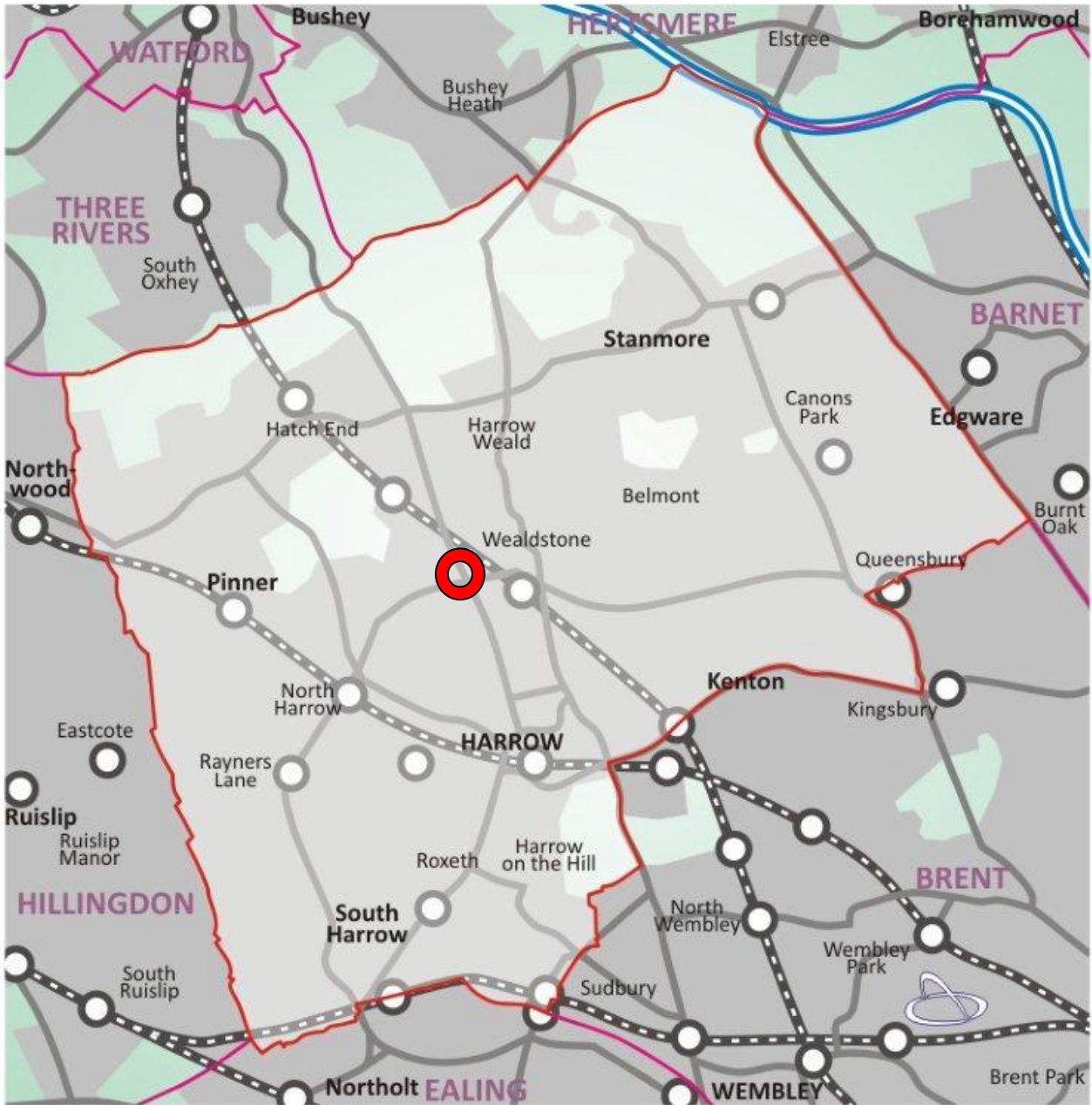
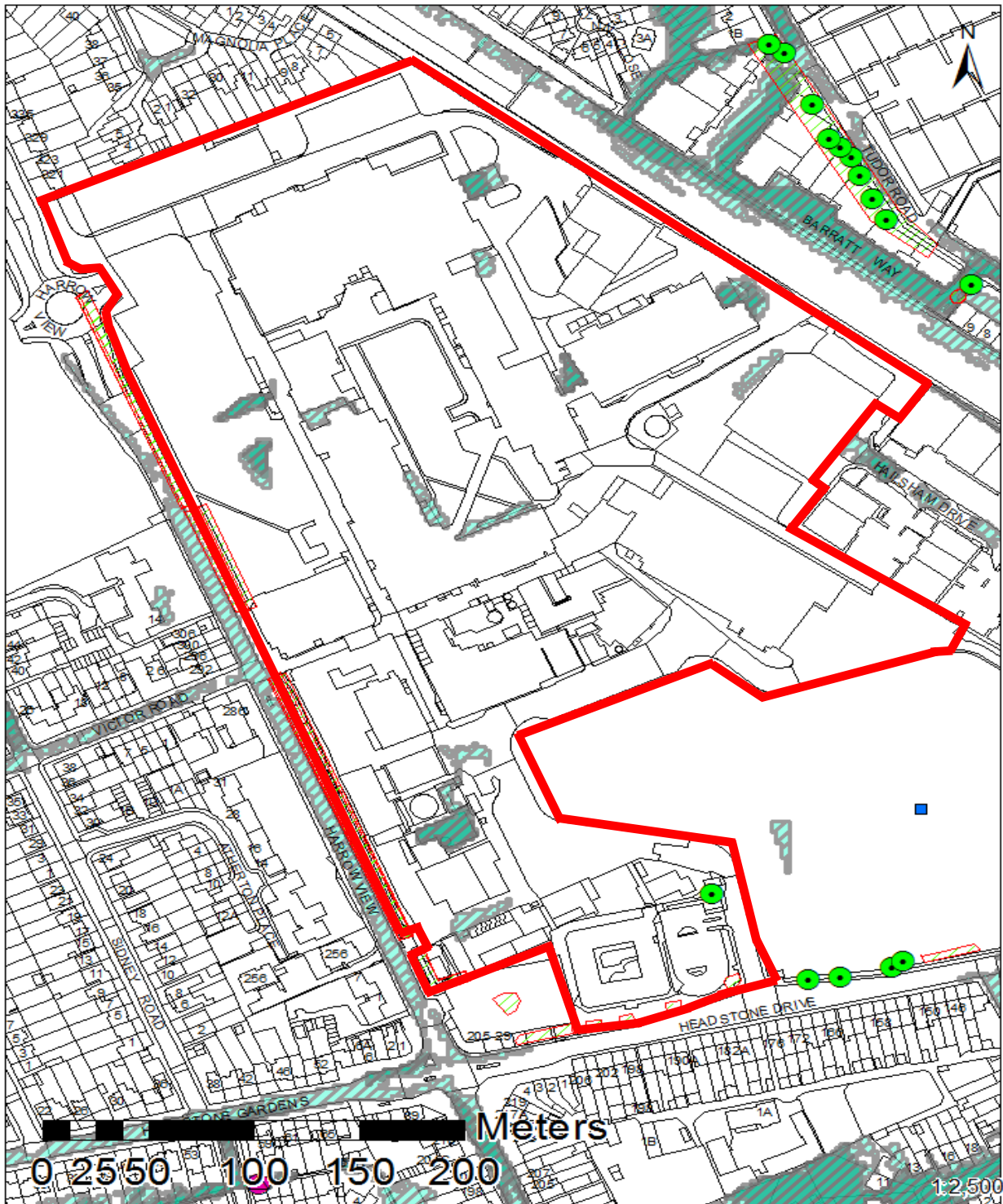


 = application site



<b>Harrow View East, (former Kodak site), Plot D7, Headstone Drive, Harrow</b>	<b>P/5079/17</b>
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<p><b>Harrow View East, (former Kodak site), Plot D7, Headstone Drive, Harrow</b></p>	<p><b>P/5079/17</b></p>
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## LONDON BOROUGH OF HARROW

### PLANNING COMMITTEE

24<sup>th</sup> January 2018

**APPLICATION NUMBER:** P/5079/17  
**VALIDATE DATE:** 07/11/2017  
**LOCATION:** PLOT D7, DEVELOPMENT ZONE D HARROW VIEW EAST (FORMER KODAK FACTORY SITE) HEADSTONE DRIVE, HARROW  
**WARD:** MARLBOROUGH  
**POSTCODE:** HA1 4TY  
**APPLICANT:** HARROW VIEW LLP  
**AGENT:** CARTER JONES  
**CASE OFFICER:** SUSHILA BHANDARI  
**EXPIRY DATE:** 06/02/2018

#### **PURPOSE OF REPORT/PROPOSAL**

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

*Approval of all reserved matters for development plot D7 and the Green Link of Development Zone D of the Harrow View East Masterplan and details pursuant to conditions 7(Urban Design Report), 8(Energy Strategy), 9(Ecology and Biodiversity Strategy), 11(Housing Schedule), 12(Daylight and Sunlight Assessment), 13(Surface Water Drainage Strategy), 14(Accessibility Strategy), 15(Lighting Strategy), 16(Refuse Strategy), 17(Noise and Vibration Strategy), 18(Arboreal Strategy), 19(Landscaping), 20(Transport Strategy), 21(Levels), 22(Open Space Strategy) following outline planning permission granted under P/2165/15 dated 09.12.2015 for the comprehensive phased, mixed use development of land bounded by Harrow View and Headstone Drive (known as Harrow View East)*

The Planning Committee is asked to:

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

#### **REASON FOR THE RECOMMENDATIONS**

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

The principle of development has been established under outline planning permission P/2165/15 which was approved by the Planning Committee in 2015. The outline permission was granted with all matters reserved for a comprehensive mixed use redevelopment of the Kodak Factory Site. This reserved matters application solely relates to development plot D7 (which is located in Development Zone D on the approved parameter plans) of the approved masterplan. Plot D7 is located along the western edge of the former factory site and fronts Harrow View.

The applicant is seeking the approval of reserved matters relating to scale, appearance, access, layout and landscaping in respect of development plot D7 and the green link and it also seeks to discharge a number of conditions that are required at the reserved matters application stage.

The redevelopment of the site is in essence the next phase of redevelopment of the wider masterplan and would be delivered alongside Phase A of the masterplan which was approved by the Planning Committee in December 2017. Other than the provision of the green link, development plot D7 would be a residential led redevelopment, delivering 460 new homes, of which 40 percent would be affordable housing. The redevelopment of this part of the former factory site would support the delivery of the wider masterplan and would support the wider regeneration of the surrounding area.

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

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

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

## **INFORMATION**

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

Statutory Return Type:	Strategic Major Application
Council Interest:	Footpath along Harrow View owned by the local authority.
GLA Community Infrastructure Levy (CIL) Contribution (provisional):	Nil
Local CIL requirement:	Nil

## **HUMAN RIGHTS ACT**

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

## **EQUALITIES**

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

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

## **S17 CRIME & DISORDER ACT**

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

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

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

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

Officer Report:

Part 1: Planning Application Fact Sheet

Part 2: Officer Assessment

Appendix 1 – Conditions and Informatives

Appendix 2 – Transport for London Comments

Appendix 3 – Site Plan

Appendix 4 – Site Context Plan

Appendix 5 – Plans and Elevations

## OFFICER REPORT

### PART 1: Planning Application Fact Sheet

The Site	
<b>Address</b>	Plot D7, Development Zone D, Harrow View East (Former Kodak Factory Site, Headstone Drive, Wealdstone, Harrow, HA1 4TY)
<b>Applicant</b>	Harrow View LLP
<b>Ward</b>	Marlborough
<b>Local Plan allocation</b>	N/A
<b>Conservation Area</b>	N/A
<b>Listed Building</b>	N/A
<b>Setting of Listed Building</b>	N/A
<b>Building of Local Interest</b>	N/A
<b>Tree Preservation Order</b>	TPO No. 874
<b>Other</b>	

Housing		
<b>Density</b>	<b>Proposed Density hr/ha</b>	387hr/ha
	<b>Proposed Density u/ha</b>	129 units/ha
	<b>PTAL</b>	2-3
	<b>London Plan Density Range</b>	70-170 dwellings/ha
<b>Dwelling Mix</b>	<b>Studio (no. / %)</b>	4 / 0.87%
	<b>1 bed (no. / %)</b>	131 / 28.48%
	<b>2 bed (no. / %)</b>	257 / 55.87%
	<b>3 bed (no. / %)</b>	62 / 13.48%
	<b>4 bed (no. / %)</b>	6 / 1.30%
	<b>Overall % of Affordable Housing</b>	40.4%
	<b>Social Rent (no. / %)</b>	113 / 24.6%
	<b>Intermediate (no. / %)</b>	73 / 15.9%
	<b>Private (no. / %)</b>	274 / 59.6%
	<b>Commuted Sum</b>	N/A
	<b>Comply with London Housing SPG?</b>	Yes
<b>Comply with M4(2) of Building Regulations?</b>	Yes	

<b>Non-residential Uses</b>		
<b>Existing Use(s)</b>	<b>Existing Use / Operator</b>	B2 / Formerly operated by Kodak
	<b>Existing Use Class(es) sqm</b>	43,139 sqm
<b>Proposed Use(s)</b>	<b>Proposed Use / Operator</b>	N/A
	<b>Proposed Use Class(es) sqm</b>	N/A
<b>Employment</b>	<b>Existing number of jobs</b>	N/A
	<b>Proposed number of jobs</b>	N/A

<b>Transportation</b>		
<b>Car parking</b>	<b>No. Existing Car Parking spaces</b>	N/A
	<b>No. Proposed Car Parking spaces</b>	185
	<b>Proposed Parking Ratio</b>	1 space: 0.4 units
<b>Cycle Parking</b>	<b>No. Existing Cycle Parking spaces</b>	N/A
	<b>No. Proposed Cycle Parking spaces</b>	Minimum of 797
	<b>Cycle Parking Ratio</b>	1.73 spaces: 1 unit
<b>Public Transport</b>	<b>PTAL Rating</b>	2-3
	<b>Closest Rail Station / Distance (m)</b>	Harrow and Wealdstone Station / 800m (as the crow flies)
	<b>Bus Routes</b>	H9, H10, H14
<b>Parking Controls</b>	<b>Controlled Parking Zone?</b>	The streets to the south east of the site on the southern side of Headstone Drive has an existing Controlled Parking Zone.
	<b>CPZ Hours</b>	Mon-Fri 10-11am
	<b>Previous CPZ Consultation (if not in a CPZ)</b>	N/A
	<b>Other on-street controls</b>	Double yellow lines on some surrounding streets.
<b>Parking Stress</b>	<b>Area/streets of parking stress survey</b>	N/A
	<b>Dates/times of parking stress survey</b>	N/A
	<b>Summary of results of</b>	N/A



	<b>survey</b>	
<b>Refuse/Recycling Collection</b>	<b>Summary of proposed refuse/recycling strategy</b>	All communal refuse stores are located on ground floor close to residential entrances. All houses and majority of ground floor apartments will have individual stores in front gardens. Refuse vehicles will enter Plot D7 from Headstone Drive and sufficient space is provided for vehicles to enter each court, turn within the court, and re-enter the street in forward gear.

<b>Sustainability / Energy</b>	
<b>BREEAM Rating</b>	N/A – Applicable only to phases including non-domestic buildings
<b>Development complies with Part L 2013?</b>	Yes – 36.78% reduction
<b>Renewable Energy Source / %</b>	N/A

<b>Education</b>		
<b>No. of Pupils</b>	<b>Existing</b>	N/A
	<b>Proposed</b>	N/A
<b>No. of Forms of Entry</b>	<b>Existing</b>	N/A
	<b>Proposed</b>	N/A
<b>No. of Staff</b>	<b>Existing</b>	N/A
	<b>Proposed</b>	N/A
<b>No. of Classrooms</b>	<b>Existing</b>	N/A
	<b>Proposed</b>	N/A
<b>Outdoor space (m2)</b>	<b>Existing</b>	N/A



## **PART 2: Assessment**

### **1.0 SITE DESCRIPTION**

- 1.1 The application site is located centrally in the Borough, has a total area of 16.65 hectares and comprises the Kodak industrial site (inclusive of operational and vacant areas) and adjacent highway land on Harrow View and Headstone Drive.
- 1.2 This reserved matters application specifically relates to the land (circa 3.94 ha) located to the western section of the overall factory site and known as development plot D7 for the purposes of the masterplan approved under outline permission P/2165/15.
- 1.3 The northernmost and easternmost part of the Kodak industrial site and a small section of land located on the southwest corner of the site are designated as a Strategic Industrial Location (SIL) in the Harrow and Wealdstone AAP and the Harrow Local Area Map. The area of land outside of the SIL comprises vacant/cleared site areas, as well as operational buildings of up to 57 metres in height and associated plant.
- 1.4 The site lies within the wider Harrow and Wealdstone Opportunity Area, as defined in the London Plan and in terms of area is the largest strategic site in this designation. In addition, the site falls within the Wealdstone West sub area Site 2 (Kodak and Zoom Leisure). The site allocates a minimum output of 1,230 jobs and 985 new homes to be achieved through a comprehensive mixed use led redevelopment of the site.
- 1.5 The operational land is occupied by a range of industrial, logistical and administrative office buildings. There is also a variety of associated plant and machinery on the site, including the main powerhouse chimney, which is the tallest structure on the site.
- 1.6 On the eastern edge of the site, adjacent to the railway line and to the north of the Waverley Industrial estate, is the underground bunker element of a former Air Ministry citadel building, which is locally listed.
- 1.7 The site slopes up from south to north, with maximum levels difference of approximately 6.2 metres. There is a drop in levels from the site down to Harrow View of between 1 and 1.5 metres.
- 1.8 The site benefits from two existing vehicle accesses, one from Harrow View and the principal access from Headstone Drive, adjacent to Kodak's existing Reception Building.
- 1.9 The site contains a number of protected trees, including a row of Limes adjacent to the western boundary of the site with Harrow View.

