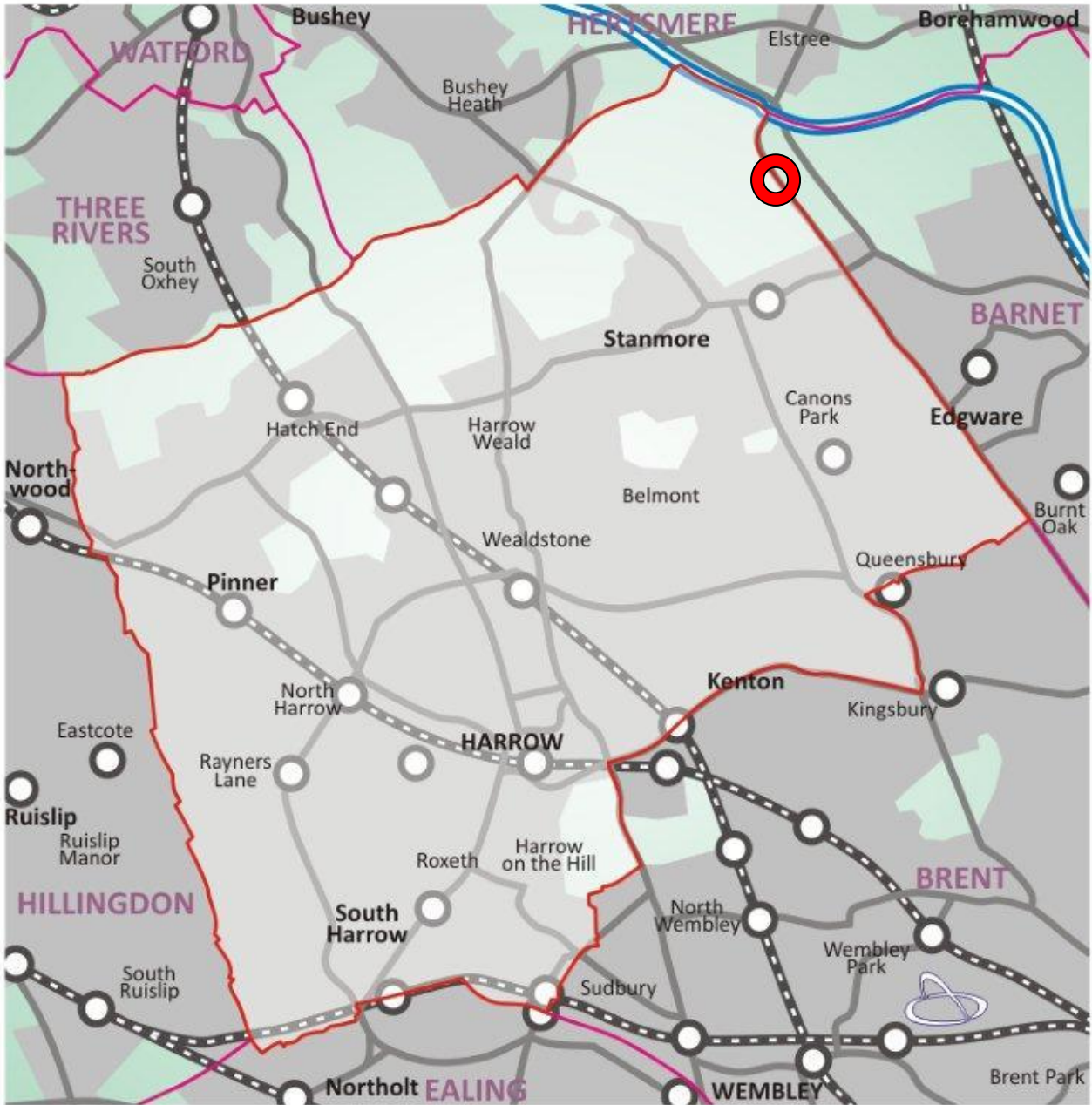
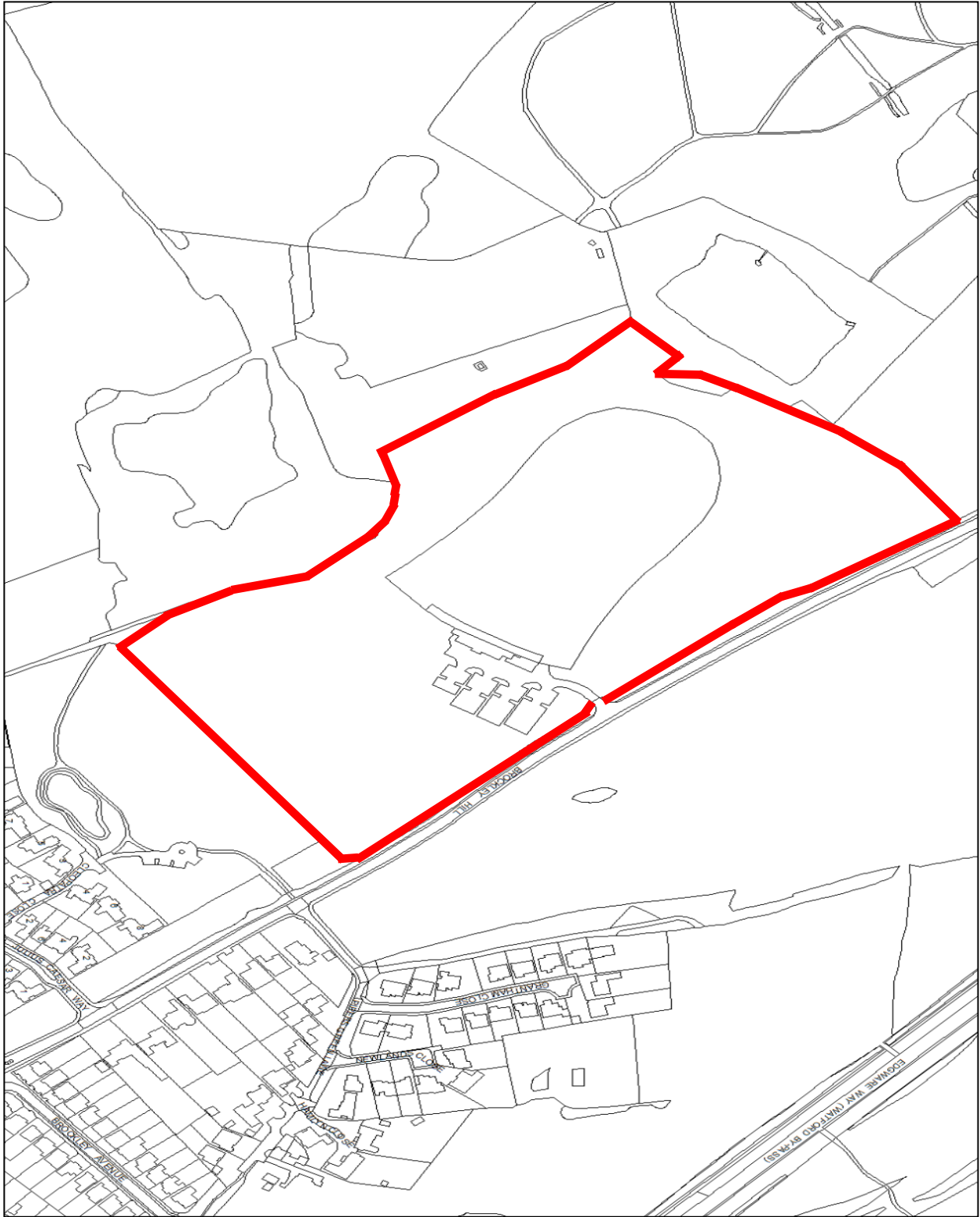


 = application site



Stanmore & Edgware Golf Centre, Brockley Hill, Stanmore	P/1525/17
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Stanmore & Edgware Golf Club, Brockley Hill, Stanmore	P/1525/17
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LONDON BOROUGH OF HARROW

PLANNING COMMITTEE

24TH JANUARY 2018

APPLICATION NUMBER: P/1525/17
VALIDATE DATE: 14/05/2017
LOCATION: STANMORE & EDGWARE GOLF CENTRE, BROCKLEY HILL, STANMORE
WARD: CANONS
POSTCODE: HA7 4LR
APPLICANT: DU PARCQ (JERSEY) LTD
AGENT: DLA TOWN PLANNING LTD
CASE OFFICER: NICOLA RANKIN
EXPIRY DATE: 14/07/2017 AGREED EXTENSION OF TIME: 15/12/2017

PURPOSE OF REPORT/PROPOSAL

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

“Change of use from a golf driving range with ancillary golf shop and first floor flat (Class D2) together with two storey rear extension and external alterations to nine flats (Class C3); Single storey detached building at side for use as replacement golf reception building; provision of parking, refuse and cycle facilities”

The Planning Committee is asked to:

RECOMMENDATION A

The Planning Committee is asked to:

- 1) Agree the reasons for approval and the conditions as set out in this report in appendix 1

REASON FOR THE RECOMMENDATIONS

The proposed change of use of the existing golf driving range building and its re-use for residential purposes, together with the associated landscape works, is considered to be appropriate development within the context of paragraph 90 of the NPPF (2012). Moreover, the proposed golf reception building, refuse compound and cycle store are considered to be appropriate development when considered within the context of bullets points 2 and 6 of paragraph 89 of the NPPF (2012). Overall, it is considered that the development would not be detrimental to the openness, purposes and visual amenities of the Green Belt. The proposed development would retain its rural character through use of matching materials which could be secured by planning condition. The proposed single storey reception building would be modest and would appear as a suitably subservient and well related addition and matching materials would also be utilized on

this building. All the residential units would benefit from generous living spaces and access to attractive amenity space. In view of the sustainable transport options identified, the number of units under consideration, the sites location and on the basis of the evidence within the submitted Transport Statement it is considered that the transport impacts of the proposal are acceptable. As such, having regard to all material considerations and responses to the consultation, the proposal is recommended for grant.

INFORMATION

This application is reported to Planning Committee as proposal relates to the conversion of a non-residential building to 9 dwellings and therefore falls outside Schedule 1(e) of the Scheme of Delegation.

Statutory Return Type:	(E) Minor Dwellings
Council Interest:	None
GLA Community Infrastructure Levy (CIL) Contribution (provisional):	£39690
Local CIL requirement:	£124740

HUMAN RIGHTS ACT

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

EQUALITIES

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

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

S17 CRIME & DISORDER ACT

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

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

- Planning Application
- Statutory Register of Planning Decisions
- Correspondence with Adjoining Occupiers
- Correspondence with Statutory Bodies
- Correspondence with other Council Departments
- National Planning Policy Framework

- London Plan
- Local Plan - Core Strategy, Development Management Policies, SPGs
- Other relevant guidance

LIST OF ENCLOSURES / APPENDICES:

Officer Report:

Part 1: Planning Application Fact Sheet

Part 2: Officer Assessment

Appendix 1 – Conditions and Informatives

Appendix 2 – Site Plan

Appendix 3 – Site Photographs

Appendix 4 – Plans and Elevations

OFFICER REPORT

PART 1: Planning Application Fact Sheet

The Site	
Address	Stanmore and Edgware Golf Club Centre, Brockley Hill, Stanmore, HA7 4LR
Applicant	DU Parcq (Jersey) Ltd
Ward	Canons
Local Plan allocation	N/A
Conservation Area	No
Listed Building	No
Setting of Listed Building	No
Building of Local Interest	No
Tree Preservation Order	No
Other	Adjacent to a Site of Importance for Nature Conservation Green Belt Archaeological Priority Area Part of the site lies in surface water flood zones 3a/3b

Housing		
Density	Proposed Density hr/ha	14.87
	Proposed Density u/ph	7.43
	PTAL	1a
	London Plan Density Range	No, below the LP density range.
Dwelling Mix	Studio (no. / %)	None
	1 bed (no. / %)	8
	2 bed (no. / %)	1
	3 bed (no. / %)	None
	4 bed (no. / %)	None
	Overall % of Affordable Housing	N/A
	Social Rent (no. / %)	N/A
	Intermediate (no. / %)	N/A
	Private (no. / %)	N/A
	Commuted Sum	N/A
	Comply with London Housing SPG?	Yes
	Comply with M4(2) of Building Regulations?	Part M of the Building Regulations does not apply to dwellings resulting from conversion or change of use

Transportation		
Car parking	No. Existing Car Parking spaces	90
	No. Proposed Car Parking spaces	60
	Proposed Parking Ratio	1.5
Cycle Parking	No. Existing Cycle Parking spaces	0
	No. Proposed Cycle Parking spaces	11
	Cycle Parking Ratio	1.2
Public Transport	PTAL Rating	1a
	Closest Rail Station / Distance (m)	Stanmore Station
	Bus Routes	Route 107 within 280 metres of the site Route 142, 900 m from the site along London Road
Parking Controls	Controlled Parking Zone?	No
	CPZ Hours	N/A
	Previous CPZ Consultation (if not in a CPZ)	N/A
	Other on-street controls	N/A
Parking Stress	Area/streets of parking stress survey	N/A
	Dates/times of parking stress survey	N/A
	Summary of results of survey	N/A
Refuse/Recycling Collection	Summary of proposed refuse/recycling strategy	Serviced from within the site, access from Brockley Hill

PART 2: Assessment

1.0 SITE DESCRIPTION

- 1.1 The application site relates to a golf centre and driving range located on the west side of Brockley Hill. The application site is located 1.9km to the north east of Stanmore Town Centre.
- 1.2 The wider site (not the application site itself) comprises a broadly rectangular site. The wider site comprises a 9-hole par-3 golf course, driving range and golf shop. The golf course is situated around the edges of the driving range.
- 1.3 The application site relates to an irregular shaped plot of land located towards the centre of the wider site and contains the main golf building, a hard surfaced car park and an area of soft landscape directly in front of the golf building which is in current use as a driving range.
- 1.4 Vehicular and pedestrian access is from Brockley Hill and is located towards the centre of the frontage.
- 1.5 The main building is linear in form and is part single storey/part 1.5 and two storeys in height. It is located adjacent to the site access, so as to occupy a relatively central position within the site.
- 1.6 The north western elevation facing onto the driving range houses 49 covered flood bays at single and two storey level with a shallow ridged roof above. Flood lights are provided to the roof of the individual bays.
- 1.7 The south eastern elevation of the building presents a 1.5 storey building but with a large hipped roof incorporating gable ends.
- 1.8 The southern half of the building contains the golf retail shop, the reception for the golf course and various office and storage areas at ground floor level. The first floor of the building contains office space and a flat for staff use.
- 1.9 To the rear of the north eastern single storey wing is an enclosed storage area containing storage containers, housing machinery and other green keeping equipment.
- 1.10 To the south east of the main golf building is a hard surfaced car park which is approximately 3000m² in area.
- 1.11 The driving range is situated to the north west of the main premises. In addition to the covered bays described above, there are also a number of outdoor driving range bays, located immediately to the south west of the main building.
- 1.12 A wire fence of approximately 5 metres in height has been erected around the driving range. This is secured by a number of metal pylons running around the perimeter of the range at a distance of approximately 15 to 20 metres apart.

