11.60 The strategy includes an assessment of a range of potential renewable energy technologies and concludes that solar PV is the most appropriate technology for the site.
- 6.11.61 The energy strategy identifies that there is a shortfall in the required carbon reductions for the existing dwellings of 5% (against the 35% reduction target). The strategy proposes 186 sqm of solar PV panels on the proposed dwellings to address this shortfall. These are proposed on Blocks B, C, D, E, H, L and N and will be at a 10 degree angle to reduce visual impact. This approach is considered acceptable, in accordance London Plan Policy 5.7 Renewable Energy.
- 6.11.62 Compliance with the energy strategy and carbon emissions reductions measures contained within should be secured by way of condition on any planning permission (approved documents), with final Part L Building Regulations calculations submitted once the development is complete.

Decentralised Energy

- 6.11.63 London Plan Policy 5.6 Decentralised Energy in Development Proposals applies a hierarchy to the selection of appropriate energy systems for major development proposals and calls for opportunities to extend decentralised energy systems beyond the site boundary to adjacent sites to be examined. It also states that, where future network opportunities are identified, proposals should be designed to connect to these networks.

- 6.11.64 Harrow's Core Strategy includes a commitment to explore the feasibility of a district-wide decentralised energy network for the Harrow & Wealdstone opportunity area, and Policy CS2 K requires new development to make provision for future connection to the network. Local Plan Policy AAP 10 Harrow & Wealdstone District Energy Network reiterates the priority to be given to connecting to (or making provision for future connection to) any district-wide network, and encourages applicants to discuss the potential for the capacity of the on-site energy centre to be increased to serve both the site and adjacent sites/uses. The policy also establishes a hierarchy for system selection.
- 6.11.65 The Council is currently progressing detailed feasibility and outline business case investigations for a district heat network serving major development sites in Wealdstone. At this point in time it is not envisaged that the network will serve the Harrow View East (Kodak) site nor the subject site (Harrow View West / former Zoom Leisure). However, in accordance with the London Plan (Policy 5.6 Decentralised Energy in Development Proposals) and the Harrow and Wealdstone Area Action Plan (Policy AAP10: Harrow & Wealdstone District Energy Network), provision should be made for future connection to district heat network serving the site, should one become available. This future provision should include safeguarding of a route to physically connect to the site and requiring actual connection to the network on commercially reasonable terms; these requirements should be secured by way of condition on any approval and through s106 planning obligations.
- 6.11.66 The proposed site-wide decentralised energy network would take the form of a combined heat and power system. The applicant's Energy Strategy considers and discounts the use wind turbines, heat pumps and solar thermal. A 300 kWe gas powered Combined Heat and Power (CHP) network is therefore proposed. The necessary plant would be accommodated within an energy centre located at the northern end of Block S.
- 6.11.67 Section 5.2 of the applicant's Energy Statement indicates that the district heating network would be provided with anchor loads in order to allow future connections with future expansion of onsite district heating and area wide heat distribution network.
- 6.11.68 Accordingly, it is considered that a Planning Obligation should also be sought requiring that an agreed route for infrastructure be safeguarded, to ensure that it would be technically feasible to extend the proposed combined heat and power network to enable a connection to any future district-wide decentralised energy network. Furthermore, the obligation would include a commitment by the developer to make reasonable endeavours to co-operate with the Council (or its agent) to agree terms pursuant to a connection between the site-wide CHP system and a future district-wide decentralised energy network.

Renewable Energy

- 6.11.69 London Plan Policy 5.7 Renewable Energy requires major development proposals to achieve reductions in CO2 emissions through the use of on-site renewables, where feasible. Local Plan Policy DM14 Renewable Energy Technology echoes this requirement. As noted above, part of the development's compliance with the London Plan's CO2 reduction target is predicated on the provision of PV panels.

Sustainable Design and Construction

- 6.11.70 The NPPF requires new development to comply with adopted local policies on decentralised energy supply and to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption. London Plan Policy 5.3 Sustainable Design and Construction requires development proposals to meet the minimum standards outlined in the Mayor's SPG and sets out the principles for sustainable design and construction. Local Plan Policy DM12 Sustainable Design and Layout sets out Harrow's local requirements and these are incorporated into the appraisal below.
- 6.11.71 London Plan Policy 5.9 Overheating and Cooling provides further detail on this point, requiring development proposals to follow a cooling hierarchy (to avoid overheating and reliance on air conditioning systems) and requiring major development to demonstrate how the proposal would minimise overheating and meet its cooling needs. The importance of passive measures and insulating building materials are emphasised in Local Plan Policy DM12 and the Mayor's SPG.
- 6.11.72 The applicant has submitted a Thermal Comfort Assessment in compliance with the above policies. It is noted that this assessment has not been revised to reflect the final proposal. Whilst this report is considered to assess a worse case scenario than the final proposal, a condition of approval has been attached requiring a full assessment of the proposed buildings.
- 6.11.73 Consideration of the proposal's measures for ensuring the efficient use of water and for the handling of construction, excavation and demolition waste is set out elsewhere in this report. Notwithstanding, a condition should be imposed requiring the submission of a water strategy demonstrating that the mains water consumption of the proposed development will not exceed 105 litres per person per day (excluding an allowance of 5 litres or less per person per day for external water consumption).
- 6.11.74 London Plan Policies 5.10 Urban Greening and 5.11 Green Roofs and Development Site Environs call for the provision of green infrastructure on site, including planting, green roofs and green walls. As set out elsewhere in this report, the proposal does make provision for green roof. The details of these green roofs can be secured as part of the hard and soft landscaping details required as a condition of any planning permission.