## 2.0 **PROPOSAL**

- 2.1 The application relates to the submission of details in relation to scale, layout, appearance, access and landscaping which were reserved pursuant to the outline permission granted under P/2165/15 in respect of development plot D7 of the approved parameter plan.
- 2.2 This application also includes full details in respect of the proposed green link which formed part of the fixed parameters of the outline permission.
- 2.3 In addition to the above, this application also seeks approval of details pursuant to the following conditions, which are required to be submitted with the reserved matters application:  
Condition 7 – Urban design report  
Condition 8 – Energy Strategy  
Condition 9 – Ecology and biodiversity Strategy  
Condition 11 – Housing schedule  
Condition 12 – Daylight and sunlight assessment  
Condition 13 – Surface water drainage strategy  
Condition 14 – Access strategy  
Condition 15 – Lighting strategy  
Condition 16 – Refuse Strategy  
Condition 17 – Noise and vibration strategy  
Condition 18 – Arboricultural strategy  
Condition 19 – Landscaping  
Condition 20 – Transport strategy  
Condition 21 – Levels  
Condition 22 – Open space strategy
- 2.4 The proposed scheme would comprise a total of 460 new homes ranging from studio units to 4 bedroom units, of which 187 units would be affordable homes. This would be split as 111 affordable rented units and 76 shared ownership (intermediate) units.
- 2.5 For information, the outline permission establishes the following parameters which are fixed for Development Zone A:
- Employment (use classes B1, B2, B8) – maximum 10,240sqm;
  - Residential (use class C3) – maximum 800 homes;
  - Senior living (use class C2) – maximum 4,730sqm;
  - Community centre (use class D1/D2) – maximum 550sqm;
  - Multi-storey car park (use class sui-generis) – maximum 8,900sqm;
  - Energy centre (use class sui generis) – maximum 300sqm; and
  - Green link – minimum 10,369sqm.
- 2.5 The proposal would comprise five groups of buildings referred to as Blocks B, C, D, E and F. All blocks would be flanked by Harrow View to the west and the proposed green link to the east.

- 2.6 Block B would be located to the southernmost part of plot D7, near to Goodstone Court. Block B would comprise two buildings, B1 and B2, which are linked by gallery access flats. Block B1 would be 6 storeys in height, fronting the green link and would comprise 37 dwellings, all of which would be affordable rented accommodation. Block B2 is an 'L' shaped 4 storey building that would front the proposed parking court to the north and Harrow View to the West and would comprise 14 intermediate tenure units. A communal residential garden would be provided at the centre of Block B.
- 2.7 Blocks C, D and E would comprise of two apartment buildings fronting Harrow View to the west and the green link to the east, which would be linked by 4 houses on either side. A communal garden is proposed in the centre of each block. Blocks C1, D1 and E1, fronting the green link would be 6 storeys in height and would each consist of 43 dwellings. Blocks C2, D2 and E2, fronting Harrow View would be 4 storeys in height and would consist of 27 dwellings each. Private tenure is proposed for Blocks C1, C2, D1 and D2. Blocks E1 and E2 would consist of affordable rent units.
- 2.8 Block F would be located to the northern section of Plot D7 and would comprise of four apartment buildings. Block F1 would be the tallest building at 10 storeys in height fronting the green link to the north and east. This block would consist of 73 dwellings, all in private tenure. Block F2 would be 6 storeys in height fronting the green link to the east and the parking court to the south and would consist of 38 dwellings (also in private tenure). Block F3 would front Harrow View to the west and the parking court to the south and would be 6 storeys in height. This block would consist of 38 dwellings, all of which would be intermediate housing. Block F4 would also be 6 storeys in height fronting Harrow View to the west and the green link to the north. This block would consist of 19 intermediate dwellings and 7 private sale dwellings. The buildings would be linked by a podium garden, with parking underneath.
- 2.9 The proposed green link would run parallel with the five blocks and would provide the primary access to each of the blocks. The green link would feature various paths, open space, play space and landscaped features as well as the primary vehicle access for this plot.
- 2.10 Private parking courts are proposed that would connect to the green link. These courts would act as home zones, facilitating on street parking for residents with planted edges and also featuring pedestrian access routes on to Harrow View.

### **3.0 RELEVANT PLANNING HISTORY**

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

<b>Ref no.</b>	<b>Description</b>	<b>Status and date of decision</b>
P/3405/11	Outline planning application for a	Granted 21/12/2012

	<p>comprehensive, phased, mixed use development of land at Harrow View and Headstone Drive, as set out in the Development Specification (March 2012). The development comprises the demolition of existing buildings and structures (with the exception of the chimney and part of powerhouse) and redevelopment of the site for a mix of uses comprising business and employment uses (within Use Classes B1(a), B1(b), B1(c), B2 and B8 - up to 35,975sqm); residential dwellings (within Use Class C3 - up to 985 units); student accommodation (Sui Generis use - up to 220 units); senior living accommodation (within Use Class C2); assisted living care home (within Use Class C2) (total C2 uses up to 9,300sqm); retail and restaurant uses (within Use Classes A1, A2, A3, A4 and A5 - up to 5,000sqm); commercial leisure uses (Use Class D2); community uses (Use Class D1); health centre (Use Class D1); a primary school (Use Class D1) (total D1/D2 uses up to 8,830sqm); energy centre (Sui Generis use - up to 4,500sqm); together with new streets and other means of access and circulation; highway improvements; associated parking; re-profiling of site levels; utilities diversions and connections; open</p>	
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	space; landscaping and ancillary development including infrastructure, works and facilities.	
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 9/12/2015
P/2165/15	Outline planning application (all matters reserved) for a comprehensive, phased, mixed use development of land at Harrow View and Headstone Drive (known as Harrow View East), as set out in the Development Specification (September 2015). The development comprises the demolition of existing buildings and structures (with the exception of the chimney and part of powerhouse) and redevelopment of the site for a mix of uses comprising business and employment uses (within Use Classes B1(a), B1(b), B1(c), B2 and B8) (up to 32,360 sqm); residential dwellings (within Use Class C3) (up to 1800 units); senior living accommodation and assisted living care home (both within Use Class C2) (up to 10,230 sqm);	Granted 09/12/2015

	<p>foodstore (within Use Class A1) (up to 2,000sqm); Flexible active uses (within Use classes A1-A5, B1a and D1) (up to 2,000 sqm); leisure and community uses including commercial leisure uses (Use Class D2); Community uses (Use Class D1), health centre (Use Class D1); a primary school (Use Class D1) (total D1/D2 uses up to 9,730sqm); energy centre (Sui Generis use)( up to 600sqm) (including an interim energy centre in Phase C (up to 200sqm); together with new streets and other means of access and circulation; highway improvements; associated parking (including a multi-storey car park (Sui Generis use)(up to 8,900sqm)); re-profiling of site levels; utilities diversions and connections; open space; landscaping and ancillary development including infrastructure, works and facilities.</p>	
<p>P/4367/17</p>	<p>Non-material amendment to outline permission P/2165/15 dated 9/12/15 to correct inaccurate measurements annotated on the approved parameter plans and referred to in the approved Specification and Guideline Documents, and to increase the size of the proposed energy centre (Development Zone A only).</p>	<p>Approved 26/10/2017</p>

P/5023/17	Non-material amendment to planning permission P/2165/15 dated 09/12/2015 to allow changes to access points, the green link, height locations and phasing boundaries.	Approved 20/12/2017
P/5244/17	Demolition of the existing building surrounding the factory chimney; retention of existing chimney and construction of a new single and two storey building comprising an energy centre (Sui Generis) and a flexible community space (Use Classes D1/D2)	Recommended for Grant
P/4852/17	Details pursuant to Condition 6 (Phasing Strategy - Phases B-D) of planning permission P/2165/15 dated 9.12.2015	Under consideration

#### **4.0 CONSULTATION**

4.1 A Site Notice was erected on 16/11/2017, expiring on 7/12/2017.

4.2 Press Notice was advertised in the Harrow Times on the 16/11/2017, expiring on 7/12/21017.

4.3 The application was advertised as a major application.

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

4.5 The overall public consultation period expired on 7/12/2017.

#### **4.6 Adjoining Properties**

Number of letters Sent	4227
Number of Responses Received	7
Number in Support	0



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

4.7 7 objections were received from local residents.

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

<b>Details of Representation</b>	<b>Summary of Comments</b>	<b>Officer Comments</b>
Mr Maloney Holy Trinity Church 1a Headstone Drive Harrow	Objects to the application due to: <ul style="list-style-type: none"> <li>• Not enough provision made for car parking</li> </ul>	Issues relating to parking provision are set out under the transport section of the appraisal below.
Ed Darnell 13 Queens Walk	Objects to the application due to: <ul style="list-style-type: none"> <li>• Harrow has recently had a large number of high density developments adding to over-population of area.</li> <li>• Infrastructure is not sufficient.</li> <li>• Roads are congested</li> </ul>	<p>The principle of development has already been established through the grant of outline permission under application P/2165/15 and the proposal in terms of density has already been accepted through the grant of this permission. The site is located in a key strategic site, close to public transport and the town centre and falls within the Housing Zones, where high density developments are expected to be delivered.</p> <p>In terms of infrastructure, the wider masterplan secures a number of contributions through s.106 receipts and CIL to support improvement works to the local infrastructure, including improvements to the local road network. The wider masterplan also benefits from an onsite school and health centre.</p> <p>Impact on the local roads was considered in the Transport Assessment approved under</p>

		the outline permission and appropriate mitigations are in place to reduce the level of car parking on-site and to encourage model shift to sustainable forms of transport.
Patrick Halvey 7a Victor Road Harrow	Objects to the application due to: <ul style="list-style-type: none"> <li>• Overdevelopment in the area.</li> <li>• Not sufficient infrastructure to support development</li> </ul>	These points have been addressed above.
Paresh Shah 1 Barons Mead Harrow	Objects to the application due to: <ul style="list-style-type: none"> <li>• Overdevelopment in the area.</li> <li>• Pollution will increase</li> <li>• Train station is already over load and overcrowded</li> </ul>	Matter relating to over development has been addressed above.  The Council's Environmental Health Officer has raised no concerns with regards to air quality. Furthermore the development to incorporate provision of 20% parking space for electric vehicles and allow for a further 20% spaces to be converted in future. This would be in line with the objectives of the London Plan to reduce traffic emissions by reducing the number of fuel dependant cars on the roads and move towards are more environmentally sustainable options such as electrical vehicles.
Bridget O'Conner 7 View Close Harrow	Objects to the application due to: <ul style="list-style-type: none"> <li>• Loss of privacy, noise; light</li> <li>• Pollution</li> <li>• Inadequate access and infrastructure</li> </ul>	Matters relating to loss of privacy, noise, light and access have been addressed in the appraisal below.  Matters relating to pollution and infrastructure above been addressed above.
Sharif Anwar 70 Pinner View Harrow	Whilst support the proposal of redevelopment on the	Impact on highway infrastructure is noted above.

	<p>Kodak site, object due to:</p> <ul style="list-style-type: none"> <li>• Road infrastructure and traffic</li> <li>• Pinner View, Victor Road and Pinner Park Avenue are going to come under increasing traffic problems</li> </ul>	
<p>Education and Skills Funding Authority, Department for Education Sanctuary Buildings London</p>	<p>Objections due to:</p> <ul style="list-style-type: none"> <li>• The primary school on the site was secured as part of the outline consent and forms integral element of the permitted scheme.</li> <li>• Access to school appears not to have been given due consideration in either reserved matters.</li> <li>• Both applications submitted seriously jeopardise the delivery of the school and we strongly encourage LB Harrow to reconsider the merits of both applications.</li> <li>• Currently the school only has construction access across London and Quadrant Housing Trust's site from their own new road network and only until the 'green link' is completed.</li> <li>• Rokeby Road is an adopted road up to the existing security barrier and the continuation if that road past the barrier</li> </ul>	<p>Noted – a condition has been attached to this reserved matter application dealing with operational access for the proposed school.</p>

	<p>belongs to Harrow View LLP. The school is therefore reliant on Harrow View LLP to allow school construction and operational access past the current barrier. Harrow LLP will provide the school with construction access.</p> <ul style="list-style-type: none"> <li>• Not clear if the portion of Rokeby Road past the barrier would be adopted or remain private. If it remains private then school will have no unfettered right to access its own site over Harrow View LLP land without permission.</li> <li>• Delivery of school can be resolved by planning conditions attached to both reserved matters requiring construction access and operational access.</li> </ul>	
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4.9 Statutory and Non Statutory Consultation

4.10 The following consultations have been undertaken:

LBH Environmental Health
LBH Highways
LBH Planning Policy
LBH Design
LBH Conservation Officer
LBH Tree Officer
LBH Education
LBH Landscape Architects
LBH Lighting Section
LBH Waste Officer

TFL
Historic England - GLASS
Environment Agency
Designing Out Crime Officer, Metropolitan Police Service
National Grid Transco
Thames Water Authority

4.11 External Consultation

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

<b>Consultee</b>	<b>Summary of Comments</b>	<b>Officer Comments</b>
Design Out Crime Office	<ul style="list-style-type: none"> <li>• Risk of crime within both the public and non-public areas of the proposed development, and the interactions between the two should be considered at the outset and preventative measures made.</li> <li>• Crime map shows that the area is experiencing a high volume of anti-social behaviour, burglary, violent crime and motor vehicle crime.</li> <li>• With continued consultation with a DOCO and the use of correct tested, accredited and third party certified products this development would be able to achieve Secured by Design award.</li> <li>• Therefore recommend that a planning condition is attached requiring this development to achieve Secured by Design accreditation.</li> </ul>	Noted and appropriate condition recommended.
Natural England	No comment to make on the discharge of conditions	Noted.
London Underground	No comment to make on the planning application	Noted.
Thames Water	<ul style="list-style-type: none"> <li>• Thames water has identified an ability of the existing waste water infrastructure</li> </ul>	Noted and appropriate condition attached.

	<p>to accommodate the needs of the development. A Grampian Style condition is recommended under a capacity assessment has been undertaken.</p> <ul style="list-style-type: none"> <li>• Standard advice given on surface water drainage and piling works.</li> </ul>	
Transport for London	<ul style="list-style-type: none"> <li>• TfL have raised various comments in relation to the discharge of Condition 8. Full details of these have been attached in Appendix 2 of this report</li> </ul>	<p>Noted these have been addressed in the appraisal below and the applicant has provided a response to the points raised, which have been reviewed by the Council's Highway Engineer.</p>

## 5.0 **POLICIES**

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

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

5.2 The Government has issued the National Planning Policy Framework [NPPF] which consolidates national planning policy and is a material consideration in the determination of this application.

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

5.4 On 29 November 2017, the Greater London Authority [GLA] published a draft new London Plan. This draft plan is still under formal consultation period which is due to end in March 2018. It is likely that the examination in public of the consultation responses and the draft London Plan (2017) would be undertaken in Autumn 2018. As the draft plan is still under consultation stage, the draft policies contained within the revised plan have been afforded limited weight in the assessment of this application.

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

## **6.0 ASSESSMENT**

6.1 The main issues are;

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

### 6.2 Principle of Development

6.2.1 The principle of redevelopment of the Kodak factory site has been long established through the approval of two outline permissions under refs: P/3405/11 and P/2165/15 for the comprehensive phased mixed re-development of the former factory site. Further to the outline permission granted under P/2165/15, the applicant sought a non-material minor amendment application (s.96a application) under ref: P/4367/17 to correct inaccurate measurements annotated on the approved parameter plans and referred to in the approved Specification and Guideline Documents. This application followed a detailed survey of the site which established that the onsite measurements did not correlate with the approved parameter plans. This application was approved in October 2017. Following this s.96a application, a further s.96a application (Ref: P/5023/17) was submitted and subsequently approved in December 2017. The amendments in this later application are the same as that approved under application P/4367/17, save that a minor adjustment has been made between the development plot boundary shared between zones B and D to include the full extent of the garden and shared surface route within zone D. For the purposes of this reserved matters application, the details before the local planning authority are based on the revised parameter plans, the addendum to the Design Guidelines (DG) and the addendum to the Development Specification (DS) approved under the s.96a application P/5023/17, alongside the original plans and documents approved under the substantive outline application.

6.2.2 The subject site is located within the “Heart of Harrow” which encompasses the two town centres of Harrow and Wealdstone, the Station Road corridor linking the two centres, and the industrial land and open spaces surrounding Wealdstone, including the Kodak site, Headstone Manor and the Harrow Leisure Centre.