There is also a substantial earth bund around the driving range covered by grass.

- 1.13 The area of land surrounding the driving range comprises the golf course and appears as a managed landscape with man-made features including green, bunkers and tee boxes.
- 1.14 The site is screened by mature trees and hedges to the entire perimeter of the site.
- 1.15 The application site is situated within the Green Belt and is within the Harrow Weald Ridge Area of Special Character.
- 1.16 The application site lies partially within an Archaeological Priority Area. This area relates to a strip of land which runs through part of the car park and golf course and on the other side adjacent to Brockley Hill.
- 1.17 The application site has a PTAL rating of 1a which is low.
- 1.18 Part of the site in front of the main golf building lies within surface water flood zone 3a/3b as identified on the Local Area Map (2013).
- 1.19 The immediate locality of the wider application site comprises a mix of residential and leisure uses.
- 1.20 To the south is Brockley Park an area of public open space including a small lake. The park abuts a residential cul de sac which links to the wider suburban area to the north of London Road.
- 1.21 Adjoining the wider application site to the north and west, this comprises a continuous open space of some 31 hectares of woodland and meadow.
- 1.22 Adjoining the wider application site to the north, Pear Wood comprises an area of ancient woodland of around 14 hectares which abuts Wood Farm to the west. The land opposite the application site on the eastern side of Brockley Hill is a large green space with mature trees in agricultural use

2.0 PROPOSAL

- 2.1 The application seeks planning permission for a change of use of a driving range with ancillary golf shop and first floor flat (Class D2) together with a two storey rear extension and external alterations to nine flats (Class C3) and a single storey detached building at side for use as replacement golf reception building.
- 2.2 The proposed accommodation would comprise of 8 x 1 bedroom apartments and a 1 x 2 bedroom apartment which would be located in the main two storey section of the premises.

- 2.3 The most significant change proposed to the main premises is the demolition of the two single storey wings to the north east and south west, measuring 16m x 6m and 22m x 6m respectively.
- 2.4 The north western elevation of the building would be enclosed in vertical horizontal boarding to match the existing to form a two storey extension to the main building. The building would retain its existing hip and gable roof form.
- 2.5 Elevational changes to the main building relate to fenestrational changes to the front (south), north west and flank elevations
- 2.6 A central first floor balcony is proposed to the north western elevation with approximately 21m² of floorspace
- 2.7 All windows and doors are proposed to be finished in aluminium materials.
- 2.8 A shared and open rectangular amenity space of 3,806m² would be provided to the north west of the building with the remainder of the driving range to be incorporated into the retained golf course.
- 2.9 A replacement golf reception building of approximately 65m² is proposed for the retained and enlarged golf course. The proposed building would be single storey and would be located immediately to the north east of the retained main premises on the site. It would contain the main reception together with ancillary storage areas and toilets.
- 2.10 The proposed golf building would have a hipped roof design and would be finished with concrete tiles and vertical painted timber boarding to match the main premises. The building would be 7.7m by 8.9m. It would have a maximum height of 5.3 metres and a height of 3.12 metres to the eaves.
- 2.11 The proposal would result in the removal of the 5m high wire fence/metal pylons to the perimeter of the driving range and floodlights to the driving range roof.
- 2.12 New planting is proposed to demarcate the proposed shared rectangular amenity space.
- 2.13 Part of the existing car park of approximately 320m² to the south west is proposed to be removed to provide a new landscaped area to the front of the main premises. This would result in the loss of a total of 30 car parking spaces.
- 2.14 The existing access point from Brockley Hill would continue to be utilised by future residents and users of the golf course.
- 2.15 As outlined above, part of the existing car park (1941m²) would be landscaped resulting in the loss of 16 spaces and a reduction in area of 320sqm to 1621sqm. A total of 60 car parking spaces would be retained of which 14 would be allocated to the proposed residential units and 46 being retained for the golf course. It is proposed that the 46 spaces could also be utilised by visitors to the flats.

2.16 The existing storage containers sited to the east of the building would be removed.

2.17 **Revisions since submission of application:**

- Revised floor plans showing modified layout
- Sections showing the internal floor to ceiling height
- Submission of an ecology report
- Additional planning statement containing further information in relation to the quality of the future accommodation, highways and surface water drainage and flooding.
- Changes to the internal layout resulting in the provision of 8 x 1 bedroom flats and a 1 x 2 bedroom flat instead of 7 x 1 bedroom flats and 2 x 2 bedrooms flats.
- Provision of a refuse and cycle store adjacent to the main building.

3.0 RELEVANT PLANNING HISTORY

3.1 There is no relevant planning history for this application site.

4.0 CONSULTATION

4.1 A general site notice was erected on 29th June 2017 expiring on 20th June 2017.

4.2 A total of 12 consultation letters were sent to neighbouring properties regarding this application on the 5th June 2017.

4.3 The overall public consultation period expired on 26th June 2017.

4.4 Following receipt of additional information outlined above a second consultation was undertaken. The second consultation commenced on 6th October 2017 and expired on 27th October 2017. A total of 12 consultation letters were sent to neighbouring properties as part of the second consultation.

4.6 Adjoining Properties

Number of letters Sent	12
Number of Responses Received	0
Number in Support	n/a
Number of Objections	n/a
Number of other Representations (neither objecting or supporting)	n/a

4.7 Statutory and Non Statutory Consultation

4.8 The following consultations have been undertaken:

LBH Environmental Health
LBH Highways
LBH Planning Policy
LBH Tree Officer
LBH Waste Officer
LBH Sport and Cultural Services
LBH Biodiversity Officer
LBH Drainage Authority
LBH Travel Plan Officer
Canons Park Resident Association
Historic England - GLASS
Environment Agency
Sport England
London Borough of Barnet

1.12 External and Statutory Consultation

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

Consultee	Summary of Comments	Officer Comments
Environment Agency	We have no comments to make on this application as the only constraint is that the site is over 1 ha. We would have reviewed this in the past when we were being consulted on surface water.	Noted.
Historic England Archaeology	Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets or archaeological interest. An archaeological evaluation carried out in 1995 along the eastern edge of the site (along the line of Brockley Hill road) recorded the remains of the Roman Watling Street and roadside ditch.	Noted.

	<p>The area of the proposed impact is small and lies away from the line of the Roman road, within the footprint of the existing structure. Large development at this location or development of areas which have undergone little or no past development would warrant further investigation. In this instance it is unlikely that the proposed works would have an archaeological impact.</p> <p>No further assessment or conditions are therefore necessary.</p>	
Historic England Ancient Monuments	No comments	Noted.
London Borough of Barnet	No objection	Noted
LBH Highways Comments received on 04/07/2017:	<p>This proposal is within a PTAL 1a location meaning that access to public transport is poor. There are very limited options for sustainable travel at this location as it is a considerable walking distance from the general amenities that you would expect to find on a High Street. There are limited facilities at Canons Corner (A5/Spur Road jcn). It is likely that residents of the proposed development would use a car to travel.</p> <p>This proposal seeks a reduction in onsite parking from 90 to 74 with nine being allocated to the residential element. No information on current usage of the parking facility has been provided. The design and access statement indicates that there would be a reduction in trips but there is no information to support this. We do not know how frequently the driving range is currently used and what percentage of this applies to the</p>	

	<p>overall parking demand for the whole golf course. Without this information it isn't possible to determine whether this proposal would cause any harm. Whilst it is agreed that a full transport assessment isn't required, a transport statement would be of benefit.</p> <p>Disabled parking must be provided. The London Plan and Harrow Council policies require a minimum of one disabled bay and one for each wheelchair home. Electric vehicle charging points at a rate of 20% active and 20% passive provision and a minimum of 11 secure, sheltered and accessible cycle parking spaces are also required.</p>	
<p>LBH Highways Comments Received on 06/10/2017</p>	<p>The new transport statement further confirms that there is an excess of parking for this proposal. I have no substantial objection to this, however, the level proposed far exceeds the maximum standards of the London Plan and subsequently, the Harrow Development Management Policies. At its highest, it would appear that the anticipated demand for parking is 45 vehicles and even when combined with the anticipated demand from the flats proposal, there is still no need for 74 spaces.</p> <p>Unfortunately the accident report has not been included in the TS, however it does appear from the plot locations that two of the slight accidents were recorded at or near the access to the existing site. Whilst not a major concern, it would be useful to see what the report indicated were the circumstances surrounding these incidents to ensure that no traffic management measures or improvements are</p>	<p>Further comments were sought from the applicant in relation the level of parking spaces, including disabled parking and accident data.</p> <p>Suitable planning conditions are recommended to secure the minimum level of secure cycle parking spaces and electric vehicle charging points.</p>

	<p>required.</p> <p>Disabled parking must be provided. The London Plan and Harrow Council policies require a minimum of one disabled bay and one for each wheelchair home. Electric vehicle charging points at a rate of 20% active and 20% passive provision and a minimum of 11 secure, sheltered and accessible cycle parking spaces are also required.</p>	
<p>LBH Highways Comments Received on 06/10/2017</p>	<p>The applicant has confirmed that the overall parking provision would be 60 spaces which is considered to be acceptable.</p>	<p>A condition is recommended to ensure that the maximum number of parking spaces for residential use and for the golf club use is restricted.</p>
<p>LBH Travel Plan officer</p>	<p>A Travel Plan Statement would be required for this development.</p>	<p>Noted. A condition is recommended for a TP Statement to be submitted and approved by the LPA prior to the occupation of any units.</p>
<p>LBH Drainage Authority Comments received on 30.06.2017</p>	<p>With regard to the above application, insufficient information is submitted for the FRA to be approved. Please request the applicant to submit a drainage layout for the proposed development with sw storage tank details. Also, please be advised that FFL of a new dwelling should be raised 300mm above flood level of up to 600mm (in total 900mm above ground level).</p>	<p>Noted. Further details were sought from the applicant and additional comments from LBH drainage are outlined below.</p>

<p>LBH Drainage Authority Comments received on 09/10/2017</p>	<p>The additional information provided is still insufficient and further details how the area will be re-graded are required. The applicant should provide proposed ground levels with flood water flows around a new construction, impact on the existing car park due to additional run-off, full protection details of ground floor from flooding. Please note that the proposed FFL is much lower than the surrounding area.</p>	<p>Noted. Further details were sought from the applicant and additional comments from LBH drainage are outlined below.</p>
<p>LBH Drainage Authority Comments received on 17/11/2017</p>	<p>Further to your recent e-mail, I can confirm that we have no objections to the proposed development however, full drainage design together with ground re-grading and bio-retention details should be provided before commencement of the development. Attached are our standard requirements.</p>	<p>Noted. Conditions are recommended to address the specific and standard drainage issues.</p>
<p>LBH Biodiversity Officer Comments received 12.06.2017</p>	<p>This development will involve the clearance of potential nesting bird habitat (i.e. removal of trees, hedging, dense shrubs and dismantling/demolition of any building) and should be ideally undertaken outside the breeding bird season, i.e. should be undertaken in the period September to February inclusive. Should it prove necessary to clear nesting bird habitat during the bird nesting season, then a pre-works check for nesting birds should be undertaken, by a CIEEM ecologist (within 24 hours of any works). If any active nests are found, activities (e.g. tree felling / vegetation clearance / building dismantling / demolition) should cease and an appropriate buffer zone should be established. This buffer zone should be left intact until it has been confirmed that the young have fledged and the nest is no longer in use. Policy DM 20 – Point A & The Wildlife & Countryside Act 1981. This is just a</p>	<p>Noted. In response to these comments an ecological report was sought from the applicant. Please refer to the further comments below.</p>

	<p>pre commencement check.</p> <p>We would like to see nesting opportunities for swifts (at least 6) and roosting bats (at least 2) opportunities integrated into the design of this development, as an enhancement for nature. Policy DM 21 – Point A</p> <p>We feel the building has the potential for housing protected species given its location and suitable habitat connectivity, and therefore we do require a preliminary protected species survey to be undertaken by a CIEEM ecologist before determination this may lead to further surveys and/or mitigation needing to be undertaken including a construction management plan to remove any negative effects the development may have on the surrounding natural environment. Policy DM 20 – Point A & The Wildlife & Countryside Act 1981.</p> <p>Any planting scheme should not contain non-native plants that could become invasive, such as Laurel, bamboo, Cotoneaster, Rhododendron and any other Schedule 9 species (Part 2 of the Wildlife & Countryside Act 1981).</p>	
<p>LBH Biodiversity Officer Comments received on 13/10/2017</p>	<p>Generally the conclusions of the report are considered to be ok. However, the following information would have been expected in the report:</p> <ul style="list-style-type: none"> • I would have expected any desktop survey to have included a data request being made to GiGL. Reliance upon MAGIC and ‘other freely available information on the internet’ is not in accordance with best practice. • The report fails to mention the local wildlife site status of either 	<p>The comments are noted. Further clarifications and information was sought from the applicant and further comments are noted below.</p>