6.11.75 As set out elsewhere in this report, it is considered that the proposed uses would not pose a significant threat of future land contamination, flood risk and seeks to avoid impacts from natural hazards. Furthermore, air quality and noise issues are dealt with in separate sections of this report and, subject to necessary mitigations that can be secured as conditions of any planning permission, are considered to be acceptable.

6.12 Infrastructure

Electricity and Gas

6.12.1 London Plan Policy 5.4A Electricity and Gas Supply calls for developers to engage with Boroughs and energy companies to identify the gas and electricity requirements of their proposals. Core Strategy Policy CS1 Z requires proposals to demonstrate that adequate existing or proposed infrastructure capacity exists or can be secured both on and off the site to serve the development.

6.12.2 The site would be served by a gas powered Combined Heat and Power (CHP) network. The CHP network would provide a heat and power source to all of the buildings

6.12.3 The adequacy of the electricity and gas supply to meet existing needs and planned growth was considered, in strategic terms, as part of Harrow's Infrastructure Assessment and Delivery Plan (2011). The Plan notes that, other than a need to upgrade two electricity substations (both of which would be delivered by the relevant supplier), no further gas or electricity infrastructure requirements have been identified for the Borough. As such, it is considered that the proposed development would be adequately served by existing gas and electricity infrastructure and that it would not detrimentally affect gas and electricity distribution elsewhere in the borough.

Water Use and Waste Water Capacity

6.12.4 London Plan Policy 5.15 Water Use and Supplies requires development to minimise the use of mains water by incorporating water saving measures and designing residential development so that mains water consumption would meet a target of 110 litres or less per head per day (including an allowance of 5 litres or less per head for external water consumption. A condition has been attached in this respect.

6.12.5 London Plan Policy 5.14 Water Quality and Waste Water Infrastructure requires development to ensure adequate waste water infrastructure capacity. Core Strategy Policy CS1 Z echoes the need for proposals to demonstrate adequate existing or proposed infrastructure capacity. Local Plan Policy AAP 9 Flood Risk and Sustainable Drainage requires proposals to demonstrate that they would be resistant and resilient to flooding from all sources (including sewer flooding).

- 6.12.6 It is noted that the applicant will require Thames Water approval to connect to the existing water and wastewater infrastructure.

Waste and Recycling

- 6.12.7 London Plan Policy 5.3 Sustainable Design and Construction requires development to minimise the generation of waste and maximise reuse or recycling. These sentiments are echoed in Core Strategy Policy CS1 X. Local Plan Policy DM45 Waste Management requires proposals to make waste management provision on-site and to: provide satisfactory storage volume; ensure satisfactory access for collectors and collection vehicles; and be located to avoid nuisance to occupiers and adverse visual impacts. Detailed local design guidance is set out in the Council's Code of Practice for the Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (2016).
- 6.12.8 The Code of Practice states that for flats, communal and high rise development, a two-bin system is recommended. This requires 1 x 1,100 litre waste bin and 1 x 1,280 litre recycling bin to be provided for every 8 flats. Refuse storage would be provided internally within each building. The applicant has provided a table regarding the provision of refuse and recycling storage for each building (page 112 of the Design and Access Statement). This table confirms that each block would exceed the requirements for refuse and recycling storage. The applicant have advised that they will be adopting a private management plan whereby an on-site manager will manage refuse storage and collection as necessary.
- 6.12.12 It is considered that a full Site Waste Management Plan demonstrating compliance with these policies should be prepared and submitted to the Local Planning Authority before the commencement of development and that this may be secured as a condition of any planning permission.

Other Infrastructure

- 6.12.13 On 1st April 2012 the Mayor of London's Community Infrastructure Levy (CIL) came into force and applies to all development except medical and educational uses. In Harrow, the Mayor's CIL is charged at a rate of £35.00 per square metre. It used to help fund the Crossrail infrastructure project.
- 6.12.14 It is calculated that the proposal would generate a liability of £1,347,815 under the Mayor's CIL. This figure is net of anticipated social housing relief.
- 6.12.15 On 1st October 2013 Harrow Council's CIL came into force. It applies to new residential development at a rate of £110.00 per square metre. It is calculated that the proposal would generate a liability of £4,235,990 under the Harrow CIL. This figure is net of anticipated social housing relief.

6.12.16 London Plan Policy 8.2 Planning Obligations states that planning obligations should address strategic as well as local priorities and that affordable housing and public transport improvements should be given the highest importance. Core Strategy Policy CS1 AA requires all development to contribute to the delivery of strategic infrastructure identified in Harrow's Infrastructure Delivery Plan. Local Plan Policy DM 50 Planning Obligations undertakes to seek s.106 planning obligations to secure the provision of affordable housing and other infrastructure needed to mitigate site specific impacts of the proposed development.

6.12.17 Pursuant to the aforementioned policy framework the Council has published a Planning Obligations supplementary planning document (SPD). The following assessment of the proposed development's infrastructure requirements has regard to the relevant content of this SPD.