- 6.2.3 The Heart of Harrow is now designated as an Opportunity Area in the 2016 version of the London Plan and the outline permission granted under P/2165/15 was approved on the basis of this designation. The Opportunity Area designation is expected to contribute to the delivery of 3,000 jobs and a minimum of 2,800 new homes within the Area, through higher density residential and mixed use development on key strategic.
- 6.2.4 In addition to being an Opportunity Area, the entire Heart of Harrow is also designated as a Housing Zone, which seeks to help unlock the potential to deliver more than 5,000 new homes over the plan period. Housing Zones are designed to work flexibly depending on the local circumstances, however all new developments would need to be built to high quality standards and in compliance with all relevant policies contained within the development plan. In particular, proposals will need to demonstrate how new homes will come forward in a master planned approach, delivering strong communities through urban design and achieving a coherent neighbourhood.
- 6.2.5 The Kodak factory site is identified as a development opportunity site in the AAP and falls within the Wealdstone West sub area Site 2. The site allocates a minimum output of 1,230 jobs and 985 new homes to be achieved through a comprehensive mixed use led redevelopment of the site.
- 6.2.6 The approved masterplan divides the site into four different development zones (phases), which are further split into development plots. Whilst the masterplan was granted outline permission with all matters reserved, there are certain parameters that are fixed under this outline permission, which includes the amount of open space to be provided, the heights of the buildings, access point and primary route through the site. The parameter plans also fixes the floor spaces for different uses to be provided within each development phase and the number of residential units.
- 6.2.7 This application relates to the development plot D7 (Development Zone D) of the Harrow View East masterplan approved under application P/2165/15 and forms the western part of the Harrow View East site, adjacent to Harrow View. As noted under the planning history section, the outline permission grants permission to deliver up to 1,800 new homes on this site, new employment floor space of up to 32,360sqm, a new 3 form entry primary school, up to 10,230sqm of senior living/ assisted care accommodation, a food store (up to 2,000sqm), flexible commercial floor space (up to 2,000sqm), commercial leisure, community floor space, health centre, energy centre, associated new streets, highway improvements, multi-storey car park, open space and associated landscaping.
- 6.2.8 Development plot D7, as proposed under this application, will deliver 460 new homes, alongside a substantial section of the overall green link approved under the outline permission. The green link is strategically important, forming a new route from Wealdstone town centre through the Harrow View West site to Headstone Manor. The southern section of the green link connection located in Development Zone A has recently been approved under P/4610/17.

6.2.9 As stated above, the applicant is seeking approval of all reserved matters in relation to development plot D7. Each of these matters is appraised in detail below and Officers consider that, subject to the imposition of appropriate conditions where necessary, the details before the local planning authority should be approved. In addition to the reserved matters, the applicant is also required to submit details for a number of conditions attached to the original outline permission. As discussed in detail below, Officers are of the opinion that the details submitted pursuant these conditions are acceptable and where in cases further details are still required, appropriate conditions have been recommended. Officers consider that such an approach would not prejudice the local planning authority in seeking to ensure that the detailed development meets the aspirations set out in the masterplan.

### 6.3 Regeneration

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

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

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

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

### 6.4 Character and Appearance of the Area

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

6.4.1 The London Plan (2016) policies 7.4B and 7.6B set out the design principles that all boroughs should seek to ensure for all development proposals. The London Plan policy 7.4B states, *inter alia*, that all development proposals should have regard to the local context, contribute to a positive relationship between the urban landscape and natural features, be human in scale, make a positive contribution and should be informed by the historic environment. The London Plan policy 7.6B states, *inter alia*, that all development proposals should; be of the highest architectural quality, which complement the local architectural character and be of an appropriate proportion, composition, scale and orientation. Development should not be harmful to amenities, should incorporate best practice for climate change, provide high quality indoor and

outdoor spaces, be adaptable to different activities and land uses and meet the principles of inclusive design. The ethos of these principles are carried over in the draft London Plan policies D1 and D2.

- 6.4.2 Core Policy CS1.B specifies that 'All development shall respond positively to the local and historic context in terms of design, siting, density and spacing, reinforce the positive attributes of local distinctiveness whilst promoting innovative design and/or enhancing areas of poor design; extensions should respect their host building.'
- 6.4.3 Policies AAP3 and AAP4 of the Harrow and Wealdstone Area Action Plan 2013 seeks to ensure that all development proposals achieve a high standard design and layout. Development within all three sub areas of Wealdstone as set out in the AAP will be required to *inter alia* strengthen the district centre and improve the environment and identity of the Wealdstone area as a location for business and industrial activity and for family living. Criterion E of policy AAP3 sets out the design parameters that should be taken into consideration when assessing development proposals within Wealdstone West sub area, which *inter alia* includes the plan's vision to improve the link between the west sub area of Wealdstone and the district centre, design which creates a sense of place that is related to and an extension of Wealdstone and make provision for community uses that are not appropriate to locate in the district centre.
- 6.4.4 The detailed design considerations for the Kodak site (including the Zoom Leisure site) are set out under the Site 2 allocation under Chapter 5 of the AAP. This sets out a comprehensive list of design considerations.
- 6.4.5 The applicant has also submitted an Urban Design Report (UDR) pursuant to Condition 7 which requires the following:

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

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

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

- 6.4.7 This scheme has been extensively developed through detailed pre-application discussions held with Officers, the Design Project Officer and external design consultants. It is noted that under the draft London Plan (2017), draft policy D2 sets out that in the case of new major development proposals that are referable to the Mayor and relate to development proposals that exceed the density threshold set out under draft policy D6 or exceed 30 metres in height, these must have gone at least one design review early on in their preparation. Although these policies are in draft form and still out for consultation and

therefore are afforded limited weight, the local planning authority is supportive of this approach and proactively encourages design review for all major applications.

- 6.4.8 The scheme has been presented to two different design review panels. Through each stage of the review proposal the applicant has sought to develop the scheme further in response to comments raised.
- 6.4.9 The first panel review of the initial proposals was considered in September 2017. Similar to comments raised with regards to the reserved matter application for Development Zone A, the DRP panel considered that there are shortcomings with the original masterplan and challenged the design team with regard to plot D7 to improve upon the original masterplan. In addition to this the panel raised concerns/ commented on the proposed density of the development; the character of streets and courtyards; the amenity value and aspect of the residential courtyard blocks; landscape; architecture and relationship with Harrow View.
- 6.4.10 A revised iteration of the scheme was presented a second DRP in October 2017, in which the applicant provided a response to the points raised in the first DRP. Changes were made where feasible and where the applicant's design team had a difference of opinion a full justification on their methodology was provided to the DRP.
- 6.4.11 In response to the final review, the proposals have been further developed and the scheme now under consideration has sought, where feasible, to take on board the recommendations made in the final design review. For the avoidance of duplication, the response to the final design review has been incorporated within the appraisal below. As demonstrated in the assessment below, the proposed development has progressed significantly since its initial presentation to Officers and the proposal under consideration now sets to deliver the visions of the approved masterplan within the approved parameters and design guidelines. It is acknowledged that the applicant has been open to the number of recommendations made through the review process. However, it is inevitable with the scale of development being proposed and with the constraints of the masterplan that certain recommendations could not be incorporated within the final proposal. Notwithstanding this, Officers consider (as appraised below) that the current proposals would achieve a good standard of development on the site and would support the wider regeneration of Wealdstone centre.

## ***Appraisal***

### **Scale**

- 6.4.12 The height of the buildings proposed and densities are within the parameters of the approved masterplan. As noted above the massing form has been developed through pre-application meetings, workshops, design review panels and having due regard to the approved Design Guidelines and approved parameters plans. In order to develop the scale of buildings, an assessment of the character and an analysis of the architectural language of the area were

undertaken and the applicant has set this out in their UDR. The approved Design Guidelines document set out the three proposed character areas for the Harrow View East masterplan. Development Zone D, falls within Zones 2 and 3 character area. Zone 2 being Industrial character and Zone 3 being Headstone Manor character. Plot D7 is sited within character Zone 3. However, through pre-application discussions and scheme development, it has been agreed that character reference to Headstone Manor is not an appropriate architectural response for this location as it has no direct reference to the immediate area or the character and heritage of the Kodak site itself. Furthermore, Headstone Manor is not an appropriate precedent for modern houses and mid-rise apartments. With this in mind Plot D7 has been designed to take on its own distinctive character which reflects both Wealdstone and an Industrial character.

- 6.4.13 Plot D7 proposes three character areas. Character Area 1 – Harrow View and the Courts – the character and scale of buildings in this zone would respond to the surrounding residential area. The scale of Blocks B2, C2, D2 and E2 would comprise of four storey mansion blocks to respect the scale and typology of buildings located opposite. The terraced houses fronting the courts would be three storeys in height to provide a visual break in the massing of the mansion blocks fronting Harrow View and the taller mansion blocks fronting the green link.
- 6.4.14 Character Area 2 – The Green Link – larger scale buildings are proposed along this edge to help define the edge of the green link. A series of six-storey mansion blocks are proposed to provide a consistent frontage. The scale of these blocks has been designed to respond to the scale and massing of the wider masterplan and provide appropriate scaled buildings that maximises the potential of this previously developed site and respects the scale of the surrounding area.
- 6.4.15 Character Area 3 – Block F – this block would take on an urban scale and comprise the tallest ten storey building set on the corner of the green link. The remaining group of buildings within this block would be six storeys in height. This would define the northern entrance into the green link and to provide scale of buildings that both respect the scale of surrounding neighbours as well as providing a transition between the shorter mansion blocks and the taller urban block.
- 6.4.16 The density of the development is determined by the approved masterplan. The outline permission acknowledged that the density output for this site far exceeds those set out in the AAP for this allocated site. However, the re-designation of the Heart of Harrow as an Opportunity Area in the London Plan and the designation of the Heart of Harrow as a Housing Zone, has provided the support to unlock opportunities to exploit higher density developments on strategically positioned sites such as the former Kodak Factory site.
- 6.4.17 The proposed development would achieve a density of 129 units per hectare, which would be line with the density matrix set out under policy 3.4 of the London Plan (based on a range of 70-170 units located within an urban setting with a PTAL of 2-3). It is noted that under the draft London Plan (2017), the

density ranges set out under draft policy D6 deletes any reference to the setting and habitable rooms and sets out maximum density thresholds based on the PTAL area of the site only. Although not material in the consideration of this application the new density threshold set for a PTAL area of 2-3 is 240 units per hectare.

- 6.4.18 It is acknowledged that the height and the density of proposed development will change the character of this site and the surrounding area. It is considered that this site provides a strategic opportunity for the site to create its own character and essentially form a catalyst to enhance the character and nature of this part of the Opportunity Area, which welcomes more dense forms of developments through increased scale. Officers consider that the proposal would help realise the aspirations set out in the Core Strategy and the AAP for this key strategic site, as well as meeting the aims of the Mayor's Housing Zone. On this basis, the overall scale and density of the proposed development would be acceptable within the context of the surrounding area.

#### Layout

- 6.4.19 The development plots are broadly fixed with some degree of deviation permitted and as such the positioning of the buildings are depicted by these fixed parameters. As noted under the history section above, the parameters approved under P/2165/15 were amended through a section 96a (non-material minor amendment) application, as a result of a detailed site survey undertaken of the site, which showed that the original site measurement were incorrect. Accordingly, the layout subject of this application follows on from the revised parameters plans and addendum to the Design Guidelines and Development Specification.
- 6.4.20 In the original outline application, the illustrative plot layout for D7 showed a series of block arrangements perpendicular to the green link fronting residential mews and a series of apartment blocks defining the edge of the green link. Parking was shown to be laid out partly on street for the mews dwellings and via an undercroft for the apartment blocks. Whilst the illustrative plans showed one way the development on this plot could be delivered, the parameter plans do allow for some deviation to develop other forms of layout.
- 6.4.21 The layout presented in the original outline masterplan, albeit illustrative, would have resulted in a development with a high level of inactive frontages, in particular, with regards to its relationship defined by gable ends facing Harrow View. In addition, the provision of undercroft parking would also give rise to inactive frontages fronting the green link. The design team has sought to address these shortcomings, through amending the layout and composition of the blocks to better activate the frontage on all sides. This has resulted in some deviation from the original design guidelines.
- 6.4.22 The key changes have been to the residential mews, now termed as 'residential courts', whereby the width of these courts have been increased from 17m to 22m. This has been borne as a result of facilitating on street parking and the removal of undercroft parking. As noted above, through the development of the

scheme, Officers considered that the provision of active frontages along all routes would be a preferred option and as a consequence a balanced view needs to be taken on achieving the desired level of parking on street to serve the development. On this basis the width of the street has been increased to allow for street parking on both sides and safe manoeuvring and turning along the carriageway, along with providing a footpath on each side.

- 6.4.23 In addition to the above, the defensible zone has been slightly reduced from the 2m recommended in the design guideline to 1.72m. The marginal reduction in the defensible zone is unlikely to have any discernible impact upon the future occupiers of the development. Whilst Officers note that these changes deviated from the approved design guidelines, the changes proposed are on balance considered acceptable. Furthermore as discussed below, the layout of the parking bays would be softened by the proposed soft landscaped works. The layout of the blocks and the courts has also presented an opportunity to provide a better connection with Harrow View, which is currently defined by a high perimeter boundary wall. The intentions are to reduce the height of the wall to better relate to Harrow View and offer permeability through the site. As the wall also acts as a retaining wall and there are level changes across the site, the proposals would incorporate pedestrian access in form of steps and ramped access where feasible to further enhance the connectivity with Harrow View.
- 6.4.24 The layout of the primarily shared surface route would broadly be consistent with the approved design guidelines. The only change being the provision of a footpath along the western side of the carriageway. This has been considered necessary to ensure pedestrian safety given that this route would be the only main route for access and servicing for this plot. Officers consider that this provides an appropriate solution for pedestrian safety and in this regard the minor divergence from the design guidelines would not prejudice the aspirations of the wider masterplan or the connection with the green link.
- 6.4.25 In terms of the layout of the residential blocks and the communal gardens, the proposals are considered to be acceptable. In order to activate the frontages of the blocks, the proposed layout shows entrances, both private and communal where applicable on all sides of the blocks configuration. This would ensure pedestrian movement and natural surveillance around each block. Inactivate frontages would be limited to the provision of servicing for each building and would mainly relate to the provision of refuse and cycle stores.

The upper level of Block F has been designed around a semi private courtyard podium and the layout of the units at this level have been designed where feasible to overlook both private amenity space and onto public realm and streets. Blocks B, C, D and E have ground level communal gardens. Communal entrances have been designed to have direct access to the garden through the main core serving each building. Individual houses and where feasible ground floor units would have direct access to the communal garden. The layout of the blocks would ensure natural overlooking of the communal space.

- 6.4.26 The layout of the different blocks in relationship to the different street typologies and the green link would ensure that the satisfactory distances are maintained



as per the approved parameter plans. Overall it is considered that the layout of the development would be consistent with the approved parameter plans.

### Access

- 6.4.27 Primary vehicle access to development plot D7 would be via the existing factory entrance route known as Rokeby Road connecting to Headstone Drive to the south. This route would only serve the five blocks and there would be no vehicular route through to the remaining development within the wider masterplan. Access to the individual blocks would be from the courts located off the shared surface route. The shared surfaces across the site would serve pedestrians, cyclists and motorcars, with preference given to the former two users. The green link would provide the main link from Headstone Drive to Harrow View for both cyclists and pedestrians. In order to guide such users to this route appropriate wayfinding signage would be incorporated to encourage active use of this green link. The details of which would be secured through the landscaping condition.
- 6.4.28 Overall the access to and from the site would be broadly in line with the visions set out in the design guidelines. Accessibility to buildings and open space is dealt with under the relevant section of the appraisal. It is noted that however, in order to safeguard access to the proposed school, which is located outside of the site boundary (although forms part of the wider masterplan), a condition is required under this aspect of the reserved matters to ensure that operational access to the school will be provided without any hindrance.

### Appearance

- 6.4.29 As noted above, the approved Design Guidelines document sets out the three proposed character areas for the Harrow View East masterplan. Development Zone D, falls within Zones 2 and 3 character area. Zone 2 being Industrial character and Zone 3 being Headstone Manor character. Plot D7 is sited within character Zone 3. However, through pre-application discussions and scheme development, it has been agreed that character reference to Headstone Manor is not an appropriate architectural response for this location as it has no direct reference to the immediate area or the character and heritage of the Kodak site itself. In addition, it is considered that Headstone Manor is not an appropriate precedent for modern houses and mid-rise apartments. With this in mind Plot D7 has been designed to take on its own distinctive character which reflects both Wealdstone and an Industrial character.
- 6.4.30 Having regard to the established irregularly in appearance of the buildings located opposite, the proposal seeks to use a single brick type for Blocks B2, C2, D2 and E2 and the terraced houses, in order to provide a consistent frontage along the Harrow View Frontage. Buildings would be designed with a simple façade with generous openings and projecting balconies. Buildings would be articulated by the use of brick detailing in form of corduroy brickwork. Projecting balconies fronting Harrow View would consist of patterned metal balustrade to provide privacy and would further articulate the appearance of the buildings.

- 6.4.31 Buildings B1, C1, D1 and E1, would also be constructed in simple red brick, with generous windows, projecting balconies and corduroy brickwork detail at top floor and ground floor levels.
- 6.4.32 Block F would form a group of buildings that would be constructed in a lighter buff brick type. The tallest building would incorporate reconstituted stone sills and bands to reference those used in the existing factory buildings. In the six storey buildings (F2, F3 and F3) it is proposed to incorporate continuous bands of horizontal corduroy brickwork at upper floor levels. To ventilate the car park a recessed brick detail would be used between each building.
- 6.4.33 Communal entrances to the buildings would be well defined by the use of glass reinforced concrete (GRC). It is also proposed to use GRC for the proposed bin store for the individual houses. The individual entrances to the houses would be defined by the use of metal cladding.
- 6.4.34 Overall, it is considered that the appearance, whilst modern in design would be consistent with similar high density developments found in the borough. The inclusion of specific industrial references into the built form would help to identify the site's industrial past and therefore create its own identity. However, in order to ensure a high quality finish, it is necessary to condition details for all external materials. It is also considered necessary to condition further detailed cross sections for the window reveals, large scale drawings showing the arrangement of the corduroy brick detailing and the brick bond.
- 6.4.35 No details of the arrangements for the accommodation of external services (telecommunications equipment, any extraction plant etc) have been submitted with the application. However it is considered that such details can also be adequately controlled by condition.
- 6.4.36 It is considered that details pursuant to condition 7 can also be approved as the Urban Design Report provides the approach to the design and how it addresses the relevant Design Guidelines for that phase.