	<p>Stanmore Country Park or Stanmore Common (other than that they are LNRs {as seen on MAGIC}), and consequently misses out at least one very large SINC altogether further highlighting the need for a full data search when engaged in such work.</p> <ul style="list-style-type: none"> • There are references to species records within 2km of the site. It has not been made explicit whence such records were sourced, how old they are or who collected the records. I would like the consultant to clarify. • The report references the 'Greater' London Biodiversity Action Plan but not that for Harrow. For example, BAP Action 3d is entirely relevant here and hedgehog (a Harrow BAP It also cites the UK BAP which hasn't been current since 2012. • There also appears to be no consideration of NERC Act Section 41 priority species which a local planning authority ought to be having regard to as material consideration under the NPPF. It could be that the evidence presented by the applicant is not complete enough to allow a lawful determination to be made. However, it is accepted that the applicant does appear to have complied with what was requested of them on the information front.] • There is no appraisal of what the - admittedly low – impact on biodiversity will be. Ideally, there should be some calculation based on the Defra Offsetting Metric so that the loss of low quality habitat by enhancement within any new development, the wider area or elsewhere in the borough. The NPPF already calls for net biodiversity gain in 	
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	<p>development.</p> <ul style="list-style-type: none"> • Bare ground beneath the plantation of trees? One would suspect that this looks rather different in spring time. • Reference is made to S.74 of the CROW Act. This was repealed under the NERC Act in 2006. <p>Whilst the general conclusions of the report are considered to be reasonable, we would expect the application to put effort into achieving net gain for biodiversity within the design, particularly with relation to the Harrow Biodiversity action plan.</p> <p>With regard to Policy DM21A, this should include bat bricks, swift bricks and invertebrate bricks on the new build walls plus boxes for bats, house sparrows (which the existing vegetation suggests may use the site) and swifts on the converted building. New plantings should preferably be of a mix of native shrub and tree species. Alternatively, channelling roof runoff through swales to 1 or more ponds would also add wildlife value. Additionally, modifications to the management of the golf course to enhance the value of the 'carry' areas of each hole would also be welcomed.</p>	
<p>LBH Biodiversity Officer Comments received on:</p>	<p>The revised report address all that appears necessary.</p>	<p>Noted.</p>
<p>LBH Environmental Health Officer</p>	<p>I have no objection to the principle of this application. However, I would request the standard contaminated land condition be applied if permission is granted.</p>	<p>Noted. A condition is recommended in relation to contaminated land to ensure the proposal would not be</p>

		harmful in this regard and would be consistent with the development plan.
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5.0 POLICIES

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

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

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

5.3 In this instance, the Development Plan comprises The London Plan 2016 [LP], the Draft London Plan (2017) 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 The Draft new London Plan was published on 29th November 2017. The current 2016 London Plan is still the adopted Development Plan. However the Draft London Plan is a material consideration in planning decisions. It gains more weights as it moves through the process to adoption and the weight given to it is a matter for the decision maker. The Draft London Plan consultation takes place between 1 December 2017 and 2 March 2018, prior to Examination in Public in Autumn 2018 and that at this stage carries limited weight.

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

5.6 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

Character and Appearance of the Area
Residential Amenity and Accessibility
Transport and Parking
Flood Risk and Drainage
Impacts on Trees and Biodiversity
Sustainability
Archaeology
Regeneration
Equalities Implications
Crime and Disorder Act

6.2 Principle of Development

6.2.1 Paragraph 14 of the NPPF makes clear that there is a presumption in favour of sustainable development. It states that “For decision making this means approving development proposal that accord with the development plan without delay; and where the development plan is absent or silent, or relevant policies are out of date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted”.

Impact on the Green Belt Openness and Purposes of the Green Belt

6.2.2 The Stanmore and Edgware Golf Club is located in the Green Belt. Paragraphs 79 – 92 of the National Planning Policy Framework (2012) provide policy guidance in relation to ‘Protecting Green Belt Land’, stating that the fundamental aim is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and their permanence.

6.2.3 With regard to the purposes of Green belt land, paragraph 80 identifies 5 main purposes as follows:

- To check the unrestricted sprawl of large built up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns;
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

6.2.4 Policy 7.16 of the London Plan supports the aim of the NPPF and states that ‘the strongest protection should be given to London’s Green Belt....Inappropriate development should be refused except in very special circumstances.’ This is carried forward in the Draft London Plan Policy G2. This is further supported by Policy CS1.F of Harrow’s Core Strategy which seeks to safeguard the quantity and quality of the Green Belt from inappropriate or insensitive development.

6.2.5 Paragraph 87 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The NPPF goes on to inform the determination of whether any particular development in the Green Belt is appropriate or not, by stating in paragraph 89 that ‘a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt’. It does however set out six exceptions to this, including:

- Building for agriculture and forestry
- Provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.
- The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building.
- The replacement of a building, provided the same building is in the same use and not materially larger than the one it replaces.
- Limited infilling in villages and limited affordable housing for local community needs under policies set out in the Local Plan; or
- Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.”
(Paragraphs 87-89)

6.2.6 Following on from this paragraph 90 clarifies that certain other forms of development are also not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. This includes “The reuse of buildings provided that buildings are of permanent and substantial construction”.

6.2.7 Policy DM 16 of the Harrow Development Management Policies Local Plan (2013) reflects the aims of paragraph 89 of the NPPF (2012). Policy DM 16 outlines that “*The redevelopment or infilling of previously developed sites in the Green Belt and Metropolitan Open Land will be supported where the proposal would not have a greater impact on the openness of the Green belt and Metropolitan Open Land, and the Purposes of including land within it, than the existing development, having regard to:*

a: the height of existing building on the site;

b: the proportion of the site that is already developed;

c: the footprint, distribution and character of existing buildings on the site; and

d: the relationship of the proposal with any development on the site that is to be retained.”

6.2.8 In relation to partial infilling and redevelopment, policy DM 16 also requires that proposal are put forward in the context of a comprehensive, long term plan for the site a whole. Proposals are also required to have regard to the visual amenity and character of the Green Belt.

- 6.2.9 For the purposes of assessing the proposed alterations to the existing golf building and the change of use to provide residential accommodation, it is considered that sub paragraphs 3 and 6 under paragraph 89 as well as paragraph 90 are also relevant.
- 6.2.10 The application sites which contains the main golf building, a hard surfaced car park and an area of soft landscape directly in front of the golf building which is in current use as a driving range is considered to form previously developed land as defined in the definitions within the NPPF (2012).

Change of use of existing building

- 6.2.11 The proposals would involve the alteration of the existing building on site by enclosing the existing open north western façade with timber boarding, effectively providing an additional two storey extension to the existing buildings internal accommodation. Nevertheless it is accepted that the enclosure and internal alterations of this façade would not give rise to additional floorspace for the purposes of understanding the enlargement of the building, given the existing driving range bays are fully covered and only open on one side. The proposal would result in the demolition of two substantial single storey wings providing covered bays for the driving range resulting in a reduction of 259m² from the existing floorspace. Nevertheless, it should also be noted that there would be an increase of some 21m² through the provision of the proposed balcony to the first floor. Furthermore additional new structures would be introduced across the site including a golf reception building (footprint of 69m²) and a bin store (footprint 45m²) to the north east of the main premises and a cycle store located within the adjacent parking area (footprint of 40m²). The alterations in relation to footprint floor space and volume of the golf building and the proposed adjacent structures are set out in the table below:

	Existing	Proposed					Proposed Reduction	
		Residential	Reception	Bin Store	Cycle Store	Total	Area/Volume	
Footprint	850m ²	548m ²	69m ²	45m ²	40m ²	702m ²	148m ²	17%
Floor space	1308m ²	980m ²	65m ²	43m ²	40m ²	1128m ²	180m ²	14%
Volume	4859m ³	3902m ³	266m ³	81m ³	120m ³	4369m ³	490m ³	10%

- 6.2.12 In addition, it is noted that there will be a decrease in the amount of hard standing of 320m² within the car parking area reducing from 1941m² to 1621m². The proposal will also see all the removal of 3 containers in the yard to the rear of the driving range/golf shop premises which have a volume of approximately 46m³. Notwithstanding this, it is considered that judging impacts on Green Belt openness involves more than a mathematical exercise of comparing existing and proposed footprints, floor space areas and volumes.

- 6.2.13 Having regard to the above figures and when balanced against the reductions in hardstanding and ancillary storage containers, it is considered that that as a whole the proposed development would result in notable improvements to the openness of the Green Belt when compared to the existing situation in respect of a reduction in overall built development.
- 6.2.14 The effect of paragraphs 87, 89 and 90 of the NPPF, when read together, is that all development in the Green Belt is inappropriate unless it is either development falling within one or more of the categories set out in paragraph 90 or is the construction of a new building or buildings that comes within one of the exceptions referred to in paragraph 89.
- 6.2.15 Paragraph 90 identifies other forms of development that are considered appropriate (subject to impacts on openness and not conflicting with the purpose of including land in the Green Belt) including mineral extraction, engineering operations, local transport infrastructure, the re use of buildings and development brought forward under a Community right to build order. It is noted that a material change of use which constitutes development under section 55 of the Town and Country Planning Act 1990, is not specifically identified.
- 6.2.16 However, paragraph 90 contemplates not merely the construction of buildings but 'other development' as defined by section 55 of the 1990 Act falling within the identified categories. Thus, it is considered that a change of use falling within one of the categories identified in paragraph 90 is in principle capable of being not inappropriate. The concept of development includes a material change of use and in this case a change of use from a golf driving range building to residential use together with ancillary communal garden land, which would involve the re-use of the existing building that is permanent and substantial in structure, would not conflict with paragraph 90 in officer's opinion. However, the principle of the proposed change of use of the building and adjacent surrounding land would be subject to preserving openness and not conflicting with the purposes of including land in Green Belt.
- 6.2.17 Other than the provision of a modest balcony of some 21m² and the infilling of the existing open sided North West sided elevation, there would be no extensions to the premises as discussed above. As can be seen from the above table, the demolition of the two substantial single storey wings providing covered bays for the driving range will result in a reduction in footprint/floorspace of 228m². Furthermore, even when balanced against the existing golf building, cycle and refuse store, the proposal when considered as a whole would still result in benefits as a whole to the openness of the Green Belt.
- 6.2.18 Within the supporting statement, the applicant outlines that the impact to the openness and visual amenities of the Green Belt would be ameliorated by the sensitive design approach. This includes the glazed balustrade to the proposed rear balcony. It is accepted that this element would be modest and the proposed materials would help minimise the impact by ensuring it is read against the mass of the main premises. In addition, the use of vertical timber

cladding would be used to enclose the north western elevation which would match the existing. It is also accepted that this would help reduce the impact of the building and would help maintain its barn like appearance, appropriate to its rural setting. It is considered that both these factors together with the demolition of the single storey wings of the building would ensure minimal impacts on the surrounding locality so as to preserve the openness of the Green Belt.

6.2.19 The proposal would involve the provision of communal garden land to the north west of the main building approximately 3800sqm in area. This area is currently partly hard surfaced and would be re-landscaped with soil, grass and planting. This work could fall within an 'engineering operation' and therefore is not inappropriate development in view of paragraph 90 of the NPPF (2012). However, it is acknowledged that this could be viewed as garden development by virtue of the change of use from the existing golf driving range land and therefore could be perceived as inappropriate development in the Green Belt. In view of this the applicant has put forward a case that 'Very Special Circumstances' exist to justify the development should it be concluded that the development is inappropriate or would impact on Green Belt openness and or the purposes of Green Belt. This is discussed in more detail below.

6.2.20 With regard to the proposed communal garden land, the applicant has outlined that the provision of flatted accommodation and an open area provides control over the potential for ad hoc residential paraphernalia to spread. As such, given the flats do not have permitted development rights, the area would remain open and would be landscaped and planted with native trees. The activities associated with residential garden land which would primarily be for recreational use, is considered not to be inconsistent with the purposes of Green Belt land. The NPPF is clear that local planning authorities should plan positively to enhance the beneficial use of the Green Belt land and look to provide opportunities for outdoor sport and recreation, to retain and enhance landscapes and to improve visual amenity and biodiversity (paragraph 81). It is outlined that any perceived impact would be more than offset by the removal of the existing floodlights to the rear elevation and the 5m high wire fence and pylons and an area of hard standing of 280m² currently used for parking and the corresponding increase in the soft landscaped area to the front of the main premises. It is accepted that removal of these elements of the site would result in some significant visual improvement and some benefits in terms of the openness of the Green Belt.

New Buildings and structures

6.2.21 The proposed new building and structures would consist of the golf reception building, the cycle storey and the bin compound. In respect of the proposed bin store, this would be an unroofed walled enclosure, 1.8m high and 7.5m by 6m. As a structure without a roof, it is accepted that it cannot have floor space in measuring impact on the Green Belt. However, even if taken into account its floorspace and footprint is a modest 45sqm and with a volume of 81cum. The proposed cycle store would measure 4.2m by 5.6m with an average height of 2.5m providing a footprint of 40sqm and volume of 120cum.