Affordable Housing & Wheelchair Homes

6.12.18 London Plan Policy 3.12 Negotiating Affordable Housing on Individual Private Residential and Mixed-Use Schemes calls for the maximum reasonable amount of affordable housing to be provided in individual proposals and sets a clear expectation in favour of on-site provision. Core Strategy Policy CS1 J reiterates the requirement for the maximum reasonable amount of affordable housing to be provided on site.

6.12.19 Side wide, the proposal makes provision for 66 affordable rent and 42 shared ownership homes. The resulting total of 108 affordable homes represents a proportion of 19% of the total of 569 homes within the wider Harrow View West site.

6.12.20 In accordance with the SPD, it is proposed that a planning obligation be used to secure the 108 affordable homes and that a late stage review mechanism be applied to take account of any changes in viability during the course of development. In the event that viability review demonstrates that the development is financially capable of supporting an increased affordable housing offer, the expectation (in accordance with policies) is that these be provided on-site.

Transport and Highways

6.12.21 The SPD makes it clear that whilst general improvements to transport infrastructure are to be funded by the CIL and other sources, additional works required to accommodate or mitigate the impact of a proposed development should be funded by the developer.

6.12.22 Transport mitigation measures and off-site highway works will be required to mitigate the impacts of the proposed development. In particular:

- The provision of an additional bus service along Harrow View. A £400,000 contribution is required to TFL in this respect; and
- A £25,000 contribution towards improving pedestrian and cycle routes in the surrounding area.

6.12.23 London Plan Policy 6.3 Assessing Effects of Development on Transport Capacity requires workplace and/or residential travel plans to be submitted with relevant types of application. The subject application has been accompanied by a travel plan. The plan contains a number of targets and measures, including the appointment of a travel plan co-ordinator for the site. The Council's Travel Planner has confirmed that the final version of the Travel Plan is acceptable. In accordance with the SPD, a £38,180 obligation is required to ensure that the developer uses all reasonable endeavours to secure the effective implementation, monitoring and management of the revised travel plan for the site is considered necessary. It is noted that this contribution is in addition to the £16,820 travel plan remedial sum previously secured (£55,000 in total).

6.12.24 The s106 would require two car club spaces to be delivered on site. An obligation requiring the developer to make provision for these spaces and to make reasonable endeavours to secure a car-club operator to provide a vehicle for that space is therefore sought.

Public Realm Maintenance and Management

6.12.25 Policy AAP3 requires new development within Wealdstone (all 3 areas) to contribute to a programme of urban realm enhancements based around Harrow and Wealdstone Station and the promotion of better east-west pedestrian and cycle links.

6.12.26 It is considered that the green link and area of open space would improve pedestrian and cycle crossing in this area. A contribution was previously sought within the RM consent in regards to Legible London wayfinding signs around the site.

6.12.27 Given the importance of this area as a community facility, a planning obligation is necessary to secure public access to this area. A further obligation would require the submission of a Maintenance and Management Plan to the Council for approval.

Employment and Training

6.12.28 The SPD states that all major developments will need to contribute to local employment and training. The SPD identifies three types of employment and training obligation: construction training; general employment and training; and use of local suppliers.

6.12.29 In accordance with the extant consents, the applicant was required to pay financial contributions of £50,460.00 towards economic development and £95,874.00 towards employment training.

6.12.30 In accordance with the SPD, the Council's Economic Development team have requested that the following economic development and employment training contributions are secured (in addition to the previous contributions) to reflect the increased density at the site:

- Economic Development: £40,980; and,
- Employment Training: £77,860.

Decentralised Energy Networks

- 6.12.31 The planning application proposes the installation of a site-wide CHP system. The implementation of the proposed site-wide CHP system can be secured through planning conditions.
- 6.12.32 London Plan Policy 5.6 Decentralised Energy in Development Proposals states that, where a new CHP system is found to be appropriate for a development, opportunities to extend the system beyond the site boundary should also be examined. The Council is committed to the delivery of a district-wide decentralised energy network within the Heart of Harrow. Local Plan Policy AAP 10 Harrow & Wealdstone District Energy Network requires major development proposals within the Heart of Harrow to ensure that the design of the development would facilitate future connection to such a district-wide network and (for proposals comprising over 100 dwellings) applicants are encouraged to discuss with the Council the potential to increase the capacity of the on-site energy centre to additionally serve adjacent sites and uses. The SPD calls for the developer to carry out any on and/or off site works and, where connection to a network is required, a contribution towards the cost incurred by the Council (or its agent) of any off site works.
- 6.12.33 It is considered that a Planning Obligation should be sought requiring the proposed on-site energy centre to be laid out with sufficient space, and that an agreed route for infrastructure be safeguarded, to ensure that it would be technically feasible to extend the proposed combined heat and power network to serve the remainder of the allocated site and that the opportunity to connect to a wider area network is not permanently lost.
- 6.12.33 Energy Masterplanning work undertaken by the Council (and required by the London Plan Policy 5.5) indicates that a district heating network within Wealdstone is technically and financially feasible. Further detailed feasibility work is scheduled to commence. It is considered that a Planning Obligation should be sought requiring that any such potential route is safeguarded and requiring the developer not to unreasonably refuse such passage or impose unreasonable costs on such passage.