### Landscaping

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

Condition 19:

*Applications for approval of Reserved Matters for each relevant phase submitted pursuant to this permission relating to layout and landscaping shall explain the approach to the landscaping for that phase in relation to the landscape principles set out in the Design and Access Statement and Design Guidelines (June 2015), including planting plans, a schedule of plants, including plant sizes and proposed numbers, as well as details of hard landscape materials, boundary treatments and street furniture.*

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

Condition 21:

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

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

Condition 22:

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

- 6.4.38 The applicant has submitted a detailed landscape strategy for all public and private areas. This application is accompanied by a Landscape Design Report, which sets out the materials proposed to form the new landscaping for the development, types of street furniture and enclosures. It also details the proposed planting strategies that seek to utilise a varied colour palette to add interest and enhance biodiversity.
- 6.4.39 According to the Landscape Design Report the landscaping master plan for plot D7 the green link would comprise three key components:
1. The Park – This will link to the proposed park on the Harrow View West redevelopment site and provide a through route to Headstone Manor. The linear park would also link to the southern green link located in Development Zone A, which is to be delivered by London and Quadrant.
  2. Residential Gardens – These would provide semi- private amenity space for residents within each block.
  3. The Courts – These would feature streetscape for residents to walk through, park cars and allow access for servicing vehicles.
- 6.4.40 The landscape strategy mainly follows the principles of the approved design guidelines. However, some minor deviations have been made to improve the quality and visibility of the park and courts. These are set out in the Landscape Design Report and Officers have no objection to the proposed changes.
- 6.4.41 The proposal has been reviewed by the Council's Landscape Architect and has provided the following feedback/ comments on the proposals:

Green Link -

- a) The proposed meadow lawn areas along the green link appear to be flat level ground spaces. The incorporation of subtle earth shaping would

create meadow mounds, which would provide interest, orientate movement and help define different areas and link to the landscape proposals for Phase A, Aperture Works.

- b) Incidental niche seating pockets are proposed along the green link and in Block F courtyard to create intimate areas for socialisation. The pocket areas appear to be dominated by hard surfacing, rather than lush green planting that would help to soften the spaces and create intimate spaces. Play Garden 3, a large expanse of hard surfacing is proposed, to the east side of the play garden, to accommodate only one seat creating a space dominated by paving. These issues need to be addressed during the detailed design, reducing the extent and size of the hard surfacing.
- c) Create footpaths that flow and are more sinuous. The footpaths should flow along the length, within and through the green link, enabling the pedestrian to have the feeling of passing through the soft natural landscape and treed area, on either side.
- d) The proposed pond feature terminating at the swale end is welcomed – however the proposed decking viewing point covers the majority of the pond surface area and would dominate the space. The decking would prevent the inclusion of a substantial area of natural planting, to enhance the biodiversity of the area. There is a lack of detail to fully understand the pond proposal. There is space available to substantially increase the size of the proposed pond, extending southwards across the green link and this pond enlargement should be incorporated into the detailed design proposals. A larger pond would provide benefits to the drainage, enable marginal and submerged planting which would enhance the biodiversity and create visual and physical interest. The footpath route would need to be directed across a new bridge over the enlarged pond. More detail is required for the pond, decking and a new bridge including a detailed plan, levels, cross sections, proposed materials and damp and water loving planting.

#### Courtyards –

- e) Complicated circulation network within Block F – the courtyards should be a place where residents can feel comfortable and want to use the space. A space that is sufficiently intimate, with a sense of enclosure and plentiful green, lush, and varied colourful planting, providing a social space where people can feel safe and secure to meet, sit, chat and relax without the feeling of being overlooked by residents. The courtyards also provide an attractive and functional pedestrian route through, however the hard paving and footpath network should not dominate. Care needs to be taken during the refinement of the detailed design to reduce the area of hard surfacing and, where possible, the extent or complexity of the footpath network. The courtyard area within Block F, in particular, is dissected by several paths with some wide expanses of hard surfacing and requires a detailed design review. Details of Irrigation system details will be required.

#### The Courts and Harrow View Entrance -

- f) The views into the courts, from Harrow View and the Courts were subject to much discussion and the final design maximizing the soft landscape space works well in breaking up the parking spaces. Although it must be noted that the space for the planting beds remains relatively small.
- g) Detailed design and the future management and maintenance of the planting and any required replacement planting will be key to success of these areas.

#### Plaza / Energy Centre -

- h) The new energy centre situated within the public plaza space will provide a focal point within the park and communal activities. The space will be predominantly hard, open and flexible and will use concrete with exposed crushed aggregate and materials from the industrial past, including bands of reclaimed bricks from the original building, a retained concrete slab and areas of cropped concrete setts. This proposal celebrating the sites previous industrial past to incorporate artefacts and remnants from the Kodak site into a contemporary space is welcomed.
- i) Method statement required to explain in detail the removal process of part of the brick retaining wall along Harrow View and any proposed rebuilding of the wall.
- j) Details of the proposed appearance and levels of the existing brick wall and how the proposed concrete retaining structures, steps, access ramps and finishes are resolved where the hole is punched through the brick wall to create the new steps and access ramps.
- k) Details of the proposed tree removal and trees to be retained in relation to the existing and proposed retaining wall along Harrow View, access and new buildings. The Arboricultural Method Statement does not appear to explain the impact on the existing trees in relation to the addition of the proposed new concrete steps and concrete features in the wall. The Method Statement needs to be updated to include the most recent finalised proposals. A Tree Constraints Plan has been submitted and detailed Tree Protection Plan, to BS 5837 is required. The protective fencing is to be installed before the start of any site clearance, demolition and development works and retained for the duration of the works.

#### Planting -

- l) A palette of proposed plant and planting plans have been produced at 1:500 and 1:200. Further detail and revisions are required, and planting plans at a scale of 1:100.

#### The Park -

- m) Glade understory planting – note Rosa canina (Dog rose) isn't shade tolerant and therefore if to be underplanted may be unsuccessful in the long term.
- n) SUDs marginal planting – an image is shown of Corylus avellana 'Contorta' (Contorted hazel) but not noted in the text – this may be an unsuitable choice. Some species may prefer damp conditions on a

permanent basis and the ground may not be wet throughout the year – species such as *Primula florindae*. Care must be taken with the plant selection to ensure the plants are suitable for a sufficiently wide range of ground conditions.

- o) The Residential Gardens - herbaceous planting – *Carex pendula* – (Pendulous sedge) is a very invasive sedge and I would suggest avoided in the gardens and omitted from the planting palette. It could be more appropriate in the SUDs areas – if a tough, invasive plant is required.

Materials -

- p) Images of composite decking have been shown for the pond and Block F. This proposed composite material requires further consideration. It is noted that timber decked communal seating areas are located in each residential garden. The proposed composite decking for Block F, across the pond and any other area where this has been proposed is to be changed to a high quality timber material, long lasting, sustainably sourced hardwood to provide an aesthetically pleasing, warm and durable hard material.

- 6.4.42 The proposals for Plot D7, Harrow View East have been the subject of several pre application meetings and the proposals in the landscape drawings in the main reflect these discussions. As noted from the comments above there is however more work to be done on refinements to the design, in particular for the courtyard areas and providing hard and soft landscape detail together with more details on play, hard materials, furniture, pergolas, lighting etc.
- 6.4.43 The hard and soft landscape, furniture, lighting, play and green link all requires a consistent and cohesive design approach and this phase needs to be linked to the adjacent landscape phases. Phase A, Aperture Works, Phase D7 and Harrow View West need to be seamlessly linked and demonstrate a consistency in approach to the landscape strategy, design and detail.
- 6.4.44 Whilst the applicant has provided an overview of the type of planting, hard/ soft landscape works and furniture details, Officers consider that sufficient level of details has not been provided in order to approve Condition 19. However, Officers are broadly comfortable with the overall intent of the landscape strategy, but consider that further work is still required as noted by the Landscape Architect above. It is therefore considered that through the imposition of further appropriate conditions, the required level of details and finishing can be secured by condition to achieve a high quality landscape design throughout.
- 6.4.45 In terms of the requirements of Condition 21, the applicant has provided a levels plan, however further detailed proposed levels at a scale of at least 1:100 are required and existing levels for the land adjoining the subject site is also required to ensure that the proposed development would relate appropriately to the surrounding area. Although it is noted that the existing levels adjoining the highway of Harrow View have been provided, the current levels plan submitted does not provide sufficient details of the existing levels for all of the adjoining

land or highway. In this regard, it is necessary to secure this further by condition.

- 6.4.46 In terms of Condition 22, the applicant has set out their open space strategy within their Landscape Design Report and the area of open space to be provided would be in accordance with the approved parameters. In this regard the details pursuant to this condition can be approved.

Refuse

- 6.4.47 Condition 16 requires:  
*Applications for approval of Reserved Matters for each relevant phase submitted pursuant to this permission relating to layout, access and landscaping shall be accompanied by a detailed Refuse Strategy for that phase. This document shall explain:*  
*(a) the storage and disposal arrangements for refuse and waste associated with private buildings, including vehicular access thereto;*  
*(b) the storage and disposal arrangements for refuse and waste associated with proposed public realm areas, including vehicular access thereto;*  
*(c) the hours of proposed waste collection; and*  
*(d) the proposed Waste Management Plan for public realm areas.*  
*The development shall be carried out in accordance with the details so agreed. A detailed Refuse Strategy is only required to be submitted and approved once per phase.*
- 6.4.48 London Plan Policy 5.13 requires development to minimise the generation of waste and maximise reuse or recycling. These sentiments are echoed in Core Strategy Policy CS1 X. Policy DM45 of the Development Management Policies Local Plan document requires proposals to make satisfactory provision for general waste, the separation of recyclable materials and the collection of organic material for composting. Detailed local design guidance is set out in the Council's *Code of Practice for the Storage and Collection of Refuse and Materials for Recycling in Domestic Properties* (2016).
- 6.4.49 The Code of Practice recommends a 'two bin' system for blocks of flats, comprising storage provision for general waste and recycling. Provision should be made for large blue bins for recycling (1280 litre) and large dark grey bins (1100 litre) for every eight flats.
- 6.4.50 The applicant sets out in their Urban Design Report that all communal refuse stores would be located at ground floor close to the residential entrances. Block F bins will include a managed strategy whereby refuse bins will be moved from the individual block stores to the larger holding store located in Block F1 on collection day. All houses and a majority of the ground floor apartments will have individual refuse stores located in front gardens. The ground floor apartments fronting Harrow View would have designated external stores located at the end of the courts and adjacent to the boundary wall along Harrow View. The applicant has provided a schedule of the number of bins that would be required to serve each block.



- 6.4.51 Access for the refuse trucks would be from Headstone Drive only and trucks will be able to access each court for collection. Refuse trucks will be able to turn adjacent to Block F1 to enable collection from Block F1 and F4 and exit back along the shared surface route to connect back to Headstone Drive.
- 6.4.52 The location and layout of the communal refuse stores and the private refuse stores to individual units are considered to be acceptable. However, with regards to the external refuse stores proposed for the apartments along Harrow View, it is not clear from the proposals how these refuse stores would appear in context of both Harrow View and the courts. Officers also have concerns over the location of refuse stores in prominent street frontage and the appearance of such within the development itself, given that 4 number stores are proposed at the end of each court.
- 6.4.53 Having reviewed the overall provision of bins for each Block, it is considered that there is sufficient capacity within the individual refuse stores within Blocks B2, C2, D2 and E2 to also serve those ground floor units fronting Harrow View in these blocks to avoid the need to provide outside refuse stores adjacent to the site boundary. Access to the designated refuse stores within each block would also be convenient in terms of distance for those residents.
- 6.4.54 Block F has an overprovision of bins, but the individual blocks (Blocks F2, F3 and F4) do not have sufficient bins in the stores to serve these blocks. It is noted that this block would have a total of 58 bins, however, based on the number of units within Block F, only 46 bins would be required to serve this block. Whilst the management company would bring the bins over on collection day to the larger store located in Block F1, which has the capacity to store 44 bins, it is not clear from the refuse strategy if the bins would be rotated on a frequent basis i.e. to move full bins into the larger holding stores and replace with empty bins to the individual stores. In order for the refuse strategy to work for this block some form of management would need to be in place to ensure rotation of bins so that adequate refuse provision of bins for each individual block is provided.
- 6.4.55 In terms of the ground floor units located in Blocks F3 and F4, each of these blocks have smaller refuse stores that can be easily accessed by these ground floor units, subject to there being a management strategy in place for this block, as noted above. On this basis, there would be no need to have external refuse stores within the court garden areas. In this regard, details of such can be addressed by condition as they relate to layout and landscaping aspects of the reserved matters. It is considered that the removal of the external refuse stores can be dealt with under the requirement of the landscaping condition.
- 6.4.56 In respect of criteria b), c) and d) of condition 16 no details have been provided with regards to the storage and disposal arrangements for refuse and waste associated with the proposed public realm, the hours of proposed waste collection and the proposed waste management plan for the public realm areas. Whilst it is noted that the accompanying landscape plans provide an indicative location for litter bins for the public realm areas, there is no information with regards to the management of waste collection. However, Condition 30 sub-

section b) requires details of a scheme for waste management in the public realm. As such, Officers consider that the limited information relating to the waste management of the public bins at this current stage would be adequately dealt with under condition 30.

### External Lighting

6.4.57 Condition 15 requires:

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

*(a) the lighting proposed for public realm areas and streets, including relevant justification;*

*(b) the proposed external building lighting.*

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

6.4.58 The applicant has submitted a lighting strategy in response to the above condition, which sets out the strategy to be adopted within each different zone of the development site.

6.4.59 Zone 2 in the strategy refers to secondary streets and shared surface routes and would incorporate strategically placed lighting columns at a height of 4 to 6 metres. It is intended to configure the luminaires and position lighting columns to minimise light pollution.

6.4.60 Zone 3, relates to pedestrian and cycle links and the lighting to these areas is aimed at providing sufficient lighting for navigation along the main footpaths and would incorporate lighting columns. The strategy sets out that care would be taken to not over light the green link in order to encourage biodiversity. Low level LED lighting is proposed to the furniture along the pedestrian route, to define such seating areas.

6.4.61 Zone 4, relates to urban squares and the public open spaces. The strategy for these areas will be to ensure safety and wellbeing and to create attractive night-time environment. It is proposed to use similar lighting columns to match those used for the pedestrian areas. It is also proposed to use ground mounted up lighting to illuminate specific features within the open space such as trees. Similar to the pedestrian route, furniture throughout the open space would feature some form of lighting.

6.4.62 Zone 5, relating to courtyard gardens would mainly consist of bollard lighting and low level lighting to ensure that ambient lighting is provided to illuminate the gardens without causing any obstruction to residents.

6.4.63 It is intended that all main entrances would be illuminated by soffit mounted down lighting. It is also proposed to install wall mounted lighting to all residential balconies.

- 6.4.64 The lighting strategy provides an outline for the proposed lighting scheme for plot D7 and the green link and in general would meet the required British Standards, the Institute of Lighting Professional guidance and other relevant guidance. The strategy sets out sufficient justification for the proposed lighting scheme.
- 6.4.65 Whilst Officers consider that the overall strategy can be supported in general, further lighting detail is required for the development site. A drawing is required to show light spillage and light levels together with further lighting details and a specification. A lighting condition would be required since there is insufficient detailed information about the lighting locations and lighting levels and how this relates to the landscaping details.
- 6.4.66 In this regard, it is considered necessary to attach a further lighting condition requiring the above to be submitted.

## 6.5 Residential Amenity

### *Residential Amenity of Future Occupiers*

#### **Policy Context**

- 6.5.1 There are no specific policies within the AAP which deal with safeguarding residential amenity but it states that development proposals would be required to meet policy DM1 of the Development Management Policies Local Plan (2013), which seeks to ensure that “proposals that would be detrimental to the privacy and amenity of neighbouring occupiers, or that would fail to achieve satisfactory privacy and amenity for future occupiers of the development, will be resisted”. Policies DM27 relating to amenity space and DM28 children and young people’s play facilities are also applicable.
- 6.5.2 Policy 3.5C of The London Plan requires all new residential development to provide, amongst other things, accommodation which is adequate to meet people’s needs. In this regard, minimum gross internal areas (GIA) are required for different types of accommodation, and new residential accommodation should have a layout that provides a functional space. Table 3.3 of The London Plan specifies minimum GIAs for residential units and advises that these minimum sizes should be exceeded where possible. The policy also provides a commitment that the Mayor will issue guidance on implementation of the policy, and this commitment is fulfilled by the publication of the Mayor’s Housing SPG (2016). The SPG sets out detailed guidance on a range of matters relating to residential quality, incorporating the Secured by Design principles, and these form the basis for the assessment below. The use of these residential unit GIA’s as minima is also reiterated in Appendix 1 of the Residential Design Guide SPD. This is supported by policy AAP13 of the AAP.
- 6.5.3 Draft London Plan policies D4 (Housing quality and standards) and D5 (Accessible Housing) are broadly reflective of the existing policies, but also seek to incorporate guidance contained within the Mayors Housing SPG into these policies to strengthen the requirements of achieving good quality of standards for new homes.

## ***Appraisal***

### *Defining good places*

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

### *Communal outdoor amenity space*

- 6.5.5 The proposal would make provision of podium level amenity space to serve Block F and semi-private communal gardens for Blocks B, C, D and E which would be enclosed by the proposed built form. In addition to this, residents will also have access to the green link which would provide additional communal outdoor amenity space.

- 6.5.6 Overall, it is considered that the different forms of communal space being offered would be a benefit of the scheme and improve the environment of these properties. The space would benefit from high levels of natural surveillance and would be of a configuration that would lend itself to domestic recreational activities.

### *Outdoor play space*

- 6.5.7 Local Plan Policy DM28 requires on site provision of facilities where a development would result in a net increase in child yield. Applying the child yields at Appendix 1 of Harrow's Planning Obligations SPD, it is calculated that the development would yield a total 213 children across all age ranges.