- 6.2.22 Paragraph 89 (bullet point 2) outlines that the provision of appropriate facilities for outdoor sport and outdoor recreation would be appropriate development in the Green Belt, as long as it would preserve the openness of the green belt and not conflict with the purposes of including land within it. The applicant acknowledges that in this case the new golf reception building is only required as a result of the proposed conversion of the existing. Nevertheless, national and local policy does allow for the partial redevelopment and the limited infilling of previously developed land in the Green Belt (NPPF, paragraph 89, bullet point 6) subject to the same caveats as bullet point 2. It is accepted that the application site which includes existing built development and associated fixed surface infrastructure does constitute previously developed land. It is therefore considered that the new buildings and structures are acceptable in principle.
- 6.2.23 The single storey height of the golf reception, cycle store and bin compound would be sited in close proximity to the existing main premises to be converted. As such, the siting and clustering of the buildings on and around the existing hard surfaced and developed areas is considered to be an appropriate response.
- 6.2.24 The height of the proposed golf reception building would be consistent with the height of the single storey driving range wings to be demolished. As a whole the proportion of the site to be developed would be significantly reduced. The reduction of the driving range bays will result in a significantly more compact form of development. In particular, the demolition of the longer south western wing of around 22m length will result in notable visual improvements. Furthermore, the proposed reception building would not extend beyond the extent of the north eastern wing to be demolished. It is considered that the compact hipped roof form and use of matching materials would ensure that the proposal was well related and subservient to the main premises. With regard to the proposed cycle store, this would be a modest timber structure which would be located opposite the proposed apartment building nestled amongst the exiting landscape. As such, due to its modest size, use of materials and siting would have an acceptable appearance within its Green belt setting. Similarly, the proposed refuse storage area would consist of a relatively low brick wall structure with timber doors and would be seen within the context of the existing and proposed built development.
- 6.2.25 Officers judge that when the proposed golf reception, cycle store and refuse compound are considered within the context of the proposal as a whole, they would result in no additional harm to the openness of the Green Belt in accordance with the NPPF and policy DM 16 of the local plan.

Purposes of Green Belt Land

- 6.2.26 Turning to the purposes of Green Belt land, Purposes of the Green Belt, Paragraph 80 of the NPPF states that the Green Belt serves five purposes and these are set out in the form of bullet points. In order to consider if the current proposal would impact on the purposes of including the application site within the Green Belt, it is therefore necessary to consider the proposal in the context of each of these bullet points.

1) **To check the unrestricted sprawl of large built-up areas:** The proposals would involve the re-use and alteration of an existing building and the provision of three modest structures on a previously developed part of the site. The application site is surrounded by a golf course and the boundaries of this wider site are occupied by mature trees and vegetation. There is therefore no physical connection between the area of land proposed for development and any large built-up areas. The proposal would not therefore lead to unrestricted sprawl of large built-up areas.

2) **To prevent neighbouring towns merging into one another:** Similarly, the lack of connection between the area of land proposed for development and the above-mentioned prevent this from happening. The proposal would not therefore exacerbate the merging of neighbouring towns into one another.

3) **To assist in safeguarding the countryside from encroachment:** The site is a recognised previously developed site in the Green Belt. Some encroachment is long established through the use of the site as a golf course and driving range. Furthermore, the existing building and proposed structures would be located entirely within a previously developed part of the site on existing hard surfacing and would therefore not encroach onto the countryside. Furthermore, a previously developed hard surfaced part of the site of approximately 320sqm would be converted to soft landscape as well as a further area to the in front of the north west elevation which would be used for communal landscaping.

4) **To preserve the setting and special character of historic towns:** This is not relevant to the circumstances of this site.

5) **To assist in urban regeneration, by encouraging the recycling of derelict and other urban land:** In this case whilst the proposed development would not be located in an urban area, it is considered that the scale of the proposal is the determining factor on this point. In officer's view, resisting 9 dwellings on the application site would not fundamentally prejudice the recycling of derelict and other urban land. As such, it is considered that the proposal would not conflict with this objective.

6.2.27 It is considered that the current proposal would comply with paragraph 80 of the NPPF in relation to the five purposes of the Green Belt.

Very Special Circumstances (VSC)

6.2.28 The applicant has put forward a case for 'Very Special Circumstances' which they say would outweigh any perceived impact by reason of inappropriateness. The first point relates to the benefits that would arise to Green Belt openness and purposes from a significantly more compact form of built development. The second point relates to a long term plan for the site.

6.2.29 The applicant asserts that the financial viability of the current operation is declining as a result of participation in and expenditure on golf and that this

reflects a national trend. In this particular case, the applicant indicates, revenue from the golf course and driving range on site has fallen by 32% since, with further declines predicted for 2016/17. The applicant also outlines that gold retail at this site is no longer viable, outlining that two of the most successful golf retailers in the country have operated from this site but both have gone out of business. A letter from the owner confirming this situation has been provided in support of the application. Having regard to these issues, the applicant argues that, the proposal would allow for the retention of an enlarged golf course and that the simpler method of alteration could significantly reduced costs. Moreover, it is stated that the provision of residential accommodation on the site is likely to appeal to golfers and would generate additional demand for the use of the retained facility.

- 6.2.30 Whilst the continued beneficial use of the site for recreation purposes is regarded by officers as a material consideration, in the absence of any further substantiation or support, for example the submission of financial accounts relating to the business, this is given limited weight.
- 6.2.31 The appellant asserts that great importance should be attached to increase in openness of the Green Belt compared to the existing building on site. Although, there is no explicit provision within the Framework to attached great weight in these circumstances, there is a notable difference between the two scenarios. As openness is one of the essential characteristics of Green belt land, it is considered that this element should be attributed substantial weight. The removal of the fence, pylons and flood lights and reduction in built development and hardstanding across the site would provide significant benefits to the openness of the Green Belt.
- 6.2.32 In officers opinion, 'Very Special Circumstances' need to be considered in the context of the level of potential harm/ inappropriateness (i.e. if only limited harm is being done to the openness, then the VSC to justify this are lower. In this case, by reason of the limited small scale of the development, its appropriate appearance and the nature of the proposed residential use, officers consider that the proposal would not be harmful to the Green Belt. However, if a different view is taken by members, officers consider the proposed benefits outlined above would outweigh any perceived harm.

Conclusion

- 6.2.33 The NPPF does not explicitly set out whether changes of use of land or buildings in the Green Belt are appropriate or not. However, it does allow for 'other development', which does not involve the construction of new buildings, to be considered. The NPPF does not state that the residential development in the Green Belt is not appropriate and in this case the openness of the Green Belt and its purposes would not be prejudiced. Furthermore, the re-instatement of soil and grass for the proposed communal amenity space and to the south east of the building would be regarded as and engineering operation. As such, the proposed change of use of the existing golf driving range building and its re-use for residential purposes, together with the associated landscape works, is considered to be appropriate development within the context of paragraph 90 of

the NPPF (2012). Moreover, the proposed golf reception building, refuse compound and cycle store are considered to be appropriate development when considered within the context of bullet points 2 and 6 of paragraph 89 of the NPPF (2012).

- 6.2.34 Overall, it is considered that the development would not be detrimental to the openness, purposes and visual amenities of the Green Belt.

Loss of Existing Community and Sport Facilities

- 6.2.35 The existing driving range would fall within the definition of a community facility as identified within the local plan. London Plan Policy 3.16 Protection and Enhancement of Social Infrastructure, Core Strategy Policy CS1 Z and Local Plan Policy DM47 Retention of Existing Community, Sport and Education Facilities provide the context for considering the loss of such facilities.
- 6.2.36 Policy 3.19 of The London Plan (2016) resists the loss of sports facilities. Similarly policy 3.16 of the London Plan (2016) supports high quality social infrastructures, accessible to all section of the community.
- 6.2.37 Policy DM 47 of the Harrow Development Management Policies Local Plan states that: *“Proposals involving the loss of an existing community, sport or educational facility will be permitted if:*
- a. there is no longer a need for that facility (having regard to the amount of local patronage, the quality of facilities offered and the duration and extent of marketing) or*
 - b. there are adequate similar facilities within walking distance which offer equivalent provision; or*
 - c. the activities carried on are inconsistent and cannot be made consistent with acceptable living conditions for nearby residents or*
 - d. the development of the site would secure an over-riding public benefit*
- B. Proposals for the redevelopment of community or educational facilities that secure enhanced re-provision on the site, or another site which improves accessibility will be supported.”*

Since the submission of the application, the applicant has submitted an additional statement, which sets out that the reason for the decline of the existing driving range is due in part to the ready availability of nearby competing facilities which function as part of much larger golf complexes. In any event, it is proposed that the existing 9 hole golf course would continue to function. The applicant has provided details of six other golf courses and driving ranges, all within 6.3km of the site which would be available to any displaced users at the application site. The other facilities within the vicinity are extensive and mostly function throughout the week. It is accepted that to emulate the nearby competing facilities, the range of facilities on offer at the application site would need to be significantly expanded. As such, it is considered that there would be no fundamental conflict with policy DM 47 and would be in conformity with the development plan.

6.3 Character and Appearance of the Area

- 6.3.1 National Planning Policy Framework (2012) advises at paragraph 58 that planning policies and decisions should aim to ensure that developments should optimise the potential of the site to accommodate development and respond to local character and history and reflect the identity of local surroundings and materials.
- 6.3.2 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 (2016) 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 (2016) 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. The need for high quality development is reiterated in policy D2 of the Draft London Plan (2017).
- 6.3.3 Core Policy CS(B) states 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.’
- 6.3.4 Policy DM 1 A of the Local Development Management Policies Local Plan (2013) states that: “*All development and change of use proposals must achieve a high standard of design and layout. Proposals which fail to achieve a high standard of design and layout, or which are detrimental to local character and appearance will be resisted*”. It goes on to say that: “*The assessment of the design and layout of proposals will have regard to:*
- a: the massing, bulk, scale and height of proposed buildings in relation to the location, the surroundings and any impact on neighbouring occupiers;*
 - b: the appearance of proposed buildings, including but not limited to architectural inspiration, detailing, roof form, materials and colour, entrances, windows and the discreet accommodation of external services;*
 - c: the context provided by neighbouring buildings and the local character and pattern of development;*
 - d: the provision of appropriate space around buildings for setting and landscaping, as a resource for occupiers and to secure privacy and amenity;*
 - e: the need to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit;”*
- 6.3.5 The site is located within the Harrow and Weald Ridge Area of Special Character which the Core Strategy identifies as being of strategic value in ‘providing a countryside backdrop to the suburban areas south of the Green Belt’.

- 6.3.6 The development is situated in an urban edge location on the periphery of the large built up urban area to the south east. There are small groups of residential properties located in reasonably close proximity to the north west along Wood Lane including a more recent residential development of 10 large detached houses at 'The Cloisters'. There are no specific policies which would preclude a residential use on this site. Moreover, the proposed use would occupy an existing building. As such, the proposed partial residential use is considered to be acceptable in character terms.
- 6.3.7 The proposal would utilize the existing main premises, with a modest size golf reception building and ancillary cycle and refuse store located adjacent to it. The overall significant reduction in the spread of the size of the development, together with the removal of the existing floodlights to the rear elevation of the premises and the 5m high wire fence/metal pylons to the perimeter of the driving range is considered to result in a significant improvement to the Green Belt setting and the Harrow Weald Ridge Area of Special Character.
- 6.3.8 As discussed above, there would be an infill to the north west elevation of the building which is currently open. However there would be substantial extension and alteration to its appearance, other the provision of a first floor balcony. It is proposed to use matching barn like materials which would help retain the rural character of the building. The proposed single storey reception building would be modest and would appear as a suitably subservient and well related addition and matching materials would also be utilized on this building. A planning condition is recommended to ensure that the proposed materials would match those used in the existing building to ensure the proposal would harmonise sufficiently within its Green Belt setting.
- 6.3.9 London Plan Policy 7.21 Trees and Woodland states that existing trees of value should be retained and that, wherever appropriate, additional trees should be planted in new development. Local Plan Policy DM22 Trees and Landscaping requires development proposals to include hard and soft landscaping and calls for retained trees to be protected during construction.
- 6.3.10 The proposal would not result in the loss of any significant soft landscape features. New planting is proposed to demarcate the proposed share rectangular communal amenity space. Additionally an area of 320sqm of hard standing would be removed to provide a new landscaped area to the front of the main premises. The details of the landscape scheme can be secured through a suitable condition as set out below.
- 6.3.11 Subject to the above conditions, it is considered that the proposed development would be acceptable in terms of character and appearance and would accord with the development plan policies outlined.

6.4 Residential Amenity and Accessibility

- 6.4.1 The NPPF requires sustainable development, and as part of this developments should aim to minimise adverse effects on the local environment, which includes neighbouring properties.

- 6.4.2 Policy 7.6B, subsection D, of The London Plan (2016) states that new buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.
- 6.4.3 London Plan Policy 3.5 Quality of Design and Housing Developments sets out several criteria for achieving good quality residential development. The policy aims to ensure that developments enhance the quality of local places and create homes that reflect the minimum space standards and are fit for purposes in other respects. 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.
- 6.4.4 Core Strategy Policy CS1 K requires a high standard of design and layout across all tenures within a development and consistent with the London Plan and its associated SPG.
- 6.4.5 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". The Council's Residential Design Guide supplementary planning document is also relevant.
- 6.4.6 With regard to privacy, policy DM 1D outlines that: "The assessment of privacy and amenity considerations will have regard to:
a. the prevailing character of privacy and amenity in the area and the need to make effective use of land;
b. the overlooking relationship between windows and outdoor spaces;
c. the distances between facing windows to habitable rooms and kitchens;"
- 6.4.7 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. It incorporates Government's nationally described space standard, adopted through the Minor Alterations to the London Plan (March 2016) which new dwellings are required to meet and outline considerations relating to size and layout of rooms in a dwelling, the 'approach', the 'home as a place of retreat', and climate change mitigation and adaptation. The nationally described space standard together with the other standards set out in the Mayor's Housing SPG (2016) are intended to ensure that all new homes are functional and fit for purpose and offer the potential to be occupied over time by households of all tenures.
- 6.4.8 The Nationally Described Space Standard sets out requirements for the Gross Internal (floor) area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms and

storage. 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 use of these residential unit GIA's as minima is also reiterated in Appendix 1 of the Residential Design Guide SPD.