Education and Health

- 6.12.34 It is noted that a number of representations have been received in relation to the impacts of the development on health and education. However, individual contributions cannot be sought in relation to this, as improvements will already have been secured through the Harrow CIL. This development would generate a contribution of £4,235,990 which will be used to fund infrastructure in Harrow.

7.0 CONCLUSION AND REASONS FOR APPROVAL

- 7.1 In response to the re-designation of the Heart of Harrow (Harrow and Wealdstone Intensification Area) as an Opportunity Area (London Plan 2015) and as one of the Mayor's Housing Zones, the applicant is seeking full planning permission for the intensified residential development over part of the site (included within the redline site boundary). The wider Harrow View West site would provide 569 dwellings, representing an uplift of 255 from the reserved matters consent.
- 7.2 The concerns of residents, amenity associations and neighbouring interests regarding the proposed development are all acknowledged. The Council also sympathises with the surrounding residents in regards to the extended time frame of the application process. Whilst the following appraisal identifies impacts of the proposed development on the surrounding area and local infrastructure, it is considered that such impacts are inevitable if necessary growth is to be delivered within one of London's opportunity areas. Furthermore, whilst the assessment identifies areas requiring further consideration or additional detailed information, it is considered that on balance, the following reasons for approval justify the grant of planning permission:
- 7.2.1 The wider Harrow View Site would add to the supply of contemporary dwelling houses and purpose-built flats across the market sale, shared ownership and affordable rented tenures. In response to demographic and market trends and the needs of different groups, the proposed dwellings would range in size from one bedroom studio flats to larger family sized dwellings. All of the proposed units would provide an acceptable standard of accommodation and 10% of all units would be wheelchair adaptable. Overall, it is considered that the current proposal would make a valuable contribution towards the delivery of target housing outputs including affordable housing units for the Heart of Harrow Opportunity Area, a designated Housing Zone. The proposed residential offer would promote housing choice and make a positive contribution to the creation of inclusive and mixed communities in West Harrow.
- 7.2.2 The proposed high quality public realm would provide a unique setting for the future residential development and would create opportunities for social interaction that would enhance the sense of community within the wider area. Whilst there is currently no through access from Harrow View to Headstone Manor, the proposed green link would provide a new pedestrian and cycle connection from the Harrow View through to Headstone Manor grounds. In addition to the green link, the proposed development would provide new spaces and places for the public, in the form of a large area of open space and pocket parks; with formal and informal play equipment. A multi-use game area is also proposed on the edge of the green. All areas of public realm and the access to headstone Manor would remain open to use by the public. Accordingly, the proposed development would provide enhanced benefits to the local community through improved connectivity and the provision of open space.

- 7.2.3 The proposal would deliver a scheme that would greatly assist towards the regeneration of Wealdstone district Centre, which is known to be currently under-performing. It is considered that the proposal will provide a much needed physical renewal of the site which would strengthen connectivity within Wealdstone and would positively relate to the adjoining Headstone Manor Ground. It is anticipated that the mere fact of redevelopment would improve perceptions of the district centre and confidence in the strength of the local economy. It is envisaged that the proposal will therefore assist to improve economic performance and quality of life in this locality, helping Wealdstone to achieve its full potential.
- 7.3 A comprehensive assessment of the potential impacts on surrounding amenity has been undertaken. The findings of this assessment acknowledged that the proposal would bring about a significant change in outlook for neighbouring occupiers. However, in the context of the previous approval, the site allocation and the designation of the site, the resulting outlook is not considered to be unreasonable. It is considered on balance that subject to a comprehensive schedule of planning obligations and planning conditions relating to design and materiality, that the proposal would not detrimentally impact upon the amenity of neighbouring occupiers.
- 7.4 Subject to the planning conditions and s106 obligations, in particularly the contribution towards a new bus service, it is considered that the transport impacts of the proposal are acceptable and in this regard, the proposal would comply with the aims and objectives of the Development Plan.
- 7.5 The environmental information and a range of potential environmental impacts have been assessed in accordance with regulation 3 of the EIA Regulations. The application shows that the proposal would incorporate measures that would help to adapt to/manage the impacts of climate change and identify areas where mitigations are required, including those needed to secure adequate living conditions for future occupiers and to safeguard the environment of surrounding occupiers during demolition and construction phases. These mitigations would be secured through a range of recommended conditions of planning permission. Infrastructure made necessary by the development is incorporated within the proposed Heads of Terms of a Planning Obligation to be entered into under section 106 of the Town and Country Planning Act. Contributions to general infrastructure requirements would be made under Harrow's Community Infrastructure Levy.
- 7.67 For these reasons and weighing up the development plan policies and proposals for material consideration, it is recommended that planning permission is granted, subject to completion of a planning obligation under section 106 of the Town and Country Planning Act 1990 (as amended) and the following conditions applied:

APPENDIX 1: Conditions and Informatives

Conditions

1 Timing

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

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

2 Approved Plans and documents

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

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

3 Construction Management and Logistics Plan

No development shall take place until a construction logistics plan has first been submitted to, and agreed in writing by, the local planning authority. The plan shall detail the arrangements for:

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

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

REASON: To ensure that measures are put in place to manage and reduce noise and vibration impacts during demolition and construction and to safeguard the amenity of neighbouring occupiers and to ensure that the transport network impact of demolition and construction work associated with the development is managed and that measures are agreed and in place to manage and reduce dust, noise and vibration during the demolition and construction phases of the development and manage transport impacts during the demolition and construction phases of the development, this condition is a PRE-COMMENCEMENT condition.