- 6.5.8 The Council's Planning Obligations SPD, informed by Harrow's PPG 17 Study, sets a quantitative standard of 4 square metres play space per child. When applied to the above child yield, this generates a requirement for 852sqm play space. The proposal would provide up to 2,458sqm place space across all age groups located along the green link and the semi-private communal gardens. Whilst it is noted that the supporting landscape strategy adopts the GLA's Play and Informal Recreation SPG (2012) benchmark to calculate the child yield and the resultant play space requirement, it is considered that the Council's Planning Obligation SPD, provides a better analysis of the local play space requirement and as such has applied this in assessing this application. Notwithstanding this, the overall play space provision exceeds what would be required for the size of the development proposed and as such the proposals are acceptable in this regard.

### *Entrances and approach/ active frontages*

- 6.5.9 The Mayor's Housing SPG calls for entrances to be visible from the public realm and clearly defined. The proposals show that the communal entrances to the

different blocks would be defined by recessed entrances with glazed doors which would be further articulated by the use of GRC panelling with the name of the building engraved into the panel. This would help to accentuate the entrance points into the buildings. The entrances to the individual apartments and houses would also consist of recessed storm porch entrances with the use of polyester coated cladding and entrance doors to accentuate the entrances to these units.

- 6.5.10 All entrances would be afforded natural surveillance from the communal open spaces and from the overlooking permitted from the development itself. The proposals in this regard are considered to be acceptable and the entrances would help define and activate the street frontages.

*Shared circulation*

- 6.5.11 The SPG sets out a number of guidelines for shared circulation space, which includes the numbers of units that are accessed from each core (eight units); the provision of entry phone, or audio-visual verification to the access control system where applicable; natural light and adequate ventilation where possible; in schemes with more than eight storeys the provision of two lifts; and in the case of those buildings with wheelchair units the provision of more than one lift.
- 6.5.12 Blocks B, B1 and B2 would be served by single cores with each core served by a single lift. However, given that there is a linked access to both, effectively residents of these blocks would have access to two lifts. These cores when assessed cumulatively would not serve more than eight dwellings per core. Furthermore, both cores would have natural lighting.
- 6.5.13 Blocks C, D and E would all have similar layouts in that the apartment blocks would each be served by a single core and one lift and the number of flats per core could not exceed eight. The lift core area would be naturally ventilated.
- 6.5.14 Blocks F1 would be the tallest block and would be served by two lifts and would comprise wheelchair units on the upper floors. The number of units per core would not exceed eight.
- 6.5.15 Blocks F2, F3 and F4 would all be served by a single core and one lift. The number of units per floor would not exceed eight.
- 6.5.16 In regard to shared circulation, the proposals are considered to broadly meet the guidance contained in the SPG.

*Dwelling space standards / internal heights/ flexibility*

- 6.5.17 The minimum space standards are set out at Table 3.3 of the London Plan and are reproduced within the SPG. This table is carried over in the draft London Plan policy D4.
- 6.5.18 The proposed 1bed, 2bed, 3bed and 4 bed units are all shown to exceed the minimum space standards. The individual rooms within the flats are of good layout and size and suitable internal circulation space is provided in all units. In

this respect the proposal is considered acceptable. The development would achieve a floor to ceiling height of 2.475 metres, which would be marginally below the 2.5metres as required by the Housing SPG. This reduction has been due to the incorporation of underfloor heating to each of the units. Officers consider that the shortfall would be marginal and unlikely to be perceptible or comprise the standard of accommodation being provided.

- 6.5.19 The SPG requires built in storage space to be provided in all new homes. The proposal is shown to provide an adequate level of storage space for each of the units.
- 6.5.20 The SPG also seeks adequate space and services to work from home. An indicative furniture layout is set out on the application drawings and this demonstrates that all of the flats would have space for a table. As such, each flat would have space flexible for dining and home study/work activities.
- 6.5.21 Policy 3.8(c) of the London Plan relating to Housing Choice, requires 90% of homes should meet building regulations M4 (2) – ‘accessible and adopted dwellings’. Policy 3.8(d) will require 10% of new housing to meeting building regulations M4 (3) – ‘wheelchair user dwellings’. The accessibility requirement of the scheme is considered in detail elsewhere in this appraisal.

*Private open space*

- 6.5.22 The SPG requires a minimum of 5sqm per 1-2 person dwelling and an extra 1sqm for each additional occupant. With the exception of two units located in Block F, every flat would have a private balcony space and gardens which would meet the required standard recommended in the SPG. Some of the larger 3 bed units are shown to have dual balconies to meet the required standards. The 3 bed (5 person) unit located on the first floor of Block F1, is shown to have a balcony of 7sqm, but would require a minimum of 8sqm. The 3 bed (5 person) unit located on the fifth floor of Block F4 is shown to have a balcony of 7.6sqm, a shortfall of 0.4sqm. Given that the development would offer an alternative semi-private external amenity space in form of the a podium garden and having regard to the generous internal space standard for both these units, it is considered that the shortfall in the standard by 1sqm and 0.4sqm respectively would not lead to any undue impact upon the residential amenities of the occupiers of these units to warrant a refusal.
- 6.5.23 The SPG also calls for a minimum depth and width of 1.5 metres for all balconies and other private open spaces. The proposed balconies and gardens would comply with these minimum dimensions.
- 6.5.24 In addition to private balconies, residents within would have access to private communal gardens, which is also consistent with the guidance contained in the Mayors SPG.

## *Privacy*

- 6.5.25 The SPG calls for habitable rooms within dwellings to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces. Paragraph 2.3.36 of the SPG refers to yardstick separation distances of 18-21 metres between facing habitable room windows.
- 6.5.26 As a high density scheme there would inevitably be some overlooking relationships between homes within the development. These occur in elevations fronting the podium level and communal gardens. These elevations would, of course, all contain habitable room windows and balconies, meaning that there would be a high level of visibility between homes on the same level (i.e. looking directly across) and perceptions of visibility to/from homes on other levels within the development. Given the high density nature of the proposal, which is consistent with the need to make effective use of this accessible previously-developed site, and the likely expectations of the future occupiers of such a development, this is not considered to be unacceptable. Future occupiers choosing to live at the development are likely to have different expectations about the level of privacy afforded from such a development than those choosing to live in more traditional, suburban environments.
- 6.5.27 Broadly Blocks B, C, D and E would generally meet the yardstick approach in the separation distances between facing habitable windows. However, Block F due to its layout comprising four separate blocks connected by a podium would result in much shorter distances between opposing elevations across the four blocks. In particular the distances between Block F2 and F3 would be 6.6m and similarly the distance between Blocks F4 and F1 would be around 6.5m. In most cases the windows in these opposing elevations would serve bedrooms and secondary windows to the main living rooms. Whilst the separation distances are short, however, as noted above for a high density scheme such as this, it is to be expected that there would be higher levels of mutual overlooking between apartments.
- 6.5.28 A number of the balconies and private gardens throughout the development would be sited adjacent to each other, or adjacent to neighbouring windows. This could be either resolved by erecting a privacy screen on the flank side of the balconies nearest the neighbouring windows or alternatively moving the balconies further so that there is some distance maintained between the balconies and neighbouring windows. Such details can be conditioned.
- 6.5.29 In terms of privacy between the different blocks within the development site, sufficient distant would be maintained to ensure that there is no unnecessary loss of privacy.
- 6.5.30 As noted under the layout section of the appraisal, the ground floor gardens and those units fronting the podium level would maintain sufficient defensible zones from the public realm to ensure the privacy of the occupiers of these units.
- 6.5.31 On balance, having regard to the high density nature of the proposal, which is consistent with the need to make effective use of this accessible edge of town

centre site and recognising that those choosing to live in a high density development are likely to have different expectations about privacy, it is considered that the relationships between residential buildings would secure a standard of privacy that would be commensurately high for the vast majority of future occupiers.

#### *Dual Aspect*

- 6.5.31 The SPG seeks to avoid single aspect dwellings where: the dwelling is north facing (defined as being within 45 degrees of north); the dwelling would be exposed to harmful levels of external noise; or the dwelling would contain three or more bedrooms. The definition of a dual aspect dwelling is one with openable windows on two external walls, which may be opposite (i.e. front & back) or around a corner (i.e. front and side) and the SPG calls for developments to maximise the provision of dual aspect dwellings.
- 6.5.32 The applicant has sought to exploit opportunities where possible to create dual aspect dwellings. However, it is noted that a large proportion of the units would be single aspect given the constraints of the site. Whilst the preference would be for dual aspect units, the proposed units would have east, south and west facing aspects and thereby each unit would receive adequate levels of natural daylight. All units that are north facing are shown to be dual aspect, with the other elevation facing east, south or west. It is considered that the single aspect nature of this development would be off-set by the good internal layout and circulation for each of the units.

#### *Noise*

- 6.5.33 The SPG seeks to limit the transmission of noise between flats, and from lifts/communal spaces to noise sensitive rooms, through careful attention to the layout of dwellings and the location of lifts. Local Plan Policy DM1 includes among its privacy and amenity considerations the adequacy of the internal layout in relation to the needs of future occupiers, and Harrow's Residential Design Guide SPD amplifies the point by advising that the vertical and horizontal arrangement of flats within a development should avoid conflicting room-use (i.e. bedroom vs. living/other room) relationships between flats.
- 6.5.34 Due to the Block configuration and the number of single aspect units, a number of flats would have bedrooms sited adjacent to living/ kitchen areas of adjoining flats. In the case of the cores to Blocks C, D, E and F a number of habitable rooms would be sited adjacent to the lift shaft. Although in the case of Blocks F2, F3 and F4 lift cores are sited adjacent to mainly the bathrooms and only in part of habitable rooms. Whilst this is not ideal, in most cases due to site constraints, this is unavoidable. However, having regard to the fact the development would be a new build and therefore would be required to ensure that sufficient noise insulation is provided to meet Building Regulations. When considered against the requirement for thermal installation also, it is considered that sufficient level of noise mitigation would be achieved to provide a good level of accommodation for future occupiers.



- 6.5.35 The applicant has submitted an Environmental Noise Survey and an External Building Fabric Assessment (as required by condition 17 attached to the outline permission) to determine whether any mitigation is necessary to achieve reasonable internal and external noise levels.
- 6.5.36 The noise survey was undertaken to measure the prevailing noise conditions at the site, in order to inform the external fabric analysis and set appropriate plant noise emission limits. The assessment included taking measurements at regular intervals over the course of 2 days in October 2017 at specific points along the site and the wider Kodak site. Results showed dominant noise sources across the site from vehicular movements on adjacent roads and train movement on the nearby railway when occurring. Noise levels were also noted from the movements within the industrial estate located along the eastern boundary of the wider Kodak site.
- 6.5.37 The noise survey sets out proposed maximum noise criteria for plant noise emissions affecting existing and proposed dwellings. These have been reviewed by the Council's Environmental Health Officer (EHO) who considers the set noise criteria to be acceptable. As this is at an early stage, plant selection has not been made. Therefore again compliance with these will need to be confirmed once the plant is chosen, which can be conditioned. In terms of vibration, confirmation that plant, flues etc. are installed with adequate anti-vibration measures would be required, which can be conditioned.
- 6.5.38 In terms of the external building fabric assessment, this report details the noise survey results and sets out the acoustic performance required for the external fabric of the building. The proposal would incorporate a 'whole house' mechanical ventilation system throughout. Internal noise levels to the flats can be effectively controlled by appropriate glazing to the different facades of each block. The report suggests the specification of glazing that should be used in the different frontages having due regard to the intended use of the internal space i.e. bedrooms and living areas. This would ensure that the development achieves satisfactory internal noise levels. The Council's EHO is satisfied with the mitigations proposed.
- 6.5.39 It is expected that the external areas proposed within the courtyards of each block would have noise levels in line with the  $55d_{La_{eq}}$  levels recommended. There are been no assessment undertaken with regards to the external noise criteria relating to the balconies and private gardens as the applicant considers that given the size of the balconies proposed, their locations in relation to nearby roads and the need to deliver high density housing development, it is not appropriate to apply the recommended noise criteria of  $55d_{La_{eq}}$ . Accordingly no further assessment has been undertaken in this regard. The Council's EHO has raised no objection in this regard. Notwithstanding this, balconies along Harrow View would have balustrading that would offer some noise screening from the traffic along Harrow View and balconies facing away from Harrow View are most likely to be subject to lower noise levels.

- 6.5.40 In terms of vibration, the applicant's Environment consultant has confirmed in writing that the development will not be affected by undue vibration due its siting away from the railway lines, and therefore no vibration mitigation is required.
- 6.5.41 In conclusion, the overview noise and vibration strategy is considered acceptable to meet the requirements of condition 17 of outline permission P/2165/17. However, further appropriate conditions are required to ensure that the development is constructed in accordance with the mitigations suggested in the report and that further details are provided with regard to the plant.

#### *Daylight and Sunlight*

- 6.5.42 The SPG (2016) states that *"All homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen and dining spaces should preferably receive direct sunlight"* (standard 32). Supporting paragraph 1.3.45 outlines that *"An appropriate degree of flexibility needs to be used when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties as well as within new developments themselves. Guidelines should be applied sensitively to higher development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and the scope for the character and form of an area to change over time."* Local Plan Policy DM1 includes among its amenity considerations the adequacy of light and outlook within buildings (habitable rooms and kitchens).
- 6.5.43 An assessment of potential impacts on sunlight, daylight and overshadowing has been undertaken and accompanies the application, pursuant to the requirements of Condition 12 attached to the outline permission.
- 6.5.44 The daylight and sunlight report is based on the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight: A Good Practice Guide'. The assessment considers the impact on the site's residential neighbours (discussed in detail elsewhere in this report) and on the quality of sunlight and daylight to the new residential dwellings. The methodology adopted is considered to be appropriate.
- 6.5.45 For the purposes of measuring the performance of habitable rooms within the proposed development, the assessment uses the Average Daylight Factor. This method measures how much sky can be seen from the window and converts the results into a percentage of annual probable sunlight hours received. The BRE guidelines recommend that ADF values of 1% should be achieved in bedrooms, 1.5% in living rooms and 2 % in kitchens. In the case of combined living rooms and kitchen a ADF of 1.5% has been used. The existence of balconies has also been captured within the analysis.
- 6.5.46 A total of 1339 rooms were assessed for ADF. From those assessed 1260 rooms tested will achieve their respective BRE ADF target value when the maximum parameter massing is applied. This would bring the overall

compliance rate for the development to 94.1%. In the case of those rooms that achieve a lower level of daylight, the amount of direct skylight is restricted by projecting balconies above.

- 6.5.47 The results of the analysis demonstrate that the majority of habitable rooms will achieve the recommended level of daylight. However, Officers also note that some rooms would only have ADF levels of less than 1% and as such there will be a number of apartments within the scheme which are inadequately lit and will receive poor daylight. It is highly likely therefore that some flats will require supplementary electric lighting particularly in the winter months. Despite this, it is also acknowledged the provision of balconies does provide a trade-off between providing easily accessible external amenity space and inevitable shading of windows below/ or recessed.
- 6.5.48 In terms of the sunlight assessment for the proposed courtyards gardens, the results show that marginally less than 50% of the area of each garden will be able to receive at least 2 hours of sunlight on March 21<sup>st</sup>. However, 42% of the area would still receive direct sunlight. Given the marginal shortfall below the recommended guidelines and having regard to maximising density on this previously developed land, the marginal shortfall would not have any adverse impact on the overall quality of the development. Further assessments were undertaken to demonstrate that during summer months that each of the courtyards would receive at least 2 hours of direct sunlight to at least 62% of the area in April and up to 90% of the area in June. Overall the assessment demonstrates that good levels of sunlight would be achieved for the courtyards.
- 6.5.49 In conclusion, Officers consider that whilst clearly it is desirable for a new development to achieve 100% compliance with the recommendations of the BRE guidelines, it is inevitable that a site of the proposed density will require consideration of some compromise between daylight/sunlight, the provision of highly valued residential amenity space (balconies) and other planning considerations that may influence the site layout and orientation of buildings.
- 6.5.50 It should also be emphasised here that the recommended BRE guidelines for daylight and sunlight – whilst a valuable tool for measuring the degree of daylight and sunlight that would be achieved – do not form a part of the adopted development plan. Rather, Local Plan Policy DM1 requires a high standard of amenity and undertakes to have regard to a range of amenity considerations which includes, but is not limited to, the adequacy of light and outlook. Thus, whilst a small proportion of the tested rooms/windows would not achieve the recommended BRE standards, across the development as a whole, it is demonstrated that the majority would. Furthermore, the majority of flats would benefit from a dual aspect, and all flats would meet or exceed the London Plan minimum space standards, and have access to private amenity space. On balance, therefore, it is considered that the poor performance of some parts of the development in terms of the recommended BRE guidelines is not unacceptable. Accordingly, the applicant has provided sufficient detail to approved part b) of Condition 12 attached to outline permission P/2165/17.