6.4.9 The floor areas of each of the flats are provided in the table below:

Flat No.	Room	Proposed Floor Area (m ²)	Minimum Floor Area Required (m ²)
Ground floor north west flat (1b, 2p)	Bedroom 1	20	11.5
	Internal storage	1.5	1.5
	Total GIA	83.3	50
Ground floor south west flat (1b, 2p)	Bedroom 1	19.83	11.5
	Internal storage	5.85	1.5
	Total GIA	96.1	50
Ground floor north east flat (1b, 2p)	Bedroom 1	20.3	11.5
	Internal storage	1.5	1.5
	Total GIA	82.23	50
Ground floor south east flat (1b, 2p)	Bedroom 1	19.67	11.5
	Internal storage	6.26	1.5
	Total GIA	96.63	50
Ground Floor central rear flat (1b, 2p)	Bedroom 1	15.54	11.5
	Internal storage	3.84	1.5
	Total GIA	68.16	50
1st Floor north west flat (2b, 4p)	Bedroom 1	18.93	11.5
	Bedroom 2	14.33	11.5
	Internal Storage	3	2
	Total GIA	83	70
1st floor flat south west (1b, 3p)	Bedroom 1	17.94	11.5
	Store (potential second single bedroom)	7.5	10.2
	Internal Storage	16.95	2.0
	Total GIA	101.95	61
1st floor, north east flat (1b, 2p)	Bedroom 1	20.75	11.5
	Internal Storage	3.3	2
	Total GIA	89	50
1st floor south east flat (1b, 2p)	Bedroom 1	18.96	11.5
	Internal Storage	25.5	2
	Total GIA	101.3	50

6.4.10 Having regard to the above table, the proposed development conforms to the minimum space standards set out in the London Plan and the adopted Residential Design Guide SPD. It is noted that a large proportion of the units would exceed the standards. The development would also achieve the

minimum floor to ceiling height of 2.5 metres as required by the Housing SPG as demonstrated by the submitted sections.

Stacking

- 6.4.11 The Residential Design Guide SPD seeks to limit the transmission of noise between flats and specifies that 'the vertical stacking of rooms between flats should ensure that bedrooms do not overlap living rooms, kitchens and bathrooms on other floors. Where possible, the horizontal arrangement of rooms between flats in a block should also avoid bedrooms adjoining neighbouring living rooms, kitchens and bathrooms, as well as communal areas such as halls and stairs'. Both of these points are picked up by Policy DM1 Achieving a High Standard of Development which undertakes to assess amenity having regard to the adequacy of the internal layout in relation to the needs of future occupiers and, at paragraph 2.15 of the reasoned justification, echoes the SPG position on noise and internal layout.
- 6.4.12 Since the submission of the application, the applicant has submitted revised floor plans which show a modified internal layout at ground and first floor level. This has largely addressed the issue on the previous plan where bedrooms were sited over living rooms. As such, it is considered the vertical stacking of rooms is considered to be appropriate. It is noted that there are some minor overlaps with regard to the horizontal staking relationship in relation to the rear ground floor central flat where the bedroom would adjoin a living space. However, it is considered a refusal on this issue alone would not be justified in this case.

Amenity Space

- 6.4.13 The provision of a shared landscaped communal open area of 3692m² is considered to be sufficient to meet the needs of the future occupiers of the development and would maintain a spacious open setting from the proposal consistent with the surrounding pattern of development. Two of the flats at first floor levels would also benefit from access to a large balcony.

Dual Aspect and Privacy

- 6.4.14 It is noted that the flats would not all be dual aspect. Nevertheless they would all benefit from generous living spaces and access to attractive amenity space. It is noted that two of the one bedroom flats at first floor level would be served by 9 large rooflights of approximately 1 x 0.7 metres in size. These units would face south east and would therefore receive very good levels of daylight and sunlight. Due to the position of the rooflights on the sloping roof, as shown in the submitted section, they would still be provided with reasonable outlook. It is considered that the reduced outlook for two of the flats would also be offset to some extent by the setting of the building, the large amenity space at the rear and the good internal layout. Moreover, it is noted that the existing building already contains a residential flat for staff use at first floor level. A condition is recommended to ensure that all the rooflights are openable to ensure that the flats at first floor level would receive adequate levels of ventilation.

- 6.4.15 With regard to privacy, due to the locations and position of windows and distance from the retained golf course (as discussed below), it is considered that the future occupiers would receive acceptable levels of privacy. Furthermore, it is considered that any future occupiers are most likely to be interested in golf and would have expectations about the level of privacy afforded from such a development, than those choosing to live in more traditional suburban environments.

Refuse Provision

- 6.4.16 Policy DM45 of the Harrow DMPLP (2013) states that: "All proposals will be required to make on-site provisions for general waste, the separation of recyclable materials and the collection of organic material for composting. The on-site provisions must:
- a. provide satisfactory storage volume to meet the general recycling and organic waste material arising from the site;
 - b. ensure satisfactory access for collectors and, where relevant, collection vehicles; and
 - c. be located and screened to avoid nuisance to occupiers and adverse visual impact.
- 6.4.17 An open bin store for 28 x 240L bins would be provided adjacent to the northern flank elevation. This would be in a practical location for future residents and would ensure the refuse bins would be concealed from view. The proposed refuse arrangements are considered to be acceptable.

The Impact of the retained golf course on the future occupiers

- 6.4.18 It is considered that potential impacts on the proposed residents could arise from the continued use of the 9 hole golf course and car park.
- 6.4.19 The applicants outlines that the golf club would continue to function during daylight hours. During the summer months, the latest golfer would tee off on a 9 hole course is normally 730pm, with the earliest being 7am. However, following the removal of the driving bay wings the retained building will be some 70m from the nearest hole. There are no spectators on this particular course. Having regard to the nature of the sport which is quite game as well as the separation distance, it is considered that no undue noise and disturbance from golfers would affect the future occupiers of the flats.
- 6.4.20 It is accepted that the potential impact of stray balls is unlikely to be an issue as the nearest hole (No. 7), like all the other holes is relatively short at 110m and faces south east, whilst the nearest proposed dwelling would be some 180m distant and the rear elevation faces north west such that, in combination, this degree of separation and orientation would preclude any nuisance.
- 6.4.21 The retained golf course car park of 46 spaces will occupy the north east part of the existing car park. Consequently, these spaces are not adjacent to the proposed dwellings, the nearest space being 45m from the building, a sufficient

distance to preclude any undue impact. The applicant has advised that the car park will not be lit and neither will car headlights be an issue as the course will only be open only during daylight hours.

- 6.4.22 Overall, having regard to the quiet nature of golf and daylight hours of use, when combined with the degree of separation and orientation between the nearest hole and the proposed dwellings, it is considered that the continued use of the golf course will not unduly impact on the proposed occupants. A condition is recommended to ensure that the opening hours of the site are restricted in order to safeguard the residential amenities of the future occupiers.

Accessibility

- 6.4.23 Policy 3.8 of The London Plan (2016) requires that 90% of dwellings must comply with the requirements of Category M4(2) 'accessible and adaptable dwellings', broadly the equivalent of Lifetime Homes, and 10% of dwellings must comply with the standards of category M4 (3), 'wheelchair user dwellings.' However, the London Plan also stipulates that Part M of the Building Regulations does not apply to dwellings resulting from a conversion or a change of use. As such, it is considered that there would be no conflict with the development plan in this respect.
- 6.4.24 For the reasons outlined, the proposed future accommodation is considered to be acceptable and would comply with the above policies of the development plan.

6.5 Transport and Parking

- 6.5.1 Paragraph 32 of the NPPF states that decision should take account of whether
- The opportunities for sustainable transport modes have been taken up depending on the nature and the location of the site, to reduce the need for major transport infrastructure;
 - Safe and suitable access to the site can be achieved for all people; and
 - Improvements can be undertaken within the transport network that cost effectively limits the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of the development are severe.
- 6.5.2 London Plan policy 6.3 requires that development proposals should ensure that impacts on transport capacity and the transport network, at both corridor and local level are fully assessed.
- 6.5.3 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. This policy position is echoed in the new Draft London Plan (2017) under polices T4, T5, T6, and T6.1.

- 6.5.4 The Development Management Policies DPD gives local interpretation of London Plan parking standards and detail requirements for sustainable Travel Plans. The document refers to the maximum London Plan standards for the parking standards of vehicles (including those with vehicle charging points) and cycle parking spaces. In addition, there would be “1 motorcycle/ scooter parking space per 20 car parking spaces subject to all developments with more than 10 car parking spaces having a minimum of 1 space”.
- 6.5.5 Since the original application was submitted and following comments from the Council’s Highways department, the applicant has submitted a Transport Statement (TS). The statement has been prepared in accordance with the Department for Communities and Local Government Planning Practice Guidance on Travel Plans, Transport Assessments and Statement in Decision Making (2014).

Accessibility

- 6.5.6 With regard to walking access to the site, Brockley Hill has a footway to its western side so that it is possible southwards to Pipers Green Lane, where a footway is then present on both sides of the road and from which point it has street lighting.
- 6.5.7 The closest shops and services to the site are located at the junction of London Road/Brockley Hill at a distance of 0.9km. The TS outlines that a doctor’s surgery is located a distance of 1.2km away on London Road. Stanmore London Underground station is located a distance of 1.5km away. In addition, there is a pedestrian access gate to the Cleopatra Close Park from Brockley Hill at its junction with Pipers Green lane, a distance of approximately 300m from the application site.
- 6.5.8 The applicants Planning, Design and Access Statement notes that the 107 bus route runs along Brockley Hill with bus stops within 300m of the site access and that this has a regular service, with buses every 15 minutes Monday to Saturday and every 20 minutes on a Sunday during normal hours e.g. 7am to 8pm. The service runs from Edgware to New Barnet.
- 6.5.9 Stanmore Station provides a service on the Jubilee Line every 10 minutes. The service runs from Stanmore, its northern terminus to Stratford.
- 6.5.10 The application supporting documents notes that The Chartered Institution of Highways and Transportation’s ‘*Providing for journeys on Foot*’ outlines that the average length of a walk journey is 1km, with a preferred maximum walking distance of 2km for commuting/school journeys and 1.2km for other destinations. Officer note that the document is intended to provide best practice guidelines for pedestrians within the existing UK legislative framework.

6.5.11 Although the site is located within a low PTAL area of 1a, having regard to the above factors as well as the number of dwellings under consideration, it is considered that residents would have alternative options to travel to and from the site, other than the use of the private car.

Parking

6.5.12 The current golf club (driving range and 9 hole golf course) are provided with parking spaces for upto 90 vehicles. However the proposals see the removal of the driving range facility and would result in a total reduction in parking demand and the requirement for parking space associated with the operation of the retained 9 hole golf course.

6.5.13 The London Plan does not provide a specific parking standard for facilities such as golf clubs. The Transport Statement has used the existing TRICS database to examine golf clubs and driving range sites of similar characteristics to the existing permitted use to examine the overall daily parking accumulation and likely maximum demand for the site.

6.5.14 In respect of traffic generation for the existing site, the TA notes that there would be a maximum parking demand of some 93 spaces. In terms of the proposed use the parking demand would be 53 spaces. This would be based on 1 space for 1 employee required to be on site at anyone time, 43 spaces for the retained golf course 9 (as existing) and 9 spaces for the flats 9 (i.e. 1 space per flat).

6.5.15 Initially 74 spaces were proposed to be retained on the site of which 65 would be for the golf club and 9 for the residential use. Following concerns raised by the Highways Authority regarding the overprovision of parking proposed, the applicant has confirmed that the maximum number of parking spaces on the site will be reduced to 60, 46 spaces for the golf course and 14 car parking spaces for the nine dwellings (i.e. 1.5 spaces per dwelling inclusive of disabled bays).

6.5.16 The parking accumulation exercise undertaken as part of the TS demonstrates that comparative 9 hole courses would typically require a maximum parking provision of upto 46 spaces. There are no changing facilities at this particular site, so ensuring participant turnover is quick, generating the need for fewer car parking spaces compared to a conventional course.

6.5.17 The London Plan (2016) parking standards states that "*In outer London areas with low PTAL (generally 0-1), boroughs should consider higher levels of provision, especially to address overspill parking pressures*". The proposed residential parking spaces at 14, although higher than standards set out in the London Plan (2016), are considered to be justified in this case having regard to the sites PTAL rating and noting that levels of car ownership are relatively high across the wider area, as noted in the TS. Furthermore, the TS demonstrate that the level of traffic generation would be significantly reduced on the site as a result of the proposal. A total of 3 parking spaces would be accessible parking

spaces. In addition, 40% or 6 spaces would be within lead length of an electric vehicle charging point. These aspects of the proposal can be secured by planning condition, should approval be granted.