4 Strategy for window / door openings

Notwithstanding the details shown on the approved plans, the construction of the buildings hereby approved shall not progress beyond damp proof course level until a revised cohesive strategy for building entrances, external bin store doors, security gates, external bicycle stores and external sub-station doors, has first been submitted to the Local Planning Authority to be agreed in writing. The strategy shall include detailed drawings demonstrating projecting brick surrounds, canopies, recessed elements and material specifications. The strategy should provide a clear hierarchy of entrances, ensuring that the private entrances are clearly distinguishable from communal entrances. Consistency should be provided across the development site. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development achieves a high standard of design and provides a high quality, safe and attractive public realm. To ensure that high quality architectural design principles are agreed across the development site, this condition is a PRE-COMMENCEMENT condition.

5 Window and door reveals

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

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

To ensure that high quality architectural design principles are agreed across the development site, this condition is a PRE-COMMENCEMENT condition.

6 Surface Water Drainage

No development shall take place, other than works of demolition, until a drainage management and sustainable drainage system maintenance plan has first been submitted to the Local Planning Authority to be agreed in writing. The scheme shall be generally consistent with Surface Water Drainage Strategy-June 2015, as approved by P/2982/15, except where required to take account of the amended dwelling locations. The development shall be carried out and thereafter be managed and maintained in accordance with the plan so agreed.

REASON: To ensure that the development achieves an appropriate surface water run-off rate in this critical drainage area and to ensure that opportunities drainage measures that contribute to biodiversity and the efficient use of mains

water are exploited. To ensure that such measures that are required to secure the future management and maintenance of the surface water drainage systems are agreed and built-in to the development, this condition is a PRE-COMMENCEMENT condition.

7 Foul Water Drainage

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

REASON: To ensure that there would be adequate infrastructure in place for the disposal of foul water arising from the development. To ensure that measures are agreed and put in place to dispose of foul water arising from the development, this condition is a PRE-COMMENCEMENT condition.

8 Contamination

No construction in area 4 (as shown on DWG: BRD2370-0D10 Rev B) shall take place until a scheme ('the first scheme') for identifying, managing and disposing of any potential contamination hazards found during ground works has first been submitted to, and agreed in writing by, the local planning authority. The scheme should include previously submitted details for areas 1-3 (as shown on DWG: BRD2370-0D10 Rev B), as well as details for area 4.

No development shall take place until a scheme ('the second scheme') for the management of contamination risk at the site (areas 1-4) has first been submitted to, and agreed in writing by, the local planning authority. The second scheme shall include the following:

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

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

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

9 Levels

No development shall take place, other than works of demolition, shall commence until details of levels of the proposed buildings, roads and footpaths in relation to the adjoining land and highways, and any other changes proposed in the level of the site, have been submitted to and agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with the details so agreed.

REASON: To ensure that the works are carried out at suitable levels in relation to the highway and adjoining properties in the interests of the amenity of neighbouring residents, the appearance of the development, drainage, gradient of access and future highway improvement. To ensure that appropriate site levels are agreed before the superstructure commences on site, this condition is a PRE-COMMENCEMENT condition.

10 Piling method statement

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

REASON: To ensure that the culvert is in a safe condition for the life time of the development and to prevent an increase in flood risk on site and to third parties.

11 Materials

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

- a) facing brickwork: detailed elevations are required for each building type, demonstrating the proposed arrangement of each type of brickwork and the bond details;
- b) All other facing materials;
- c) windows/ doors, including those to all servicing areas;
- d) balcony screens including balustrade detail, privacy screens and soffits;
- e) boundary treatment including all pedestrian/ access gates ;
- f) ground surfacing;
- g) pergolas between villas raised planters; and
- h) external seating.

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

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

12 Materials sample panel

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

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

13 Refuse Strategy

The development hereby approved shall not progress beyond damp proof course level until a Refuse Management Plan has been submitted to, and approved in writing by the local planning authority showing the location of the refuse collection points within the development site. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure adequate provision for refuse bins to serve the development and to safeguard the appearance and character of the surrounding area.

14 Noise Mitigation

The development relating to the buildings fronting Harrow View (being blocks A, J and S) hereby approved shall not progress beyond damp proof course level until a report identifying those residential premises within the development that require mitigation of external noise levels and detailing the mitigation required to achieve satisfactory noise levels within those premises (and to their private balcony areas, where relevant) has first been submitted to the Local Planning Authority to be agreed in writing. The report shall also detail the arrangements for ventilating the residential premises so identified. The development shall be carried out in accordance with the report so agreed, and shall be retained as such thereafter.