## Impact of Development on Neighbouring Occupiers

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

### *Daylight and Sunlight*

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

Goodstone Court, 205 Headstone Drive  
1 to 12 Beverley Court  
Clarendon Court, 256 Harrow View  
Bucknall House  
13-36 Altherton Place  
Moretons Court, 286 Harrow View  
292-306 (evens only) Harrow View  
1-27 Downing Close

- 6.5.53 In order to establish whether the proposals will have a significant effect on the daylight enjoyed by neighbouring properties, a Vertical Sky Component analysis (VSC) has been undertaken. BRE guidelines states that if the VSC at the centre of a window is less than 27% and it is less than 0.8 times its former value (i.e. proposed reduction is greater than 20%) then the reduction in skylight will be noticeable, and the existing building may be adversely affected.
- 6.5.54 With regard to daylight, the BRE Guidelines also set out numerical values for Daylight Distribution and seeks to ensure that a significant portion, which is considered to mean at least 0.8 times the existing area of each habitable room, lies in front of the No Sky Line (NSL).
- 6.5.55 In assessing the sunlight to existing buildings BRE guidelines recommends an assessment in the case of new development would be situated within 90° of due south of a main window wall of an existing building and the section drawn perpendicular to the existing window wall, the new development would subtend an angle greater than 25° to the horizontal measured from the centre of the lowest window. Sunlighting to an existing window can be considered to be adversely affected if it receives less than 25% of annual probable sunlight hours (APSH), or less than 5% of annual probable sunlight hours between 21 September and 21 March, receives less than 0.8 times its former sunlight hours

during either period and has a reduction in sunlight received over the whole year greater than 4% of the ASPH.

- 6.5.56 A majority of the proposed blocks subtend an angle of less than 25 degrees from the lowest windows serving the properties opposite the site on Harrow View and therefore no further impact assessment is required to such properties in terms of VSC, NSL and ADF. However Block F would subtend an angle of 28 degrees from the closest ground floor windows serving 1-27 Downing Close and therefore a detailed assessment would be required. The report also considers the impact on Goodstone Court to the south of the site.
- 6.5.57 In terms of the impact on Goodstone Court, majority of the windows will retain excellent daylight amenity after development. The assessment undertaken shows that only 4 windows do not achieve the BRE guidance. Each window retains a VSC of at least 0.78 times its existing value, which is only marginally below the 0.8 times suggested in guidance. Each window achieved the required NSL criteria and would continue to achieve an ADF value in excess of the BRE ADF target value. In terms of sunlight the neighbouring property is located to the south of the subject site and therefore there will be no impact in terms of sunlight to this neighbouring site.
- 6.5.58 In terms of 1-27 Downing Close, these properties are located opposite to Block F. Majority of the windows would achieve the target BRE VSC criteria with some windows actually experiencing a gain in daylight due to the demolition of the large existing factory building located on the site. Only 2 windows experience reduction of 0.77 times its existing value, which is marginally less than the 0.80 criteria recommended by the guidelines. However the report does set out that the VSC to these windows is already impacted by the overhanging balconies to this building itself. In terms of the NSL there are five rooms that experience reductions that are marginally in excess of the guidelines. Overall there would be no material reduction in daylight and the neighbouring building opposite will continue to receive very good daylight amenity after development.
- 6.5.59 In terms of sunlight assessment, as none of the windows are orientated within 90 degrees south of the development there will be no impact in terms of sunlight.
- 6.5.60 In assessing the impact in terms of outlook and privacy, there would be some level of overlooking of the communal garden and facing windows serving Goodstone Court from proposed Block B. However, a distance of at least 30 metres would be retained between opposing elevations, which would be a good level of separation distance. Furthermore, the internal courtyard to Goodstone Court is overlooked by the inhabitants of that building itself and therefore the overlooking from Block B would be no worse in terms of privacy.
- 6.5.61 Sufficient distance would be retained between the site and the existing development located opposite and the forthcoming development in development zone A of the masterplan. In this regard there would be no impact in terms of privacy or outlook.

6.5.62 In conclusion, the proposed development whilst would introduce a high density form of development within close proximity to existing building, it has been demonstrated that the proposal would not give rise to an unacceptable level of harm to any residential amenities of neighbouring site so as to warrant a refusal on such grounds. It is considered that the proposal would give rise to no conflict with the development plan policies stated above. Accordingly, part a) of Condition 12 can be approved.

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

### ***Policy Context***

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

6.6.2 The London Plan Policies 6.3, 6.9 and 6.13 seek to regulate parking in order to minimise additional car travel, reduce trip lengths and encourage use of other, more sustainable means of travel. The Parking Addendum to Chapter 6 of The London Plan sets out maximum parking standards for new development dependent upon their use and level of public transport accessibility. It is noted that at supporting paragraph 6A.3A to the Parking Addendum sets out that there is scope for greater flexibility to the parking standards in different parts of London having regard to patterns of car ownership and use, levels of public transport accessibility, the need for integrated approaches to on-site and off-street parking, efficiency in land use and overall impact upon environment and the transport network. Draft London Plan policies T5 (Cycling) and T6.1 (Residential parking) broadly carry over the principles of the current policies. There are some minor changes proposed in the draft London Plan with regard to the amount of cycle parking to be provided for 1 bed units. Current policy requires 1 cycle space parking, the draft policy seeks 1.5 cycle parking spaces. The threshold for maximum parking spaces is proposed to be reduced. Current standards do permit up to 2 spaces for larger units in low PTAL areas. The draft London Plan sets the maximum at 1.5 spaces per unit in a very low PTAL area (Zones 0 -1). Other changes also include the requirement of 20 percent spaces having active charging points with the remaining 80 percent of the spaces being passive.

6.6.3 Policy AAP 19 of the AAP seeks to limit on site car parking and development proposals to support the use of sustainable modes of transport, in particular in areas that have a high level of public transport accessibility. Policy AAP 20 (Harrow and Wealdstone Green Travel Plan) seeks to ensure that all major developments produce a site specific travel plan to demonstrate how the development would meet the wide Green Travel Plan provisions.

Condition 20 requires:

6.6.4 *Applications for approval of Reserved Matters for each relevant phase submitted pursuant to this permission relating to layout and access shall be*

accompanied by a detailed Transport Strategy for that phase. This document shall explain:

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

6.6.5 The applicant is provided a transport strategy (TS) in response to the above condition. This has been reviewed the Council's Highways Engineer (HE). The transport consultant has produced a Technical Note (dated January 2018), in response to the comments submitted by TfL. This has been incorporated into the appraisal below.

*Criterion (a)*

6.6.6 With regard to requirement (a), the applicant has provided a breakdown of the parking spaces to be provided across the site. This is broken down as follows:

154 standard spaces for residents  
17 wheelchair standard resident spaces  
12 visitor parking spaces  
1 wheelchair standard visitor space  
1 car club space

6.6.7 Residents would be able to purchase a permit to park in allocated bays and the allocation and management (including enforcement of parking controls) of parking bays would be done by the estate management team. The applicant has revised the transport strategy to remove the restriction imposed on visitor bays of no return within 24 hours, following advice from the Council's Highway Engineer.

6.6.8 Whilst the Council's Highway Engineer has no objection in principle to the parking management aspect of the proposal and the level of parking being proposed at a ratio of 0.4, they have stated that the Additional information that TfL have mentioned should be added to the Parking Management Strategy in order to fulfil the requirements of the condition. If there is an excess in

demand for parking spaces, the appropriate steps would not be to direct residents to the Travel Plan itself, there will be a travel plan co-ordinator who would be able to give advice and information to every resident on occupation in the form of a 'Welcome Pack' (travel information) which is a fairly standard measure used in residential travel planning. The Council would expect that information on parking arrangements would be made clear to potential residents during the process of selling or letting properties.

6.6.9 Unfortunately this proposal does provide an insufficient allocation of disabled parking spaces. It is not appropriate to be selective about the use of the draft London Plan standards, therefore going forward, it is expected that the 2016 London Plan standards are to be met as a minimum and if applicants wish to introduce measures/facilities that exceed requirements of the 2016 London Plan in line with the draft London Plan or otherwise, these will be welcomed. Whilst the site constraints are accepted, it is important that a consistent approach across the entire site is adopted, therefore, the required level of disabled parking bays is 10% of the number of residential units. Plans should be amended accordingly in order to meet the requirements of the condition. Officers are seeking further clarification from the Highway Engineer with regard to the 10% disabled parking requirement, as it is not clearly stated with both the regional or local plan policies that indeed a minimum of 10% of disabled parking spaces must be provided. The outcome of this will be reported via the addendum

*Criterion (b)*

6.6.10 In terms of the cycle parking provision, the minimum long stay cycle parking required in plot D7 is 785 spaces. The proposal would exceed this minimum and provide 868 spaces which is welcomed. The proposed level of cycle parking is accepted.

6.6.11 Some of the proposed cycle parking racks should be substituted for Sheffield stands in order to meet the required minimum 5% accessible cycle parking spaces. Residents should not be expected to use the short stay cycle parking in the public realm areas as an alternative. The comments TfL have made in relation to cycle parking are intended to ensure that the development provides the best facilities it can. If people are to be persuaded to change their preferred mode of travel, the facilities need to be easy to use and secure as a basic minimum. Stacking racks are okay for experienced cyclists who have the ability to use them, however, disabled people or people with other health issues, inexperienced cyclists, children/young/old people and those using non-standard bikes may all find stacking racks a deterrent. Whilst it may have been considered a better security arrangement to only have one door for the cycle stores, it is worth considering that residents might actually find it more convenient, thus more attractive to be able to enter the store directly from the residential block.

6.6.12 TfL have requested that once the above considerations have been taken on board, a summary table of the provision within each cycle store and comparison against the requirement will be required to make a full assessment. The Council's Highway Engineer has concurred with this and stated that further



consideration is required, particularly to ensure that the required numbers of accessible spaces are provided throughout the stores, the table requested should not be too difficult to supply. The 19% of spaces that are not two tier racks does not equate to accessible long term cycle parking if it takes the form of wall mounting facilities. The highways authority has requested details of the types of storage should be supplied going forward.

*Criterion (c)*

- 6.6.13 Electric Vehicle charging point – The applicants transport strategy states that 20% of the parking bays will include electric vehicle charging and will be allocated to residents with an electric car on a first-served basis. The applicant will offer the provision of active electric charging for an additional 20% of residential parking bays. The proposed numbers are considered to be acceptable.

*Criterion (d)*

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

*Criterion (e)*

- 6.6.15 The Council's highway authority have stated that with regard to motorcycle parking one more space is required to satisfy DM42 of the Harrow Development Management Policy, which requires the provision of 1 motorcycle space per 20 car parking spaces. A minimum of 9 spaces should be spread more evenly across the zone to provide a suitable facility for any potential motorcycle users. The applicant has amended the parking plan to show where the spaces would be allocated across the site. In this regard the proposal is acceptable.

*Criterion (f)*

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

*Criterion (g)*

- 6.6.17 In terms of the pedestrian and vehicle signage/wayfinding, the proposed signage is welcomed. There is a contribution for Legible London signs which may serve the purposes mentioned in the strategy eg. at either end of the Green Link.

*Criterion (h)*

- 6.6.18 Enforcement procedures on unadopted roads would be carried out by the management company which is considered to acceptable. Residents who wish to have an allocated parking space will be able to buy a permit for that space. The highways authority has no objection in this regard.

*Criterion (i)*

- 6.6.19 Is not application for this phase.

*Criterion (j)*

- 6.6.20 The transport strategy sets out a summary of how approach relates to original Transport assessment and the highways authority is satisfied with this.
- 6.6.21 With regards to subsections a) and b) of Condition 16, the highways authority has confirmed that they are satisfied with the refuse vehicle access arrangements.
- 6.6.22 Having regard to the above assessment, Officers will discuss with the highways authority a suitable condition for the outstanding matters and report this via the addendum.

6.7 Development and Flood Risk

- 6.7.1 London Plan Policy 5.12 *Flood Risk Management* states that development proposals must have regard to measures proposed in Catchment Flood Management Plans. It is noted that the EA's Thames Catchment Flood Management Plan (2009) focuses on the adaptation of the urban environment to increase resistance and resilience to flood water, and that this objective informed the preparation of Harrow's Local Plan policies on flood risk management.
- 6.7.2 Core Strategy Policy CS1 U undertakes to manage development to achieve an overall reduction in flood risk and increased resilience to flood events. Policy AAP9 of the AAP calls for major development to: reduce surface water run-off; utilise sustainable drainage systems; ensure adequate arrangements for management and maintenance of on-site infrastructure; use appropriate measures to prevent water pollution; and where appropriate, demonstrate that the proposal would be resistant and resilient to flooding from all sources.
- 6.7.3 London Plan Policy 5.13 states that development should utilise sustainable urban drainage systems (SUDS) and should aim to achieve greenfield run-off rates and this objective is reiterated in Policy AAP9. Policy 5.13 of the London Plan sets out a drainage hierarchy to manage surface water run-off as close to its source as possible.

Condition 13 requires:

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

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

- 6.7.5 The applicant has submitted a drainage strategy in respect of the above condition.
- 6.7.6 The strategy sets out that for surface water, the drainage catchment would drain to the Thames water surface water sewer on Headstone Drive and Harrow View at a restricted rate. In order to achieve the required discharge rate of 5 l/s/ha, storage will be proposed in form of swales, permeable paving and below ground attenuation tanks and would be designed to allow 40% climate change. In terms of foul water drainage, the applicant proposes to connect to the existing Thames Water foul sewers.
- 6.7.7 The proposals have been reviewed by the Council's Drainage Engineer and the applicant has provided a response to the points raised. However, Thames Water have stated that the details pursuant to the above condition cannot be approved until a hydraulic impact study to determine possible connection points on the existing system, or what upgrades to the existing network is required in order to support the demand anticipated from this development. The Council's Drainage Engineer has stated that whilst the intent of the drainage strategy could be supported, the design and layout would change once the hydraulic impact assessment has been undertaken and appropriate strategy has been agreed with Thames Water. The Drainage Authority would need to be satisfied that the drainage design can be delivered on site to serve the future development and as currently proposed, it considers that the drainage strategy proposed cannot be approved based on concerns raised about existing capacity. On this basis, it is considered that further drainage conditions would need to be imposed to ensure that an appropriate capacity assessment is undertaken prior to designing the drainage system for approval.

## 6.8 Trees and Ecology

### 6.8.1 Condition 9 requires:

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

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

### 6.8.2 The applicant has submitted a biodiversity protection and enhancement strategy in respect of the above condition. In summary, with respect to part a) of the above condition the proposed biodiversity enhancements will include the provision of bird boxes, bat boxes, invertebrate boxes, log piles, hedgehog passes and pollinator targeted planting.

- 6.8.3 The proposed strategy has been reviewed by the Council's Biodiversity Officer, who has commented that the bat boxes, of which at least half should be built into the fabric of the new buildings, offering appropriate roosting and breeding opportunities. Under BAP Action 3d, not only should developments '*incorporate nesting and/or roosting sites for relevant species of birds and/or bats*' but **preference should always be given to 'built-in' features such as roosting bricks, bat tubes and bat bricks**. Accordingly at least half of the bat roosting/breeding opportunities for each building should be built-in offering equivalent scope/capacity for roosting and/or breeding. From the strategy it is not clear if it proposed to mount 4 bat boxes on each building or a total of 4 only. Whilst the 1FQ time boxes can be mounted on buildings as noted above 'in-built' features should be incorporated. The 2F type bat boxes to be attached to trees are considered acceptable.
- 6.8.4 Similar to bats, there is a presumption that nest boxes should be built in wherever possible. There should again be 12 swift boxes and a mix of 25+ tit, robin, sparrow and starling boxes. The peregrine box is to be welcomed.
- 6.8.5 Invertebrate shelter boxes may have some benefits for certain species and are to be encouraged on that basis. Creation of 'sand banks' or sandy spaces (with sand mixed with a very low proportion of cement), in suitably sunny locations, would suit other species for invertebrates and the appropriate management of vegetation and arising (shrubby debris, cut timber and deadwood etc., and green composting on site) would have added benefits and should be incorporated within a detailed management plan.
- 6.8.6 In terms of part b) of the proposed condition, the strategy sets out a number of initiatives for habitat creation on the site. Green roofs are proposed, which are considered acceptable. The Biodiversity Officer considers that the seed mixes are fine. However, preference would be for a reduced amount of grasses (and/or yellow rattle seed) than in ER1F, and inclusion of cornfield flower mix seed (SC2) within what is proposed. The plans should help to enhance the site but should go further than they do at present.
- 6.8.7 The climbing plants proposals are to be welcomed in principle. However, further information should be provided about the proposed 'trellis system'. What form will this take? What will be its extent? What biomass of climbers will be supported? The information is somewhat unclear referring in parts to climbers on bare walls – and then around trees. More definite details about what is proposed are required.
- 6.8.8 With regard to the proposed swales, between 5 and 15% of meadow areas should be left uncut from 1 to 2 years in order to enable invertebrates that overwinter as larvae, eggs or pre-adult forms in biennial plants to complete their life cycle.
- 6.8.9 A ponds shape and the mix of contours above and below the waterline can add greatly to the value of what is in the pond and around its margins. Given the lack of other permanent water bodies, this is a prime opportunity to add biodiversity value to the site. A typical cross section through 'a pond' is provided

but the pond will need to be planned in detail, taking account also of the water it will receive and the effects of evapo-transpiration. From drawing L-101, the indication is that the pond is to be largely surrounded by trees, including from the south and that much its potential area will be under an area of decking. If this is what is planned it needs to be reconsidered and detailed proposals submitted for approval.