Impact on Highway Network

- 6.5.18 The TA concludes that the existing use on site has the potential to generate 20-58 two way vehicle trips over a typical weekday period and peaks of upto 147 vehicle trips on Saturday and 71 on Sunday. The report outlines that the retained 9 hole golf course and proposed residential development of 9 flats could result in a slight reduction in trips in the AM peak and in the order of 37 fewer trips in the PM peak with a significant reduction in the overall daily traffic movements associated with the site. Following the same principle, it can also be accepted that the proposed development would result in a notable reduction in weekend vehicle movements associated with the site when visits to the driving range would typically be greater.
- 6.5.19 Overall, the anticipated number of vehicle movements is considered to be minimal and would therefore not have a detrimental impact on the operation of the existing highway network with regards to amenity, capacity and safety. The application has been referred to the Council Highways Authority who has raised no objection to the proposal in terms of parking provision or impact on the highway network.
- 6.5.20 Based on the London Plan (2016) cycle parking standards, one cycle space per dwelling is provided in the form of a cycle store located to the front of the building. A total of 11 parking spaces can be accommodated within the store. A condition is recommended to secure the level of cycle parking on the site. A further condition is also recommended to secure a Travel Plan statement to encourage access to the site by non car modes.
- 6.5.21 In view of the sustainable transport options identified, the number of units under consideration, the sites location and on the basis of the evidence within the submitted Transport Statement it is considered that the transport impacts of the proposal are acceptable, having regard to the aims and objectives of above stated policies.

6.6 Flood Risk and Drainage

- 6.6.1 The Local Plan designates part of the site located beyond the north west elevation as within flood zone 3a/3b area meaning that it is susceptible to flooding from surface water.
- 6.6.2 Paragraph 103 of the NPPF states that, when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere.
- 6.6.3 Core Strategy Policy CS1 U undertakes to manage development to achieve an overall reduction in flood risk and increased resilience to flood events.

- 6.6.4 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 DM 10 of the local plan and policy SI13 of the Draft London Plan (2017).
- 6.6.5 Policy DM9 requires that proposals must demonstrate that the development will be resistant and resilient to all relevant sources of flooding including surface water. Development proposals must minimise the risk of flooding on site and not increase the risk of flooding elsewhere, wherever possible reduce flood risks overall and ensure a dry means of escape for occupiers of residential development.
- 6.6.6 Local Plan Policy DM10 (On site surface water management and surface water attenuation) states that:
'A. Proposals for new development will be required to make provision for the installation and management of measures for the efficient use of mains water and for the control and reduction of surface water run-off. Substantial weight will be afforded to the target for mains water consumption of 105 litres or less per person per day and to the achievement of greenfield run off rates.
Where greenfield run- off rates cannot be achieved this should be clearly justified by the applicant; however the fact that a site is previously developed and has an existing high run-off rate will not constitute justification.
B. The design and layout of major development proposals will be required to:
a. use appropriate sustainable drainage measures to control the rate and volume of surface water run-off;
b. ensure separation of surface and foul water systems;
c. make reasonable provision for the safe storage and passage of flood water in excessive events; and
d. demonstrate adequate arrangements for the management'.
- 6.6.7 The NPPF Practice guide clarifies that "the sequential test does not need to be applied for individual developments on sites which have been allocated in development plans through the sequential test, or for applications for minor development or change of use...Nor should it normally be necessary to apply the Sequential Test to development proposal in flood zone 1(land with a low probability of flooding from rivers or seas)".
- 6.6.8 The application is accompanied by an FRA which notes that there is a risk from surface water flooding which is collecting in a small area rather than flowing, due in part to the blockage of natural flow paths by the clubhouse itself.
- 6.6.9 As a change of use is proposed, the application floor level cannot be raised 300mm above predicted surface water flood levels. As such, the applicant proposes to adopt surface water flood mitigation. Additionally surface water flooding can be further ameliorated by landscaping part of the proposed communal landscape area and its north western boundary adjacent to the retained golf course.
- 6.6.10 The proposed mitigation includes a permeable paving with surface levels set 300mm below finished floor levels and the base of a formation layer set to circa

650mm below finished floor level. This will enable surface water to permeate through the sub base which will maintain the ponding depth to that 'at risk area'. In addition other flood resistance and resilience measures will be incorporated in to the building as part of the conversion, including floor resilient doors, anti-flood air bricks and retro fitting back flow sewage valves to the foul drainage system where feasible. A condition is recommend to ensure that the proposed flood resistance and resilience measures are incorporated in to the building.

- 6.6.11 The existing access and egress route is located outside of the flood risk area and so provides a safe means of access and egress. Details of a flood plan can be secured by condition.
- 6.6.12 Other hydraulic control measures are proposed including the provision of storm attenuation cells and hydrobrakes to be submitted and approved in writing by the LPA.
- 6.6.13 As can be seen from the above consultation response the Drainage Authority do not object to the proposal, subject to the detailed drainage design, including regarding and bio retention details being approved by the local planning authority prior to occupation. As such, based on the above proposals, including the proposed landscaping, the flood resistance and resilience measures, the proposed flood plan and the proposed attenuation and hydraulic control measures, which can all be secure by planning condition, the proposal would be acceptable in flood risk terms.

6.7 Impacts on Trees and Biodiversity

- 6.7.1 London Plan Policy 7.21 Trees and Woodland states that existing trees of value should be retained and that, wherever appropriate, additional trees should be planted in new development. This is echoed in policy G7 of the Draft London Plan (2017). Local Plan Policy DM22 Trees and Landscaping requires development proposals to include hard and soft landscaping and calls for retained trees to be protected during construction.
- 6.7.2 By inference, the NPPF emphasises that one of the best ways to conserve the natural environment is to encourage the effective use of land by re-using previously-developed land to meet development needs¹⁶¹. At paragraph 118 the NPPF sets out the principles for conserving and enhancing biodiversity, which include resisting development that would: (i) cause significant harm that cannot be avoided, mitigated or compensated-for; or (ii) have an adverse effect on a Site of Special Scientific Interest (SSSI). Opportunities to incorporate biodiversity in and around developments are encouraged.
- 6.7.3 London Plan Policy 7.19 Biodiversity and Access to Nature echoes the need for development proposals to make a positive contribution to biodiversity, to protect statutory sites, species and habitats, and to help achieve Biodiversity Action Plan targets.
- 6.7.4 The Harrow Biodiversity Action Plan (2015 – 2020) defines Sites of Importance for Nature Conservation (SINCs) as 'greenspaces considered important for

nature conservation due to the habitats and species they support.’ Local Plan Policy DM 20: Protection of Biodiversity and Access to Nature, states that ‘Proposals that would be detrimental to locally important biodiversity or that would increase local deficiencies in access to nature will be resisted.’

- 6.7.5 The site is located adjacent to a large designated site of importance for nature conservation. The application is accompanied by an Ecology report and indicative landscape proposals.
- 6.7.6 Overall, the ecology report found that whilst there is habitat suitable for protected species on site is generally considered to be of poor value. The proposal would result in the loss of some amenity grassland and ornamental planting. The existing building has also been confirmed as a bat roost of a single Soprano Pipitrelle. However, the proposals involve changes that will provide more diverse habitats on site (including planting native species in landscaped areas) as well as drastic positive changes in habitat management of the overall footprint of the site. With regard to any protected bats using the building, the report sets out a suitable mitigation strategy to ensure that there would be no loss of habitat.
- 6.7.7 Other habitat enhancement proposed includes nesting bird boxes which will be incorporated into the converted building to support nationally declining bird species such as House Sparrow and Starling. Furthermore additional bat roasting features and invertebrate habitat will be built into the development. Subject to a condition to ensure that the development is carried out in accordance with the recommendations of the ecology report, including habitat enhancement, it is considered that overall the proposal would result in a positive impact for biodiversity and would accord with the development plan

6.8 Sustainability

- 6.8.1 Paragraphs 96-98 of the NPPF relate to decentralised energy, renewable and low carbon energy. Chapter 5 of the London Plan (2016) contains a set of policies that require developments to make the fullest contribution to the mitigation of, and adaption to, climate change and to minimise carbon dioxide emissions. Specifically, policy 5.2 sets out an energy hierarchy for assessing applications, as set out below:
- Be lean: use less energy***
Be clean: supply energy efficiently
Be green: use renewable energy
- 6.8.2 Policy 5.3 seeks to ensure that future developments meet the highest standards of sustainable design and construction. Policy 5.4 (Retrofitting) requires that programmes should be in place to bring existing buildings up to the Mayors standards on sustainable design and construction. The be lean, be clean, be green energy approach is reiterated in policy S12 of The London Plan (2017).
- 6.8.3 Policy DM 12 of the Harrow Development Management Policies Local Plan seeks to ensure that the design and layout of development proposals are sustainable. Its states that development will need to “utilise natural systems

such as passive solar design and, wherever possible incorporate high performing energy retention materials”...”Proposals should make provision for natural ventilation and shading to prevent internal overheating and incorporate techniques that enhance biodiversity”. Policy DM 14 highlights that development proposals should incorporate renewable energy technology where feasible.

6.8.4 There is no specific energy reduction target for minor development proposals set out in The London Plan.

6.8.5 As the proposal seeks to re-use and existing building, it would have a limited environmental impact. Moreover, the ecological and environmental value of the site would be enhanced through additional landscaping and drainage control. No detailed sustainability improvements for the existing building have been put forward by the applicant. Officers consider that there may be opportunities to reduce carbon dioxide emissions and improve the efficiency of resource, such as water. As such, a planning condition is recommended to secure a sustainability statement for the development setting out environmental improvements to the building itself which can be incorporated in to the conversion. Subject to this condition, it is considered that the thrust of the policy objectives would be met for this development.

6.9 Archaeology

6.9.1 Paragraph 129 of the NPPF states that ‘local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise’.

6.9.2 Policy CS1 of the Core Strategy states that ‘proposals that would harm the significance of heritage assets including their setting will be resisted.

6.9.3 Policy DM 7 of the Harrow Development Management Policies Local Plan (2013) outlines that “*Proposals that secure the preservation, conservation or enhancement of heritage assets and its setting or which secure opportunities for sustainable enjoyment will be approved*”.

6.9.4 An Archaeological Priority area lies to the north east of the application site between the part of the car park and Brockley Hill. Accordingly The Greater London Archaeological Advisory Service were consulted on the application. As noted from their consultation response, the proposal is unlikely to have a significant effect on heritage assets of archaeological interest and therefore no further assessment or conditions have been recommended in this instance. As such, the development would be acceptable in this regard.

6.10 Regeneration

6.10.1 The proposed 9 flats would make a modest contribution to the boroughs housing targets. There would be benefits arising from the short term

construction of the proposed development and future occupiers would support the local economy

6.11 Equalities Implications

6.11.1 Section 149 of the Equalities Act 2010 places obligations on local authorities with regard to equalities in decision making. It is considered that this application does not raise any equality implications or conflict with development plan policies in this regard.

6.12 Crime and Disorder Act

6.12.1 It is considered that the proposed development would not adversely impact upon community safety issues or conflict with development plan policies in this regard.

7.0 CONCLUSION AND REASONS FOR APPROVAL

7.1 The proposed change of use of the existing golf driving range building and its re-use for residential purposes, together with the associated landscape works, is considered to be appropriate development within the context of paragraph 90 of the NPPF (2012). Moreover, the proposed golf reception building, refuse compound and cycle store are considered to be appropriate development when considered within the context of bullets points 2 and 6 of paragraph 89 of the NPPF (2012). Overall, it is considered that the development would not be detrimental to the openness, purposes and visual amenities of the Green Belt.

7.2 The existing golf course would be retained as part of the proposals and having considered alternative nearby facilities on offer, it is considered that there would be no fundamental conflict with policy DM 47 in respect of the loss of community and sports facilities.

7.3 The overall significant reduction in the spread of the size of the development, together with the removal of the existing floodlights to the rear elevation of the premises and the 5m high wire fence/metal pylons to the perimeter of the driving range is considered to result in a significant improvement to the Green Belt setting and the Harrow Weald Ridge Area of Special Character. It is proposed to use matching barn like materials which would help retain the rural character of the building. The proposed single storey reception building would be modest and would appear as a suitably subservient and well related addition and matching materials would also be utilized on this building.

7.4 All the residential units would benefit from generous living spaces and access to attractive amenity space. Having regard to the quiet nature of golf and daylight hours of use, when combined with the degree of separation and orientation between the nearest hole and the proposed dwellings, it is considered that the continued use of the gold course will not unduly impact on the proposed occupants.

- 7.5 In view of the sustainable transport options identified, the number of units under consideration, the sites location and on the basis of the evidence within the submitted Transport Statement it is considered that the transport impacts of the proposal are acceptable, having regard to the aims and objectives of the development plan.
- 7.6 Through proposed landscaping, the incorporation of flood resistance and resilience measures into the development, the proposed flood plan and the proposed attenuation and hydraulic control measures, which can all be secure by planning condition, the proposal would be acceptable in flood risk terms.
- 7.7 Furthermore, subject to a condition to ensure that the development is carried out in accordance with the recommendations of the ecology report, including habitat enhancement, it is considered that overall the proposal would result in a positive impact for biodiversity.

APPENDIX 1: CONDITIONS AND INFORMATIVES

CONDITIONS

General Planning Conditions

1 Timing

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

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

2 Approved Drawing and Documents

The development hereby permitted shall be carried out, completed and retained in accordance with the following approved plans and documents: Site Plan – Tree Planting and S.W. Attenuation Storage; Transport Planning Statement by Milestone Transport Planning (dated September 2017); Document titled: Further Response to Council's Emails 10th and 11th August 2017 (DLA Ref: 08/067, dated September 2017); Document titled: Response to Council's Email: 13th July 2017 (DLA Ref: 08/067, dated August 2017); Document titled: Further Response to Council's Emails 13th and 17th October 2017 (DLA Ref: 08/067, dated November 2017); 568 1 D (Existing Plans); 568 8 A (Existing Levels); 568 9 A (Sections); 568 4 E (Proposed Plans); 568 7 Rev B (Proposed Plans); 568 6 D (Proposed Elevations); 568 5 B (Proposed Plans); Flood Risk Assessment and Surface Water Strategy Report dated October 2017) by Innervision Design; 568 2 (Existing Plans); 568 3 (Existing Elevations); Ecological Assessment, September 2017 Revision 02 by Turnstone Ecology; Planning, Design & Access Statement (dated March 2017)

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

Pre Commencement Planning Conditions

3 Surface Water 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 and ground re grading and bio retention details have been submitted to, the Local Planning Authority in writing to be agreed. The submitted details shall also include measures to prevent water pollution and details of SuDS and their management and maintenance and a management plan for the disposal of ground water during the construction phase. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

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

drainage measures are exploited, in accordance with London Policies 5.13 & 5.15 of the London Plan (2016) and built-in to the Policy DM 10 of the Harrow Development Management Policies Local Plan (2013). To ensure that measures are agreed and development to manage and reduce surface water run-off. This condition is a PRE-COMMENCEMENT condition.