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

15 Revised Landscape Strategy

Notwithstanding the details that have been submitted, the development hereby approved shall not progress beyond damp proof course level until a revised landscaping strategy, which increases the amount of soft landscaping and planting across the site has first been submitted to the Local Planning Authority in writing to be agreed. The revised landscape strategy shall include a revised landscaping layout, details of planting, hard surfacing materials, a space-sharing strategy, location of external cycle parking, public seating and details of all gradients, ramps and steps within publicly accessible areas of the development. Soft landscaping works shall include: planting plans (at a scale not less than 1:100), written specification of planting and cultivation works to be undertaken and schedules of plants, noting species, plant sizes and proposed numbers / densities and an implementation programme.

The landscaping scheme shall also include details of defensible space in front of ground floor units, proposed finished site levels and gates (including gates to the basement), vehicle and pedestrian access and circulation areas, minor artefacts and structures (such as play equipment, furniture, refuse storage, signs and lighting).

The above details shall be provided for each of the areas within the development site including:

- a) courtyard areas between Blocks S,T, and R, and Blocks J, K, L and M.
- b) areas between villas- including specific detail and drawings demonstrating the proposed pergolas;
- c) car parking areas- providing 1 tree per 4/5 spaces; and,
- d) green link and area of open space.

The development shall be carried out in accordance with the approved scheme and shall be retained as such thereafter.

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

public realm within the Heart of Harrow.

16 Overheating

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

REASON: To ensure a high standard of residential quality for future occupiers of the development.

17 Combined heat and power plant testing

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

REASON: To ensure that the emissions from the combined heat and power system comply with the standards published at Appendix 7 of the Mayor of London's Sustainable Design & Construction supplementary planning document (2014).

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19 Combined heat and power plant testing specification

The development hereby approved shall not progress beyond damp proof course level until a specification and drawings of the external part of the flue of the combined heat and power system has first been submitted to the Local Planning Authority to be agreed in writing. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

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

20 Living Roofs

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

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

REASON: To ensure that the development makes appropriate provision for the protection, enhancement, creation and management of biodiversity within the Heart of Harrow.

21 Biodiversity enhancements

The development hereby approved shall not progress beyond damp proof course level until proposals for increasing the availability of artificial bird, bat and invertebrate shelter opportunities within the site shall be submitted to, and agreed in writing by the Local Planning Authority. Bird nesting places shall cater for bird species identified in Table 6 off the Harrow Biodiversity Action Plan 2015-2020. The development shall be carried out in accordance with the proposals so agreed and shall be retained as such thereafter.

REASON: To ensure that the development makes appropriate provision for the protection, enhancement, creation and management of biodiversity within the Heart of Harrow.

22 Lighting strategy

The development hereby approved shall not progress beyond damp proof

course level until details of the lighting of all public realm and other external areas (including buildings) within the site has first been submitted to the Local Planning Authority to be agreed in writing. The details shall include details of the intensity of light emissions (including the surface area to be illuminated), detailed drawings of the proposed lighting columns and fittings, information about the levels of luminance and any measures for mitigating the effects of light pollution.

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

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

23 Cycle parking

The development hereby approved shall not be occupied until revised details of the proposed cycle storage demonstrating the use of Sheffield stands and traditional stacking racks has first been submitted to the Local Planning Authority to be agreed in writing. The cycle parking shall be implemented on site in accordance with the phasing details and shall be retained for the lifetime of the development.

REASON: To ensure the satisfactory provision of safe cycle storage facilities, to provide facilities for all the users of the site and in the interests of highway safety and sustainable transport. To ensure that cycle parking facilities would be available for all users of the site on immediate occupation of any of the buildings.

24 Access to buildings

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

REASON: To ensure that the development achieves a high standard of residential quality for future occupiers of the development.

25 Detailed design of play space

The residential premises hereby approved shall not be occupied until a play strategy for the site has first been submitted to the Local Planning Authority to be agreed in writing. Such details shall comprise: a specification of all play equipment to be installed including provision for children with disabilities and special sensory needs; a specification of the surface treatment within the play areas; and arrangements for ensuring the safety and security of children using the play areas. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

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

26 Landscape management and maintenance

The development hereby approved shall not be occupied until a scheme for the on-going management and maintenance of the soft landscaping within the development, to include a landscape management plan, including long term design objectives, management responsibilities and maintenance schedules for a minimum period of 5 years for all landscape areas, and details of irrigation arrangements and planters, has first been submitted to the Local Planning Authority to be agreed in writing. The development shall be carried out in accordance with the scheme so agreed and shall be retained as such thereafter.

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

27 Landscape implementation

All hard landscaping for each phase of the development (as per the approved Phasing Plan, 15.101.107) shall be carried out prior to the occupation of any part of the development in that phase, or in accordance with a programme that has been submitted to the Local Planning Authority in writing to be agreed. All soft landscaping works including planting, seeding or turfing comprised in the approved scheme of landscaping shall be carried out no later than the first planting and seeding season following the final occupation of the residential parts of the buildings, or the completion of the development, whichever is the sooner. Any existing or new trees or shrubs which, within a period of 5 years from the completion of the development, die, are removed, or become seriously damaged, diseased or defective, shall be replaced in the next planting season, with others of a similar size and species, unless the local authority agrees any variation in writing.

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

management of biodiversity with the Heart of Harrow.

28 Public realm

The development hereby approved shall not be first occupied until a plan for the management, maintenance and use of the public realm, including the green link and area of open space, has first been submitted to the Local Planning Authority to be agreed in writing. The public realm shall be managed and used in accordance with the plan so agreed.