- 6.8.10 In reference to part c) of the above condition, the Council's Biodiversity Officer has advised that if bat and bird boxes and other aspects of the site are to be monitored, the resulting records should be shared with the local environmental records centre, Greenspace Information for Greater London, as well as with the iRecord network via the Consultants Portal. This should be conditioned as a requirement for its own sake but will also provide a means for LBH to evaluate compliance.
- 6.8.11 In view the above recommendations, whilst the overall biodiversity protection and enhancement strategy provides an overview of the proposed biodiversity strategy for this site, it is considered necessary to condition the detailed enhancements in line with the recommendations above.
- 6.8.12 Condition 18 requires  
*Applications for approval of Reserved Matters for each relevant phase submitted pursuant to this permission shall be accompanied by a detailed Arboricultural Report for that phase. This document shall explain how the trees outlined in purple on the Application Plan HV(00)AP003 (20.03.2012) are to be retained, together with measures for their protection during the course of the development. If any trees outlined in purple on the Application Plan HV(00)AP003 (20.03.2012) are to be removed, lopped or topped, a full justification must be provided within the Arboricultural Report. This document shall also explain the total numbers of trees to be removed, together with details of proposed replacement tree planting, to ensure an overall increase in the number of trees across the site.*
- 6.8.13 The applicant has provided an up-dated Arboricultural Survey and Arboricultural Method Statement in support of the above condition. The method statement sets out that 26 individual trees and five groups of trees are proposed to be removed within plot D7. The clearance of several areas of self-set trees will also be required. Some of the trees are protected by a Tree Preservation Order - TPO No.874. Council's records show that the trees located along the entrance point into the site from Headstone Drive are covered by a separate TPO No.876. Most of the trees to be removed are assessed as being of low, Category C retention value (8 out of the 26 trees are Category B). To mitigate the loss of these trees, up to 456 new trees are proposed to be planted throughout the wider site.
- 6.8.14 In addition to the removal of the trees, some access facilitation pruning would be required to a total of three trees (Nos.40, 41 and 66) to an adequate height to provide clearance for construction of the new buildings and hardstanding along the western site boundary. In addition for the same trees and including

tree No.34 would need to be pruned back by approx. 2m west to minimise potential harm to these trees from works.

- 6.8.15 The method statement, does amongst other specific site measures set out that works associated with the new installation of surface and foul water sewers, associated manholes and inspection chambers to the western edge of the proposed buildings will require works within the initial and modified Root Protection Areas (RPA) of the trees along the western boundary of the site and as such the statement sets out a precautionary approach to the works.
- 6.8.16 The reduction in the height of the boundary wall would need to be done from the Harrow View footpath and works would need to be done manually by hand held tools.
- 6.8.17 There is no mention in the method statement of the proposed construction works associated with the proposed new stepped and ramped access points along the Harrow View boundary. However, having looked at the protection plan it appears that the location of these break-out points would be outside the RPA exclusion zone. Notwithstanding this, a further method strategy is needed to fully set out the detailed strategy for the proposed reduction in height of the wall from the Harrow View pavement and how access along the footpath would be managed given the narrow footpath. Details are equally required for the proposed new break out points along this boundary to satisfactory demonstrate that there would be appropriate measures in place for pedestrian/ highway safety and the retained trees during construction works associated with the amendments to the boundary and landscaping at the new access points which has not been addressed in the current method statement. Officers consider that this can be conditioned as such works relate to matters relating to landscaping and access.
- 6.8.18 During pre-application discussion in relation to this site, Officers accepted the removal of the trees in principle as it was considered that in order to create an active frontage and to interface the development within the wider landscape the removal of the trees would be justified in this case. Furthermore, the loss of these trees would be offset by the enhanced landscaped proposal for the site which would include extensive tree planting to not just the open spaces, but along key public realm routes along Harrow View.

## 6.9 Accessibility

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

- 6.9.2 Condition 14 requires:  
*Applications for approval of Reserved Matters for each relevant phase submitted pursuant to this permission relating to layout, access and landscaping shall be accompanied by a detailed Accessibility Strategy for that phase. This document shall explain:*  
*(a) how the proposed public realm areas would be accessible to all, including details of finished site levels, surface gradients and lighting;*  
*(b) how each non-residential building would be accessible to all, including details of level access and internal accommodation arrangements;*  
*(c) that each of the residential dwellings would comply with Lifetime Homes standards, with 10% Wheelchair Homes compliance.*
- 6.9.3 As discussed elsewhere in this appraisal, the site levels plans submitted with this application only provide an overview of the proposed site levels. Insufficient details have been provided with respect to actual surface gradients to a suitable scale. Furthermore detailed cross-section details would be required. In terms of lighting further information is also required.
- 6.9.4 In respect of part b) above, this is not relevant for this development plot as it fully comprises of residential led development.
- 6.9.5 With respect to part c), the applicant's UDR confirms under the inclusive access section that at a minimum all homes would meet Part M4(2) of the Building Regulations and at least 10% of the homes would be wheelchair adaptable to meet the requirements of Part M4(3). In this regard part c) of the above condition has been met.
- 6.9.6 As part a) have not been met, it is necessary to attach this condition again.
- 6.10 Sustainability
- 6.10.1 London Plan Policy 5.2 (Minimising Carbon Dioxide Emissions) requires new development to minimise carbon emissions in accordance with the energy hierarchy of be lean (use less energy), be clean (supply energy efficiently) and be green (use renewable energy). The policy sets targets for carbon emission reductions, with a 40% reduction required relative to the 2010 Building Regulations for both residential and non-residential development (this is equivalent to a 35% reduction over the more recent 2013 Building Regulations). The policy outlines the requirements for energy statements and indicates that the carbon reduction targets should be met on-site.
- 6.10.2 Policy 5.5 (Decentralised Energy Networks) requires developers to prioritise connection to existing or planned decentralised energy networks where feasible, with Policy 5.6 (Decentralised Energy in Development Proposals) requiring the evaluation of the feasibility of Combined Heat and Power (CHP) systems in new developments and where such a system is appropriate, the examination of opportunities to extend the system beyond the boundary to adjacent sites. The policy also requires development to prioritise connection to existing heating and cooling networks, followed by a site wide CHP network, and lastly communal heating and cooling.

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



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

- 6.10.6 The submitted energy statement states that the overall measures that are to be implemented would achieve a 41.78% improvement over Part L 2013, which would exceed London Plan policy stated above. The energy statement has explored various renewal technologies available, however, considers that such technologies would not suit the development proposed and could be counterproductive to the savings made by the installation of the proposed Combined Heat and Power boilers (CHP). The report highlights that reduction in carbon emission through building fabric is more cost effective than renewables. The application is accompanied by an External Fabric Assessment, which informs the energy statement.
- 6.10.7 Officers acknowledge that there is no mandatory requirement for renewables. Building fabric and low carbon solutions should always be prioritised before renewables.
- 6.10.8 In terms of part c) of condition 8, the energy statement sets out how the buildings would connect to the proposed energy centre located on Plot D8, which is located in the wider masterplan and is subject to further consideration under application P/5244/17. The energy statement sets out how such an energy centre would be designed to permit connections in any future District Heating Network.
- 6.10.9 Part d) is not relevant in this case.
- 6.10.10 Based on the above, Officers consider that the energy statement submitted in respect of the above condition can be approved.
- 6.11 Housing Mix
- 6.11.1 London Plan policy 3.8 and policy AAP13 of the AAP require new development to provide a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups.
- 6.11.2 Condition 11 requires:  
*Applications for approval of Reserved Matters for each relevant phase submitted pursuant to this permission relating to layout, scale and appearance (excluding where housing is not proposed) shall be accompanied by a detailed Housing Schedule for that phase. This document shall explain:*  
*(a) the type and mix of units proposed;*  
*(b) whether the units are to be provided as affordable or not and if so what tenure;*  
*(c) the gross internal floor areas of each dwelling; and*  
*(d) the number, mix and tenure of all residential units known at the time of submission of the reserved matter.*
- 6.11.3 The applicant has provided a schedule of the type, mix, tenure and floor areas of units to be proposed across the site, which includes, 1 bed(2 person), 2

bed(3 and 4 person), 3 bed(4 and 5 person) and 4bed (6 person) units. The applicant has set out that of the 460 units 186 (40%) units would be affordable housing which would include a mix of flats and houses. Of these, 111 will be for affordable rent and 76 for shared ownership, providing a tenure split of 60% affordable rent and 40% shared ownership. The applicant has provided the GIA for each unit type which has been considered to be acceptable in terms of the national space standards. The homes for affordable rent would be provided within Blocks B1, E1 and E2, whilst the shared ownership homes will be located within Blocks B2, F3 and F4.

- 6.11.4 The scheme would deliver 4 studio apartments (within private tenure only) 131 one bedroom units, 257 two bedroom units and 62 three bedroom units and 6 four bedroom units.
- 6.11.5 The proposed unit mix is considered to be acceptable and in accordance with the above stated policy. The level of affordable housing provided on this phase would exceed the minimum of 20% (across the entire Phase D site) fixed at outline stage and does not warrant any further financial viability review, given that the scheme delivers a policy complaint scheme. In this regard, details pursuant to the above condition can be approved.

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

- 7.1 The proposals would not give rise to any unreasonable impact upon the amenities of any neighbouring occupiers and will provide satisfactory living accommodation for potential occupiers. It is considered that the external appearance, scale, layout, access and landscaping scheme submitted is acceptable and it is recommended that the application is approved.
- 7.2 The decision to grant planning permission has been taken having regard to the National Planning Policy Framework (2012), the policies of The London Plan (2016), Harrow's Core Strategy (2012), the policies of the Harrow and Wealdstone Area Action Plan (2013) and the policies of the Harrow Development Management Policies Local Plan (2013) listed in the informatives below, as well as to all relevant material considerations including the responses to consultation. The proposals have also been considered against the draft policies contained within the Draft London Plan, published in November 2017.

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

### **Conditions**

#### **General**

- 1 Unless otherwise agreed in writing by the local planning authority, the development shall be carried out in accordance with the approved drawings and documents.

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

#### **Pre-Commencement Conditions**

- 2 Notwithstanding the submitted Drainage Strategy, no development shall take place, other than works of demolition, until a drainage strategy detailing any on and/or off site drainage works, has been submitted to, and agreed in writing by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed.

REASON: The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community. This condition is a PRE-COMMENCEMENT condition.

- 3 Notwithstanding the submitted Drainage Strategy, no development shall take place, other than works of demolition, until details of works for the disposal of surface water, including surface water attenuation and storage (which include details of storage calculations accounting for climate change; outlet and cross-section of proposed storage; details of flow restrictions; and management plan for disposal of ground water during construction phase), have been submitted to, and agreed in writing by, the local planning authority. The submitted details shall include measures to prevent water pollution and details of SuDS and their management and maintenance. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development achieves an appropriate greenfield run-off rate in this critical drainage area and to ensure that sustainable urban drainage measures are exploited. To ensure that measures are agreed and built-in to the development to manage and reduce surface water run-off, this condition is a PRE-COMMENCEMENT condition.

- 4 Notwithstanding the details submitted on drawing number LN005112-L103, no development shall commence, other than works of demolition, in relation to each sub-phase (as so agreed pursuant to condition 6 (Phasing Strategy) of outline permission granted under ref: P/2165/15) until details of the levels of the proposed building(s), road(s) and footpath(s) in relation to the adjoining land and highway(s), and any other changes proposed in the level of the site, 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: The submitted levels plans does not provide sufficient details in respect to all land adjoining the site and detailed proposed levels are required for all ground surfacing including entrances to buildings, ramped pedestrian access, gradients and 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.

### **Progression-Point Conditions**

- 5 Notwithstanding the details shown on the approved drawings, the development shall not progress beyond damp proof course level in relation to each sub-phase (as so agreed pursuant to condition 6 (Phasing Strategy) of outline permission granted under ref: P/2165/15) until samples of the materials (or appropriate specification) to be used in the construction of the external surfaces noted below have been submitted to, and agreed in writing by, the local planning authority:
- a) facing materials for the buildings, including brick mortar, glassed reinforced concrete (GRC) and metal cladding;
  - b) windows and doors;
  - c) balconies including privacy screens and soffits;
  - d) boundary treatment including all pedestrian/ access gates (including gates to parking courts);
  - e) ground surfacing;
  - f) rainwater goods;

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 is carried out to the highest standards of architecture and materials.

- 6 The development hereby approved shall not progress beyond damp proof course level until one x 1:1 sample mock-up of the block type referred to as B, C, D and E x 1:1 sample mock of block type F, to include the balcony, window opening and two brick piers to be used in the external faces of the buildings have been erected on site (or at such other location(s) as may be agreed in writing by the local planning authority) and agreed in writing by, the local planning authority. The development shall be carried out in accordance with the details, samples and drawings so agreed and shall be retained as such thereafter.

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

- 7 The development hereby approved in relation to criterion a) and b) shall not progress above damp proof course level in relation to each sub-phase (as so agreed pursuant to condition 6 (Phasing Strategy) of outline permission granted under ref: P/2165/15) until details noted below have been submitted to and approved in writing by the local planning authority:
- a) full details (including specification) of any extraction flues, plant/ ventilation systems, rainwater disposal systems (including downpipes) and any rollershutters, gates and other means of controlling access to the car park;
  - b) details to demonstrate that all plant/ ventilation systems would meet the plant noise criteria set out in the submitted Environmental Noise Survey and would be fitted with adequate anti-vibration measures; and
  - c) a follow up acoustic survey to demonstrate installed plant compliance shall be submitted after completion of the works above.

The application shall be implemented in full accordance with such details and be maintained thereafter.

REASON: To ensure that adequate precautions are taken to avoid noise nuisance and to safeguard the amenity of residents.

- 8 The development hereby approved shall not progress above damp proof course level in relation to each sub-phase (as so agreed pursuant to condition 6 (Phasing Strategy) of outline permission granted under ref: P/2165/15) until details to show that appropriate noise mitigation measures in line with the strategy set out in the submitted External Building Fabric Assessment have been incorporated within the design of each building (including appropriate glazing and Mechanical Ventilation and Heat Recovery System) has been submitted to, and agreed in writing by, the local planning authority. The details shall include independent acoustic testing where applicable. 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 amenity for future occupiers of the site and provides adequate noise mitigation.

- 9 The development hereby approved shall not progress above first floor level until details of privacy screens to be installed to the balconies and gardens and their locations across the development or where feasible repositioning of balconies to avoid direct overlooking have first been submitted to, and agreed in writing by, the local planning authority. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

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

- 10 Notwithstanding the submitted lighting strategy, the development hereby approved shall not progress above damp proof course level in relation to each sub-phase (as so agreed pursuant to condition 6 (Phasing Strategy) of outline permission granted under ref: P/2165/15) until details (including locations, specification and elevations) of the lighting of all public realm and other external areas (including

buildings, and podiums/ balconies) within the site has been submitted to, and agreed in writing by, the local planning authority. The details shall include light spillage and lighting levels. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: The submitted lighting strategy provides insufficient details and further details are required to ensure that the development incorporates lighting that contributes to Secured by Design principles, achieves a high standard of residential quality.

11 Notwithstanding the submitted Landscape Strategy and accompanying drawings, the development hereby approved shall not progress above damp proof course level in relation to each sub-phase (as so agreed pursuant to condition 6 (Phasing Strategy) of outline permission granted under ref: P/2165/15) until the following details have been submitted to, and agreed in writing by, the local planning authority:

a) A scheme for detailed hard and soft landscaping of the development, to include details of the planting, hard surfacing materials, raised planters and external seating,. Soft landscaping works shall include: planting plans (at a scale not less than 1:100), written specification of planting and cultivation works to be undertaken and schedules of plants, noting species, plant sizes and proposed numbers / densities and an implementation programme. The hard surfacing details shall include samples to show the texture and colour of the materials to be used and information about their sourcing/manufacturer. The hard and soft landscaping details shall demonstrate how they would contribute to privacy between the approved private terraces and the public pedestrian route, and communal garden/open space areas.

b) Details of all furniture, boundary treatment (both public, private and works associated with existing boundary along Harrow View), public realm wayfinding signs, play equipment, irrigation if proposed, specification for the proposed pergola (including proposed material and source) and detailed drawings of such; details of the vent grilles to all communal areas including any vent screening.

c) Full scale metric cross section plans for all open spaces (including the area between the western side of the blocks and the boundary with Harrow View), including private communal open space. Full elevations and cross-sections for the podium level (where proposed) including the proposed details for the external walls (including ventilation) for the podium deck and should include tree planting/ fixing details for the podium levels.

d) 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.

e) Details required under section a) above shall also include the removal of the proposed external bins stores located at the end of the proposed residential court (near to boundary with Harrow View) and provision of soft/ hard landscaping in place and the reduction in the decked area over the proposed pond.

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 to the creation of a high quality, accessible, safe and attractive public realm and to ensure a high standard of design, layout and amenity.

12 Notwithstanding the submitted biodiversity protection and enhancement strategy, the development hereby approved shall not progress above damp proof course level in relation to each sub-phase (as so agreed pursuant to condition 6 (Phasing Strategy) of outline permission granted under ref: P/2165/15) until the following details have been submitted to, and agreed in writing by, the local planning authority:

- a) provision of the required numbers, locations, specification of bat boxes, bird boxes and invertebrate shelter boxes (which shall include 'built in' features where feasible);
- b) hard and soft landscape details and planting plans (including details for any climbing plants) where appropriate for the green/ brown roofs which shall include written specification of the planting and the biodiverse roof detail build-up of the layers, including the substrate and schedules of plants, noting species, plant sizes or types (all at time of planting) proposed numbers / densities and details of the maintenance including irrigation; and
- c) details of how the proposed enhancements would be monitored and the methodology on how the results would be reported/ recorded to relevant authorities.
- d)

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

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

13 The development hereby approved shall not progress above damp proof course level, until a School Operational Access and Management Strategy (SOAMS) has been submitted to the Local Planning Authority in writing for approval.

The SOAMS shall include the following:

Details of how permanent operational access identified in a scaled plan will be provided and retained, demonstrating; that permanent vehicular access for the School on development plot A6 (for servicing and staff/ visitor parking only) shall be made available from the approved shared surface route and through the green link and pedestrian access along the approved shared surface route (located on development plot D7) for the School.

The development shall only be completed and operated in accordance with the approved SOAMS and the requirements of the above shall be retained in place in perpetuity, unless otherwise agreed in writing by the local planning authority.

REASON: To ensure that the delivery of the proposed School at operational stage is not prejudiced by the proposed development and to ensure that the aspirations of the wider Harrow View Masterplan to bring forward a sustainable community development is met.