4 Foul Surface Water Drainage Strategy

No development shall take place, other than works of demolition, until a foul water drainage strategy, has been submitted to the Local Planning Authority in writing to be agreed. The development shall not be occupied until the agreed drainage strategy has been implemented.

Reason: To ensure that there would be adequate infrastructure in place for the disposal of foul water arising from the development, in accordance with Policy 5.14 of the London Plan (2016) and Harrow Core Strategy Policy CS1, and to ensure that the development would be resistant and resilient to foul water flooding in accordance with Policy DM 10 of the Harrow Development Management Policies Local Plan (2013). To ensure that measures are agreed and put in place to dispose of foul water arising from the development. This condition is a PRE-COMMENCEMENT condition.

5 Hard and Soft Landscaping

The development hereby approved shall not be occupied until a scheme for the hard and soft landscaping of the development, to include details of the planting, hard surfacing materials, raised planters, external seating and boundary treatment has been submitted to the Local Planning Authority in writing to be agreed. 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/corridors, and communal garden/open space areas. The scheme shall also include proposed finished levels, means of enclosure circulation areas, minor artefacts and structures (such as play equipment, furniture, temporary refuse storage area and signs). 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 in accordance with policy 7.4B of The London Plan (2016), policy CS.1B of the Harrow Core Strategy (2012) and policies DM 1 and DM 22 of the Harrow Development Management Policies Local Plan (2013). To ensure that measures are agreed and development to manage and reduce surface water

run-off. This condition is a PRE-COMMENCEMENT condition.

6 Ecological Enhancements

The development hereby approved shall not commence until details of ecological enhancement measures within the site in accordance with the recommendations of the Ecological Assessment, September 2017 Revision 02 by Turnstone Ecology have been submitted to the Local Planning Authority in writing to be agreed. The proposals shall include details for increasing the availability of bird nesting places, bat boxes and invertebrate habitat within the site. Bird nesting places shall cater for bird species identified in Table 6 of the Harrow Biodiversity Action Plan 2015-2020. The development shall be carried out in accordance with the proposals so agreed and shall be retained as such thereafter.

Reason: To ensure that the development makes appropriate provision for the protection, enhancement, creation and management of biodiversity within the site and surrounding area in accordance with Policy 7.19 of The London Plan (2016) and Policy DM 22 of the Harrow Development Management Policies Local Plan (2013). To ensure that measures are agreed and can be incorporated into the development during construction. This condition is a PRE-COMMENCEMENT condition.

7 Energy and Sustainability

Prior to the commencement of development hereby permitted, a Sustainability Statement and Energy Strategy shall be submitted to the Local Planning Authority in writing to be agreed. The development shall be undertaken in accordance with the approved details and thereafter retained.

Reason: To ensure the delivery of a sustainable development in accordance with the National Planning Policy Framework 2012, policies 5.2.B/C/D/E of The London Plan (2016) and policies DM 12, DM 13 and DM 14 of the Harrow Development Management Policies Local Plan. To ensure that measures are agreed and can be incorporated into the development during construction. This condition is a PRE-COMMENCEMENT condition.

8 Contamination

Prior to the commencement of the development, an Environmental Risk Assessment Report shall be submitted to the Local Planning Authority in writing to be agreed. The report must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The report of the findings must include:

(i) a survey of the extent, scale and nature of contamination;

(ii) an assessment of the potential risks to:

human health, property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,

adjoining land, groundwaters and surface waters, ecological systems, archeological sites and ancient monuments;

(b) The results of the site investigation and detailed risk assessment referred to in (a) and based on these, if required an options appraisal and remediation strategy giving full details of the remediation measures required and how these will be undertaken.

(c) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (b) are complete and identifying any requirements for longer term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Unless otherwise agreed in writing with the local planning authority, the development shall be carried out as approved.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite in accordance with policy 5.21 of The London Plan (2016) and policy DM 15 of the Harrow Development Management Policies Local Plan (2013). To ensure that the development would not pose a risk to future occupiers of the site. This condition is a PRE-COMMENCEMENT condition.

9 Electric Vehicle Charger Parking

Prior to the commencement of the development, details of the electric vehicle charger point/s for the proposed development in accordance with London Plan Standards 2016, shall be submitted to and approved in writing by The Local Planning Authority. The electric vehicle charger point/s shall be implemented on site prior to occupation of the development in accordance with the approved details and shall be retained thereafter.

REASON: In the interests of sustainable transport in accordance with policy 5.8 and 6.13 of The London Plan (2016).

Pre-Occupation Conditions

10 Travel Plan Statement

The development shall not be occupied until a Travel Plan Statement has been submitted to the Local Planning Authority in writing to be agreed. ii) No part of the development shall be occupied prior to implementation of the Approved Travel Plan [or implementation of those parts identified in the Approved Travel Plan as capable of being implemented prior to occupation]. Those parts of the Approved Travel Plan that are identified therein as being capable of implementation after occupation shall be implemented in accordance with the details therein and shall continue to be implemented as long as any part of the development is occupied. iii) The records of implementation shall be made available to the Local Planning Authority at anytime upon request.

REASON: To promote sustainable transport and reduce the impact of the development on the surrounding road network in accordance with London Plan policies 6.1 and 6.3 and policy DM 42 of the Harrow Development Management

Polices Local Plan (2013).

11 Cycle Parking

Prior to the occupation of the development, the secure cycle parking spaces with provision for a minimum of 11 spaces for the proposed development shall be implemented in accordance with the approved details and shall be retained thereafter.

Reason: To ensure the satisfactory provision of safe cycle storage facilities, to provide facilities for all the users of the site and in the interests of highway safety and sustainable transport, in accordance with policy 6.9B of The London Plan 2016 and policy DM 42 of the Harrow Development Management Policies Local Plan (2013).

12 Removal of 5m fence and Pylons

Prior to the occupation of the development hereby permitted, all existing 5m high pylons and metal fences shall be completely removed from the site within the ownership of the applicant .

Reason: To enhance the character and the appearance of the locality and green belt in accordance with Policies DM 1 and DM 16 of the Harrow Development Management Polices Local Plan (2013).

Operational Conditions

13 Materials to Match

The materials to be used in the construction of the external surfaces of the external alterations and new buildings hereby permitted shall match those used in the existing building.

Reason: To match the appearance of the existing building and to safeguard the appearance of the locality and green belt in accordance with Policies 7.6 and 7.7 of the London Plan (2016) and Policies DM 1 and DM 16 of the Harrow Development Management Polices Local Plan (2013).

14 Implementation of Hard and Soft Landscaping

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

unless the local authority agrees any variation in writing.

Reason: To ensure that the development makes provision for hard and soft landscaping which contributes (i) to the creation of a high quality, accessible, safe and attractive public realm and (ii) to the enhancement, creation and management of biodiversity with the Heart of Harrow, in accordance with Policy DM22 of the Local Plan (2013), and to ensure a high standard of design, layout and amenity in accordance with Policy DM1 of the Local Plan.

15 Flood Risk

The development hereby permitted shall be undertaken in accordance with the details of the Flood Risk Assessment and Surface Water Strategy Report dated October 2017 by Innervision Design. This shall include that flood resistance and resilience measures are built into the conversion and that a Flood Evacuation Plan is produced. The Flood Evacuation Plan shall be provided to all future residents of the flats prior to occupation. The development shall be retained as such thereafter.

Reason: To prevent the increased risk of flooding, in accordance with the National Planning Policy Framework policies 5.12, 5.13 and 5.14, policy CS1 U of the Harrow Core Strategy and policy DM 9 and DM 10 of The Harrow Development Management Policies Local Plan (2013).

16 Refuse Bins

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

Reason: To safeguard the appearance and character of the surrounding area, in accordance with policy 7.4.B of The London Plan 2016 and ensure a high standard of residential quality in accordance with Policies DM 1 and DM 45 of the Harrow Development Management Policies Local Plan (2013).

17 Parking

The development hereby approved shall retain a maximum of 60 parking spaces on the application site of which 14 would be for residential use and 46 for the golf course, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To promote sustainable transport and reduce the impact of the development on the surrounding road network in accordance with London Plan policies 6.1 and 6.3 and policy DM 42 of the Harrow Development Management Policies Local Plan (2013).

18 Opening Hours

The retained golf course shall not be open to customers outside the hours of 8am to 10pm Monday to Sunday inclusive.

Reason: To safeguard the residential amenities of the occupiers of the site in accordance with policy DM 1 of the Harrow Development Management Policies Local Plan (2013).

19 Rooflights

The rooflights serving the first floor flats shall be openable rooflights and shall be retained as such.

Reason: To ensure an acceptable standard of accommodation for the future occupiers of the flats in accordance with policy DM 1 of the Harrow Development Management Policies Local Plan (2013).

Informatives

1 **Policies**

The following policies are relevant to this decision:

National Planning Policy:

National Planning Policy Framework (2012)

The London Plan (2016):

- 3.1 Ensuring equal life chances for all
- 3.2 Improving health and addressing health inequalities
- 3.5 Quality and Design of Housing Developments
- 3.8 Housing Choice
- 3.16 Protection and Enhancement of Social Infrastructure
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable design and construction
- 5.7 Renewable energy
- 5.10 Urban Greening
- 5.12 Flood Risk Management
- 5.13 Sustainable Drainage
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.11 Smoothing traffic flow and tackling congestion
- 6.13 Parking
- 7.1 Building London's neighbourhoods and communities
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.6 Architecture
- 7.8 Heritage Assets and Archaeology
- 7.16 Green Belt
- 7.19 Biodiversity and access to nature
- 7.21 Trees and Woodlands

The Draft London Plan (2017):

- Policy D1 London's form and characteristics
- Policy D2 Delivering Good Design
- Policy D3 Inclusive design
- Policy D4 Housing Quality and Standards
- Policy D5 Accessible Housing
- Policy H2 Small Sites
- Policy H6 Threshold Approach to Applications
- Policy H12 Housing Size Mix
- Policy S5 Sports and Recreation Facilities
- Policy G2 London's Green Belt
- Policy G6 Biodiversity and Access to Nature
- Policy SI2 Minimising Greenhouse Gas Emissions

Policy SI12 Flood Risk management
Policy SI13 Sustainable Drainage
Policy T3 Transport Capacity, Connectivity and Safeguarding
Policy T4 Assessing and mitigating Transport Impacts
Policy T5 Cycling
Policy T6 Car Parking
Policy T6.1 Residential Parking

Harrow Core Strategy (2012)

CS1: Overarching Principles

Harrow Development Management Policies Local Plan (2013):

Policy DM 1 Achieving a High Standard of Development
Policy DM 2 Achieving Lifetime Neighbourhoods
Policy DM 6 Areas of Special Character
Policy DM 7 Heritage Assets
Policy DM 9 Managing Flood Risk
Policy DM 10 On Site Water Management and Surface Water Attenuation
Policy DM 12 Sustainable Design and Layout
Policy DM 13 Decentralized Energy Systems
Policy DM 14 Renewable Energy
Policy DM 16 Maintaining the Openness of the Green Belt and Metropolitan Open Land
Policy DM 17 Beneficial Use of Green Belt and Metropolitan Open Land
Policy DM 20 Protection of Biodiversity and Access to Nature
Policy DM 21 Enhancement of Biodiversity and Access to Nature
Policy DM 22 Trees and Landscaping
Policy DM 29 Sheltered Housing, Care Homes and Extra Care Housing
Policy DM 42 Parking Standards
Policy DM 43 Transport Assessments and Travel Plans
Policy DM44 Servicing
Policy DM 45 Waste Management
Policy DM 47 Existing Community Sport and Educational Facilities

Other Relevant Guidance:

Supplementary Planning Document Sustainable Building Design (2009)
Supplementary Planning Document – Planning Obligations (2013)
Mayor of London, Housing Supplementary Planning Guidance (2016)
Code of Practice for Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (2016)

2 Pre-application engagement

Statement under Article 35(2) of The Town and Country Planning (Development Management Procedures) (England) Order 2015. This decision has been taken in accordance with paragraphs 187-189 of The National Planning Policy Framework. Harrow Council has a pre-application advice service and actively encourages applicants to use this service. Please note this for future reference prior to submitting any future planning applications.

3 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 Portal website:
<https://www.gov.uk/party-wall-etc-act-1996-guidance>

4 Protection of Highway

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

5 Considerate Contractor Code of Practice

The applicant's attention is drawn to the requirements in the Considerate Contractor Code of Practice. In the interests of minimising any adverse effects arising from building operations, the limitations on hours of working are as follows:
0800-1800 hours Monday - Friday (not including Bank Holidays)
0800-1300 hours Saturday

6 Mayor of London CIL Liability

Please be advised that approval of this application, (by PINS if allowed on Appeal following the Refusal by Harrow Council), attracts a liability payment of £39690 of Community Infrastructure Levy. This charge has been levied under Greater London Authority CIL charging schedule and s211 of the Planning Act 2008.

Harrow Council as CIL collecting authority on commencement of development will be collecting the Mayoral Community Infrastructure Levy (CIL).