REASON: To ensure that the development is managed and maintained to create a high quality, accessible, safe and attractive public realm throughout the lifetime of the development, and to ensure that there are adequate arrangements in place for appropriate events and functions to take place within the public realm.

29 Water Strategy

No residential occupation of the development hereby permitted shall occur until a Water Strategy, demonstrating that the mains water consumption of the proposed development will not exceed 105 litres per person per day (excluding an allowance of 5 litres or less per person per day for external water consumption), has first been submitted to the Local Planning Authority to be agreed in writing.. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development makes efficient use of mains water in accordance with Policy 5.15 of the London Plan (2016) and Policy DM 10 of the Development Management Policies Local Plan 2013.

30 Parking management plan

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

REASON: To ensure that the development provides sufficient electric vehicle charging points and adequate, secure and (where appropriate) weather protected cycle parking.

31 Air Quality

The development hereby approved shall not be occupied until the suitable mitigation measures for that phase of the development have been implemented to reduce the exposure of future occupants to pollution and improve the suitability of the development for its proposed use in accordance with the approved Air Quality Assessment have been implemented in full.

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

32 Communal Facilities:

The development hereby approved shall not progress beyond damp proof course level until details of a strategy for the provision of communal facilities for television reception (eg. Aerials, dishes and other such equipment) for the apartment blocks have been submitted to and approved in writing by the Local Planning Authority. Such details shall include the specific size and location of all equipment. The approved details shall be implemented prior to the first occupation or the relevant phase and shall be retained thereafter. No other television reception equipment shall be introduced onto the walls or the roof of the building without the prior written approval of the Local Planning Authority.

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

33 Secure by design accreditation

Evidence of certification of Secure by Design Accreditation (silver or gold) for the development shall be submitted to and approved in writing by the Local Planning Authority before any part of the development is occupied or used.

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

34 Appearance of the buildings

The development hereby approved shall not progress beyond 150mm above ground level until details of any extraction flues, ventilation systems and rainwater disposal systems (including downpipes) have been submitted to and approved in writing by the Local Planning Authority. The application shall be implemented in full accordance with such details and be maintained thereafter.

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

35 Part M Dwellings (106)

A minimum of 10% of the units shall be built in accordance with Building

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

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

36 Refuse Collection

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

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

37 Storage

The residential premises hereby approved shall each be provided with a storage space in accordance with the Mayor of London's Housing SPG (2016) unless otherwise agreed in writing by the local planning authority.

REASON: To ensure that the development achieves a high standard of residential quality for future occupiers of the development.

38 Noise levels

Unless otherwise agreed in writing by the Local Planning Authority, the individual and cumulative rating level of noise emitted from plant and/or machinery at the development hereby approved shall be at least 10dB below the existing background noise level. The noise levels shall be determined at the nearest residential property. The measurements and assessment shall be made in accordance with British Standard 4142 Method for rating industrial noise affecting mixed residential and industrial areas. Before any plant is used, measurements of the noise from the plant must be taken and a report / impact assessment demonstrating that the plant (as installed) meets the design requirements, shall be submitted to be approved in writing by the Local Planning Authority.

REASON : To ensure that the development achieves a high standard of amenity for future occupiers of this and the neighbouring buildings.

39 Energy Statement

The development shall be undertaken in accordance with the approved Energy Strategy (Calford Seadon, Nov 2017 Rev 1.7). Within 3 months (or other such period agreed in writing by the local planning authority) of the final completion of the development a post construction assessment shall be undertaken demonstrating compliance with the approved Energy Statement; which thereafter shall be submitted to the local planning authority for written approval.

REASON: To ensure the delivery of a sustainable development.

INFORMATIVES:

1 Policies

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

London Plan 2016: 2.13, 2.14, 2.15, 3.1, 3.3, 3.5, 3.6, 3.8, 3.9, 3.11, 3.12, 3.16, 4.7, 4.8, 4.9, 4.12, 5.2, 5.3, 5.4A, 5.6, 5.7, 5.9, 5.10, 5.11, 5.12, 5.13, 5.14, 5.15, 5.18, 5.21, 6.3, 6.9, 6.10, 6.13, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.7, 7.8, 7.12, 7.13, 7.14, 7.15, 7.19, 7.21, 8.2.

Draft London Plan (2017): SI1, SI2, SI3, SI4, SI5, SI7, D1, D2, D3, D4, D5, D6, G1, T4, T5, T6, T6.1, H1, H5, H7

Harrow Local Plan:

Core Strategy: CS1, CS2;

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

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

2 Pre-application engagement

Statement under Article 35(2) of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This decision has been reached in accordance with paragraphs 187-189 of The National Planning Policy Framework. Pre-application advice was sought and provided and the submitted application was in accordance with that advice.