- 14 The development hereby approved in relating to Block F, shall not progress above damp proof course level until a detailed strategy has been submitted to, and agreed in writing by, the local planning authority, outlining what measures would be put in place to ensure that the refuse bins located within Blocks F2, F3 and F4 are rotated to ensure that there is sufficient capacity to meet the needs of the residents. The measures shall be carried out in accordance with the strategy so agreed and shall be retained as such thereafter.

REASON: To safeguard the amenity of the future residents.

- 15 The development hereby approved shall not progress above damp proof course level in relation to each sub-phase (as so agreed pursuant to condition 6 (Phasing Strategy) of outline permission granted under ref: P/2165/15) until a strategy for the efficient use of mains water within the residential parts of the development, pursuant to a water consumption limit of 105 litres per person per day, has been submitted to, and agreed in writing by, the local planning authority. The development shall be carried out in accordance with the strategy so agreed and shall be retained as such thereafter.

REASON: To ensure that the development makes efficient use of mains water.

- 16 Prior to commencement of any works relating to the existing boundary wall along Harrow View, a detailed method statement shall be submitted to, and agreed in writing by, the local planning authority detailing how the works associated with the reduction in the height and part removal of the existing boundary wall along Harrow View would be undertaken. Details shall include the period/ duration of works, methodology of boundary works, safety measure to be put in place along the public footpath to safeguard pedestrians and the highway. The development shall be carried out in accordance with the details so agreed.

REASON: To ensure works associated with the boundary wall do not impede on pedestrian/ highway safety and to ensure that the works are undertaken to not harm any retained trees on the site.

### **Pre Occupation Conditions**

- 17 The development hereby approved shall not be first occupied in relation to each sub-phase (as so agreed pursuant to condition 6 (Phasing Strategy) of outline permission granted under ref: P/2165/15) until a scheme for the on-going management, management programme of works and maintenance of all the hard and soft landscaping within the development, to include a Landscape Management Plan, including long term design objectives, management responsibilities and maintenance schedules for all landscape areas (including communal residential areas), other than small, privately owned, domestic gardens, shall be submitted to, and approved in writing by, the local planning authority prior to the occupation of the development or any sub-phase of the



development, whichever is the sooner, for its permitted use. The Landscape Management Plan shall be carried out in a timely manner as approved.

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

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 within the Heart of Harrow and to ensure a high standard of design, layout and amenity.

- 18 The development hereby approved shall not be first occupied in relation to each sub-phase (as so agreed pursuant to condition 6 (Phasing Strategy) of outline permission granted under ref: P/2165/15) until a schedule of landscape maintenance for a minimum period of 5 years, from implementation of final planting, has been submitted to, and approved by, the Local Planning Authority. The schedule shall include details of the arrangements for its implementation. Maintenance shall be carried out in accordance with the approved schedule. The development shall be carried out in accordance with the scheme so agreed and shall be retained as such thereafter.

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

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 within the Heart of Harrow and to ensure a high standard of design, layout and amenity.

- 19 Prior to the first occupation of each sub-phase (as so agreed pursuant to condition 6 (Phasing Strategy) of outline permission granted under ref: P/2165/15), details of a strategy for the provision of communal facilities for television reception (eg. aerials, dishes and other such equipment) shall be 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 of the relevant sub-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 and to ensure that the development achieves a high standard of amenity for future occupiers the buildings.

- 20 Prior to first occupation of each sub-phase (as so agreed pursuant to condition 6 (Phasing Strategy) of outline permission granted under ref: P/2165/15) evidence of Secured by Design Certification shall be submitted and approved in writing by the local planning authority. The development shall be retained in accordance with the approved details.

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

- 21 Prior to occupation of each sub-phase (as so agreed pursuant to condition 6 (Phasing Strategy) of outline permission granted under ref: P/2165/15), details of the arrangements for the distribution of mail (including any mail boxes) and other deliveries to residents within the development shall be first submitted to, and agreed in writing by, the local planning authority. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development contributes to the achievement of a lifetime neighbourhood and a high standard of design and layout.

- 22 The development shall be undertaken in accordance with the approved Sustainability Statement and Energy Strategy. Within 3 months (or other such period agreed in writing by the Local Planning Authority) of the final completion in relation to each sub-phase (as so agreed pursuant to condition 6 (Phasing Strategy) of outline permission granted under ref: P/2165/15) 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.

### **General Conditions**

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

REASON: To safeguard the appearance and character of the surrounding area and to ensure a high standard of residential quality in accordance.

- 24 The erection of fencing for the protection of any retained tree shall be undertaken in accordance with the approved plans and particulars before any equipment, machinery or materials are brought on to the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition, and the ground levels within those areas shall not be altered, nor shall any excavation be made, without the written consent of the local planning authority.

REASON: To ensure appropriate safeguards are in place to protect any retained tree on site.

## Informatives

- 1 The following policies are relevant to this decision:

National Planning Policy Framework (2012)

The London Plan (2016)

Policies: 3.3, 3.4, 3.5, 3.6, 3.8, 3.11, 3.12, 5.1, 5.2, 5.3, 5.7, 5.11, 5.12, 5.13, 5.18, 6.3, 6.9, 6.13, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.8, 7.13, 7.14, 7.15

The Draft London Plan (2017)

Policies: D1, D2, D3, D4, D5, D6, D7, D13, H1, H5, H7, G6, G7, SI3, S15, SI12, SI13, T5, T6, T6.1

The Harrow Core Strategy (2012)

Core Policies CS1

Harrow and Wealdstone Area Action Plan (2013)

Policies: AAP 1, AAP 3 AAP 4, AAP 5, AAP 9, AAP 11, AAP 13, AAP 19, AAP 20

Development Management Policies Local Plan (2013)

Policies DM 1, DM 2, DM 7, DM 10, DM 12, DM 14, DM 28, DM 42, DM 49

Supplementary Planning Document – Residential Design Guide (2010)

Code of Practice for Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (2016).

Mayors Housing Supplementary Planning Guidance (2016)

Mayors Accessibility Supplementary Planning Guidance (2014)

- 2 CONSIDERATE CONTRACTOR CODE OF PRACTICE

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

- 3 PARTY WALL ACT:

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

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

and that work falls within the scope of the Act.

Procedures under this Act are quite separate from the need for planning permission or building regulations approval.

"The Party Wall etc. Act 1996: Explanatory booklet" is available free of charge from:

Communities and Local Government Publications, PO Box 236, Wetherby, LS23

7NB

Please quote **Product code:** 02 BR 00862 when ordering

Also available for download from the CLG website:

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/133214.pdf>

Tel: 0870 1226 236 Fax: 0870 1226 237

Textphone: 0870 1207 405

E-mail: [communities@twoten.com](mailto:communities@twoten.com)

- 4 **COMPLIANCE WITH PLANNING CONDITIONS**  
**IMPORTANT: Compliance With Planning Conditions Requiring Submission and Approval of Details Before Development Commences**
  - You will be in breach of planning permission if you start development without complying with a condition requiring you to do something before you start. For example, that a scheme or details of the development must first be approved by the Local Planning Authority.
  - Carrying out works in breach of such a condition will not satisfy the requirement to commence the development within the time permitted.
  - Beginning development in breach of a planning condition will invalidate your planning permission.
  - If you require confirmation as to whether the works you have carried out are acceptable, then you should apply to the Local Planning Authority for a certificate of lawfulness.
  
- 5 The applicant is advised to engage with the Designing Out Crime Officer at an early stage of the detailed design stage in respect of meeting the requirement of Secured by Design condition.

Plan Nos: TBC

## **APPENDIX 2: Transport for London Comments**

Regarding Plot D7, Condition 20 requires that a detailed transport strategy should accompany reserved matters applications for each stage. As for Phase A, the supplied report cannot be considered “detailed”. Looking in turn at each of the points listed in condition 20:

- a) There is more detail on parking management than for Phase A but I believe it is still lacking. For example:
  - There is no indication of how an excess in demand for parking permits is dealt with.
  - Only 17 spaces for residents will meet the size/layout requirements for use by people with disabilities. This is 10% of the total proposed parking provision, rather than 10% of the number of residential units (i.e. matching the number of wheelchair-accessible residential units, although direct allocation of spaces to
  - those units should not be pursued as not all people with disabilities will need a wheelchair-accessible residential unit). This low level of parking provision for people with disabilities cannot be said to meet the London Plan requirement (that an adequate number are provided) without evidence to support it.
- b) It is not acceptable to rely on any cycle parking provision that involves taking bikes through residential units. Assess to the “cycle parking for houses ... within the curtilage of the unit within the garden” should be fully explained. Insufficient detail is provided on the cycle parking for apartments. The drawings submitted seem to indicate that the majority of cycle parking stands will be “stacking” racks, and some will be in hanging racks or folding bike lockers. Hanging racks and lockers for folding bikes do not meet the London Plan requirements. Stacking racks are:
  - Not suitable for children’s bikes, tricycles, tandems, cargo bikes or bike trailers
  - Require a good degree of physical strength and dexterity to use both the upper and lower tiers, something which the applicant cannot rely upon among a residential population including older and disabled residents
  - Require a reasonable aisle width to allow the bike to be presented straight-on to a lowered top-tier rack, otherwise it is necessary to lift the bike in its entirety rather than just the front and then rear wheels separately

To be accessible, a good proportion of cycle parking stands should be traditional “Sheffield” stands, with generous spacing and not included as the lower tier of stacking racks. Further, direct access to the cycle store only from outside the building (i.e. not also from within a lobby) may present user safety and security concerns which should be considered.

Once change have been made to address these comments, a summary table of the provision within each cycle store and comparison against the requirement will be needed for a full assessment of the quantum of cycle parking against London Plan standards.

- c) Use of electric vehicle charging points will depend on whether the permit allocated to a driver is adjacent to a point. How will this be managed to allow those who, in years to come, obtain an electric vehicle? What will trigger bringing passive charging provision into use?
- d) Pick-up and drop-off points for the primary school are not relevant to this application.
- e) Parking for powered two-wheeled vehicles is acceptable to TfL.
- f) The text on pedestrian and cycle routes is adequate except for the proposed use of these routes by refuse collection vehicles, which is not an appropriate, and the discussion of the pedestrian crossing in paragraph 4.36. Regarding this latter point, is it the intention that a pedestrian crossing of Harrow View is merely indicated by a change in surface? Surface treatments do not signify a pedestrian “right of way”.
- g) As for phase A, vehicle, cycle and pedestrian signage is deferred to the detailed design stage, which is not a fulfilment of this condition.
- h) The text on parking enforcement is somewhat simplistic. Will offending vehicles be identified from patrols or from complaints from the person authorised to park in that space (if the latter, there is potential for permit holders to sub-let that space). Verbal and written warnings hold no

weight, and the removal of a vehicle can only be undertaken by a registered car park operator and only if sufficient public notice has been given.

- i) Not applicable – relates to a multi-storey car park which is not included in this phase.
- j) The proposals are broadly in line with the Transport Assessment for the outline planning permission.

A travel plan was required (point xviii in the Planning Committee report dated 25/09/2015) but does not seem to be provided. That committee report also considered the provision of a Delivery & Servicing Plan and Construction Logistics Plan, but it is not clear if these were required – they are certainly not supplied in support of this application.

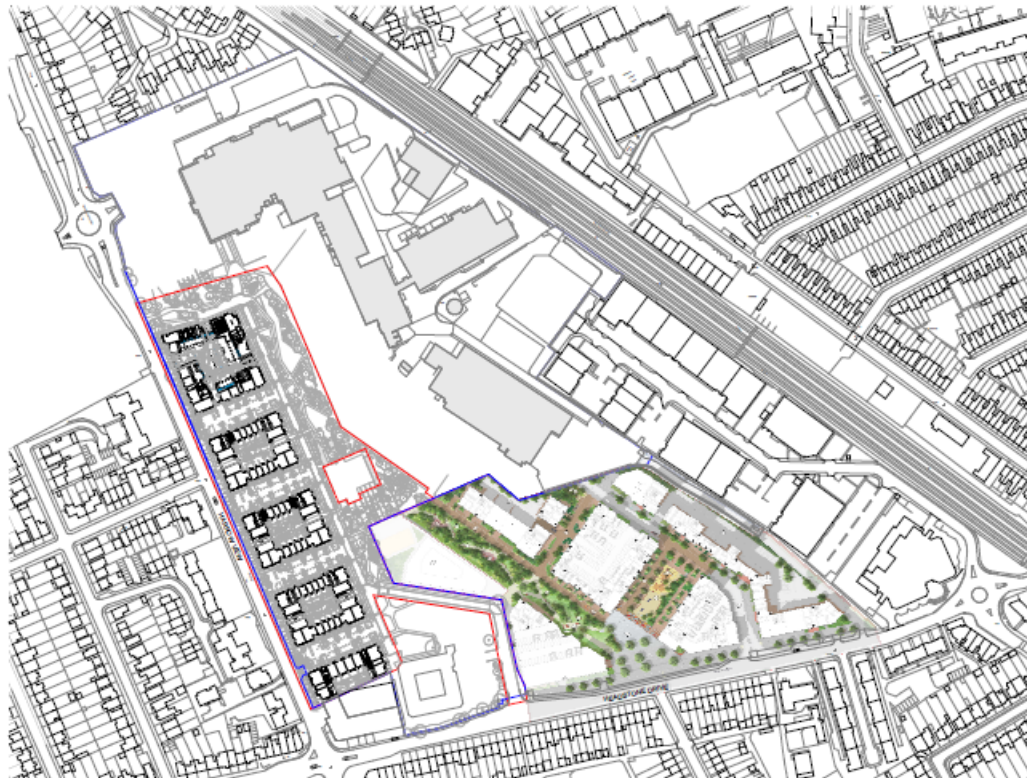
In summary, we find the supplied information falls far short of the standard we would expect and cannot consider that it fulfils the requirements of Condition 20.

Please contact me if you wish to discuss any of the above.

Yours sincerely,  
Tim

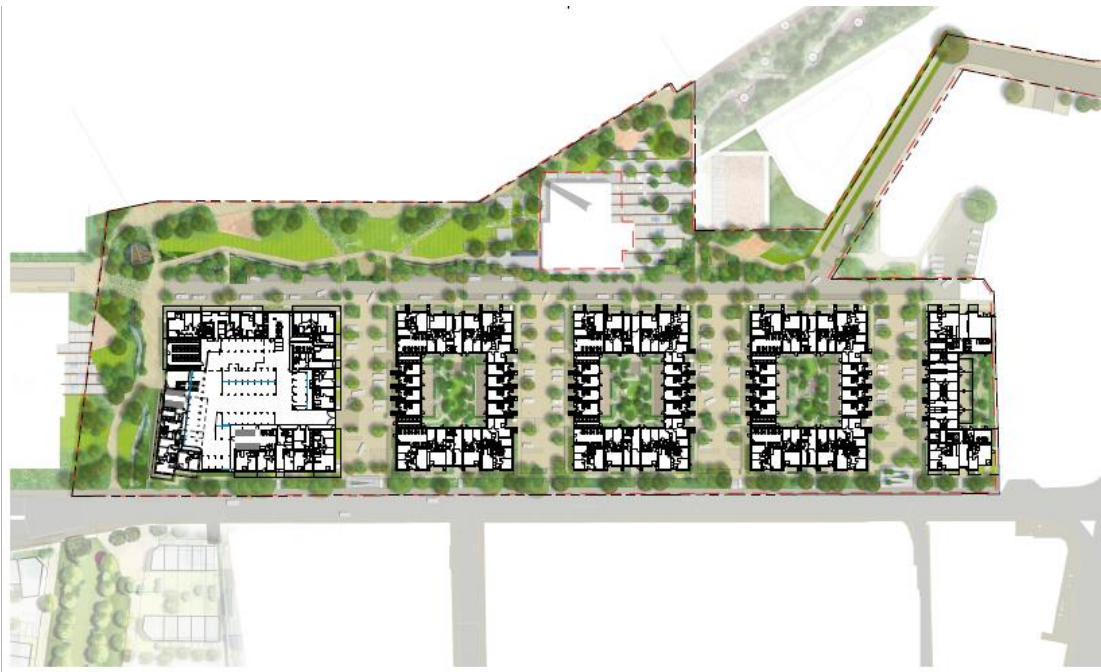
**Tim Gould**  
**Consultant Principal Technical Planner, TfL Borough Planning, Transport for London**

**APPENDIX 3: SITE PLAN**





## APPENDIX 4: PLANS AND ELEVATIONS



Proposed block arrangement.



Typical elevation of six storey block fronting the green link (Blocks C, D and E)





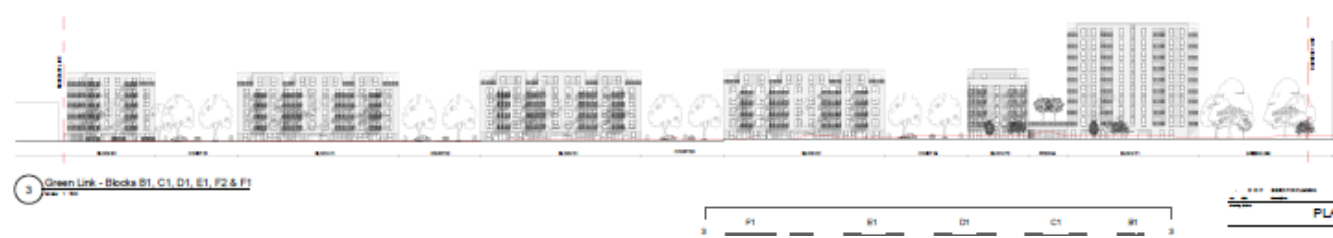
Elevation of Block F, fronting the green link



Elevation of Block F3 fronting the green link



Elevation fronting Harrow View



View along the green link (east)

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