Your proposal is subject to a CIL Liability Notice indicating a levy of £39690 for the application, based on the levy rate for Harrow of £35/sqm and the stated floor space of 1134sqm

You are advised to visit the planning portal website where you can download the appropriate document templates.

<http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil>

7 Harrow Community Infrastructure Levy

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

Harrow's Charges are:

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

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

Retail (Use Class A1), Financial & Professional Services (Use Class A2), Restaurants and Cafes (Use Class A3) Drinking Establishments (Use Class A4)

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

All other uses - Nil.

The Harrow CIL Liability for this development is: £124, 740

8 Surface Water Drainage Management

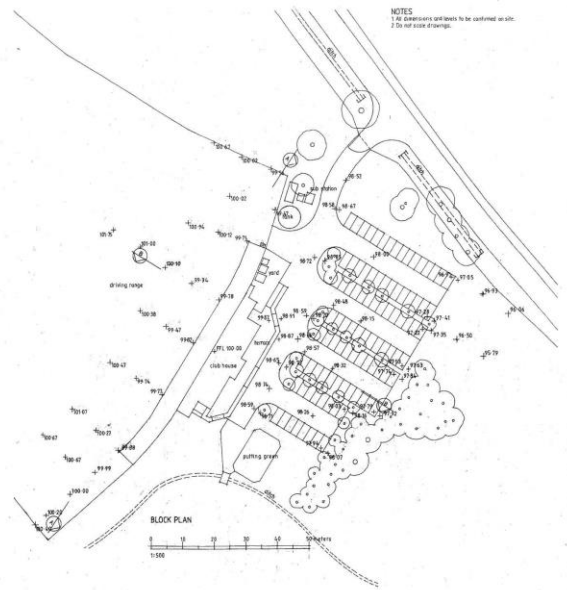
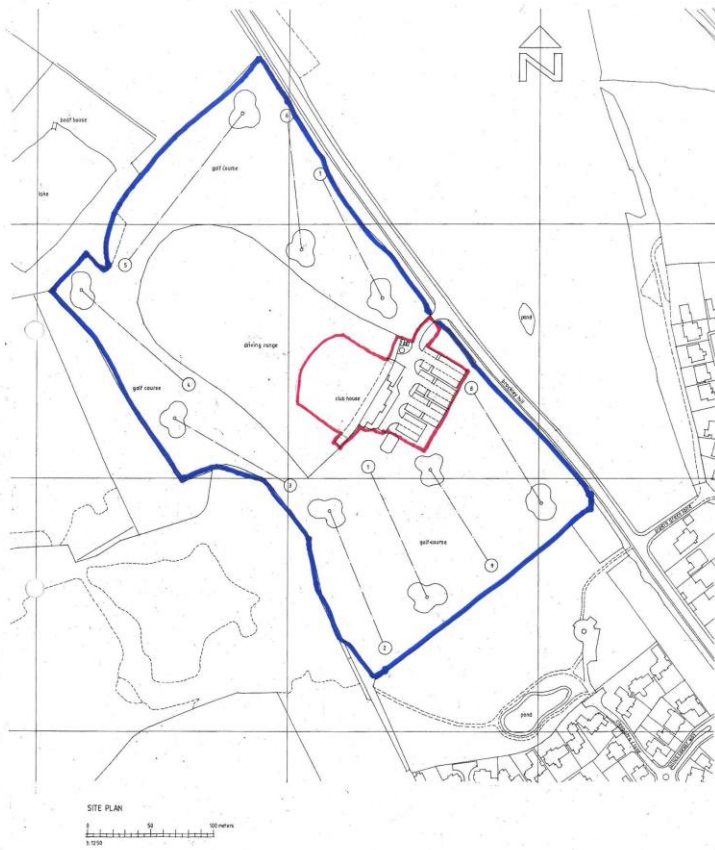
SUDS Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SUDS). SUDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SUDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SUDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity. Where the intention is to use soakaways they should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365.

Support for the SUDS approach to managing surface water run-off is set out in the National Planning Policy Framework (NPPF) and its accompanying technical guidance, as well as the London Plan. Specifically, the NPPF (2012) gives priority to the use of sustainable drainage systems in the management of residual flood risk and the technical guidance confirms that the use of such systems is a policy aim in all flood zones. Policy 5.13 of the London Plan (2016) requires development to utilise sustainable drainage systems unless there are practical reasons for not doing so. Sustainable drainage systems cover the whole range of sustainable approaches to surface drainage management. They are designed to control surface water run-off close to where it falls and mimic natural drainage as closely as possible. Therefore, almost any development should be able to include a sustainable drainage scheme based on these principles.

The applicant can contact Harrow Drainage Section for further information.

Plans Numbers : Site Plan – Tree Planting and S.W. Attenuation Storage; Transport Planning Statement by Milestone Transport Planning (dated September 2017); Document titled: Further Response to Council’s Emails 10th and 11th August 2017 (DLA Ref: 08/067, dated September 2017); Document titled: Response to Council’s Email: 13th July 2017 (DLA Ref: 08/067, dated August 2017); Document titled: Further Response to Council’s Emails 13th and 17th October 2017 (DLA Ref: 08/067, dated November 2017); 568 1 D (Existing Plans); 568 8 A (Existing Levels); 568 9 A (Sections); 568 4 E (Proposed Plans); 568 7 Rev B (Proposed Plans); 568 6 D (Proposed Elevations); 568 5 B (Proposed Plans); Flood Risk Assessment and Surface Water Strategy Report 0dated October 2017) by Innervision Design; 568 2 (Existing Plans); 568 3 (Existing Elevations); Ecological Assessment, September 2017 Revision 02 by Turnstone Ecology; Planning, Design & Access Statement (dated March 2017)

APPENDIX 2: SITE PLAN



NOTES
 1 All dimensions and levels to be confirmed on site.
 2 Do not scale drawings.

S	25.10.2017	Additional works added
C	1.1.2017	Revised plan
R	25.8.2017	Levels added
R	16.8.2017	Revised site plan
ARCHITECTS ASSOCIATES 7 ABERCROMBIE WAY STANMORE, MIDDLESEX 020 8423 1866		
client STANMORE AND EDGWARE GOLF CENTRE BROCKLEY HILL STANMORE MIDDLESEX		
1:100 1:500 20th 2017		EXISTING PLANS 568 1 1:0

APPENDIX 3: SITE PHOTOS



Rear Elevation



Front Elevation

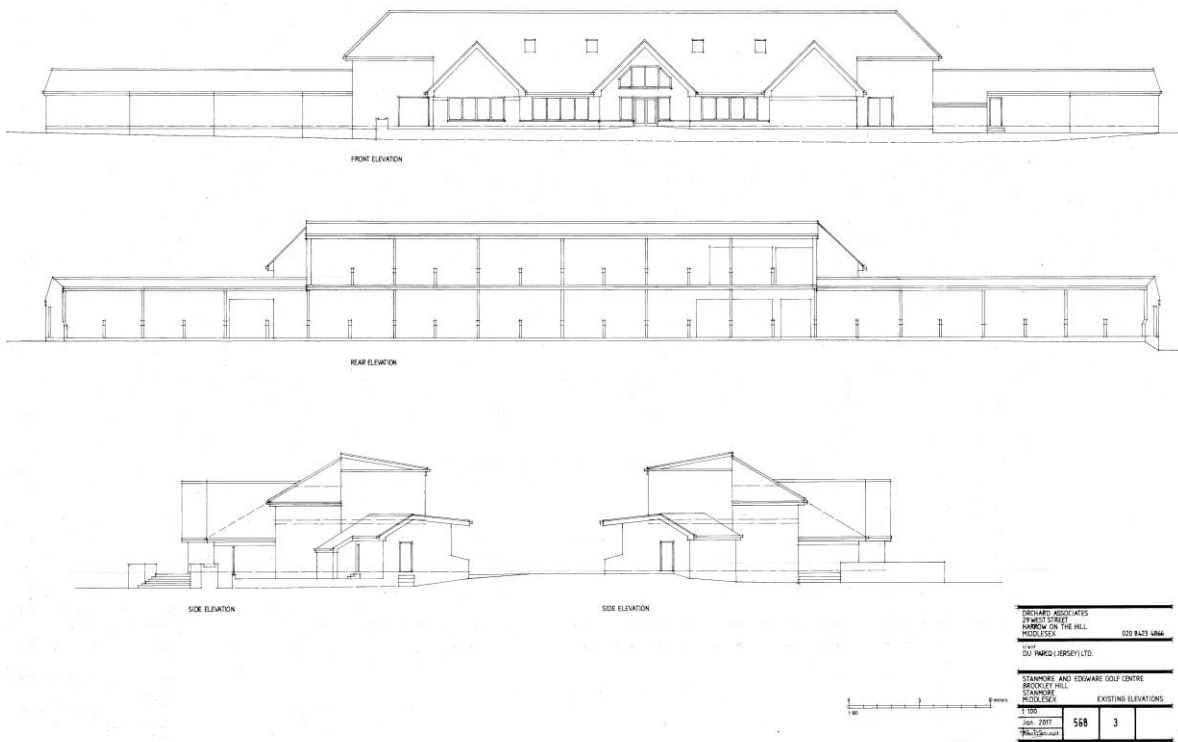


Car Park



Rear elevation and driving range bays with metal pylons

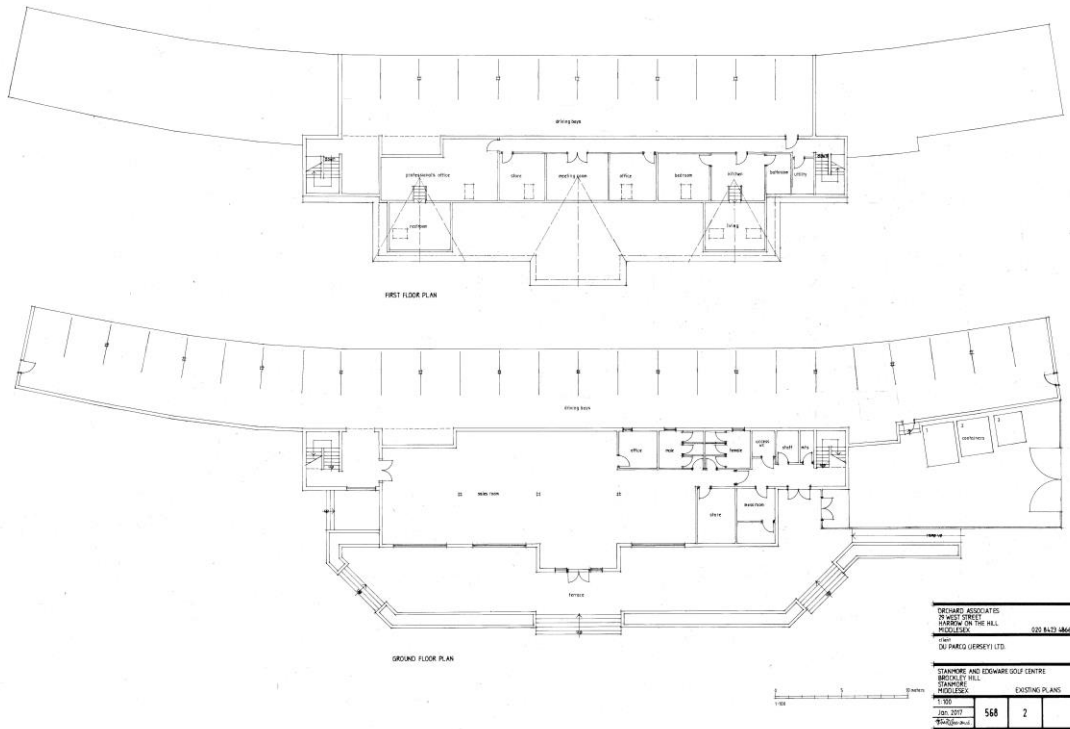
APPENDIX 4: PLANS AND ELEVATIONS



Existing Elevations

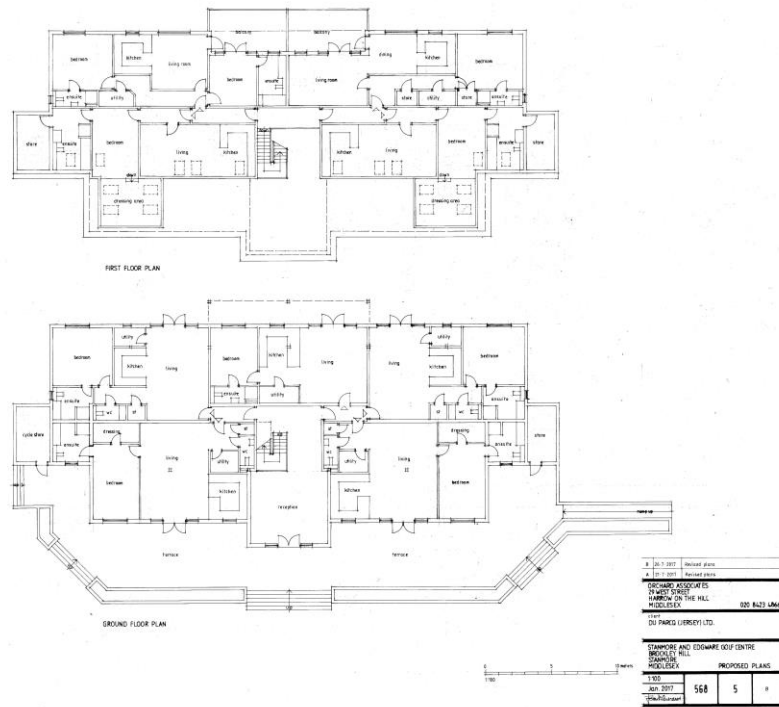


Proposed Elevations



Existing Floor Plans

NOTES
 1. All dimensions confirmed to be correct on site.
 2. Do not make drawings.



Proposed Floor Plans

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