3 Wheelchair Homes

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

4 Thames Water

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

5 Thames Water

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

6 Flank windows

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

7 Considerate Contractor Code of Practice

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

8 The Party Wall etc. Act 1996

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

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

and that work falls within the scope of the Act. Procedures under this Act are quite separate from the need for planning permission or building regulations approval. "The Party Wall etc. Act 1996: Explanatory booklet" is available free of charge from: Communities and Local Government Publications, PO Box 236, Wetherby, LS23 7NB. Please quote Product code: 02 BR 00862 when ordering. Also available for download from the CLG website: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/133214.pdf> Tel: 0870 1226 236, Fax: 0870 1226 237, Textphone: 0870 1207 405, E-mail: Ucommunities@twoten.comU4T

9 Plans

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

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

- You will be in breach of planning permission if you start development without complying with a condition requiring you to do something before you start. For example, that a scheme or details of the development must first be approved by the Local Planning Authority.
- Carrying out works in breach of such a condition will not satisfy the

requirement to commence the development within the time permitted.

- Beginning development in breach of a planning condition will invalidate your planning permission.

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

11 Mayoral Community Infrastructure Levy

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

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

12 Harrow Community Infrastructure Levy

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

Harrow's Charges are:

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

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

Retail (Use Class A1), Financial & Professional Services (Use Class A2),

Restaurants and Cafes (Use Class A3) Drinking Establishments (Use Class

A4) Hot Food Takeaways (Use Class A5) - £100 per sqm

All other uses - Nil.

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

13 Approved Plans and Documents

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

Cover Letter 15 Nov 2017; Planning Statement Nov 2017; Housing Statement 15 Nov 2017; Secured by Design Letter 9 Nov 2017; Statement of Community Engagement Nov 2017; 15.101.100 rev 39; 15.101.101.TP; 15.101.102 rev 39; 15.101.103 rev 39; 15.101.105 rev 39; 5.101.1000 rev d; 15.101.1001; 15.101.107; 15.101.A01 rev I; 15.101.A01 rev H; 15.101.A02 rev D; 15.101.B01 rev e; 15.101.C01 rev e; 15.101.D01 rev e; 15.101.E01 rev e; 15.101.F01 rev f; 15.101.F02 rev d; 15.101.G01 rev f; 15.101.G02 rev d; 15.101.H01 rev h; 15.101.J01 rev h; 15.101.J02 rev d; 15.101.K01 rev f; 15.101.K02 rev c; 15.101.L01 rev h; 15.101.L02 rev d; 15.101.M01 rev I; 15.101.M02 rev E; 15.101.N01 rev I; 15.101.O.01 rev F; 15.101.O.02 rev D; 15.101.P.01 rev F; 15.101.P.02 rev D; 15.101.Q.01 rev F; 15.101.Q.02 rev D; 15.101.R.01 rev I; 15.101.R.02 rev E; 15.101.S.01 rev I; 15.101.S.02 rev H; 15.101.S.03 rev D; 15.101.T.01 rev H; 15.101.T.02 rev G; 15.101.T.03 rev E; 15.101.U.01 rev F; 15.101.U.02 rev D; 5.101.V.01 rev F; 15.101.V.02 rev D; 15.101.W.01 rev F; 15.101.W.02 rev D; 15.101.X.01 rev E; 15.101.X.02 rev d; 15.101.Z.01 rev H; 15.101.500 rev F; 15.101.HTB rev A; 15.101.HTB2.0 rev A; 15.101.TS.01 rev A; 15.101.TS.02 rev A; Harrow Plot by Plot Schedule rev 26; 15.101.104.RM rev 39; 15.101.SN.01; 15.101.SN.02; 15.101.SN.03; 15.101.SN.04 rev A; 15.101.SN.05; 13/11/2017 rev 2; JSL2480_7001B; JSL2480_7002C; JSL2480_7003C; JSL2480_7004B; JSL2480_7005B; JSL2480_7001A; JSL2480_7002A; JSL2480_7003A; JSL2480_7004A; JSL2480_7005A; JSL2480_7000 rev A; Daylight, Sunlight & Overshadowing Report (HLEU51653/002Rv2); Heritage Statement Addendum Aug 2017 (JCH00184A); Landscape Strategy (JSL2480_1000C); JSL2480_1001C; JSL2480_1002B; JSL2480_1003B; JSL2480_1004B; JSL2480_2001B; JSL2480_2002C; JSL2480_5001B; JSL2480_5002B; JSL2480_2003B; JSL2480_5004B; JSL2480_5005B; JSL2480_5006B; JSL2480_5100B; JSL2480_6000B; Landscape/ Townscape and Visual Appraisal May 2017 (JSL2480_172B); Noise Assessment for a Proposed Energy Centre at Harrow View West 4 Dec 2017 (JAE9005-CHP-REPORT-01-R0); Materials Strategy Nov 2017; Heritage Impact Assessment June 2015 (109750.01); Heritage Impact Assessment Addendum July 2016 (109753.01); Energy Strategy, Nov 2017 (G6/FV/K160258) rev 1.7; Flood Risk Assessment Nov, 2017 Parts 1-3, issue 2; Foul Sewerage Assessment July 2017, issue 1; Transport Assessment 7 Nov 2017, issue 7; Letter in response to TFL's consultation response, dated 31 October 2017; Vehicle Tracking of a Fire Appliance (P841/14); Vehicle Tracking of a Large Refuse Vehicle (P841/02) rev a; Residential Travel Plan 8 Nov 2017, issue 4; site contamination (BRD2370-let9); Complete Utilities Report 1 Aug 2017; Viability Review (Commercially Sensitive) 2 Nov 2017; Aerial Artists Impression; Harrow GCIs.

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