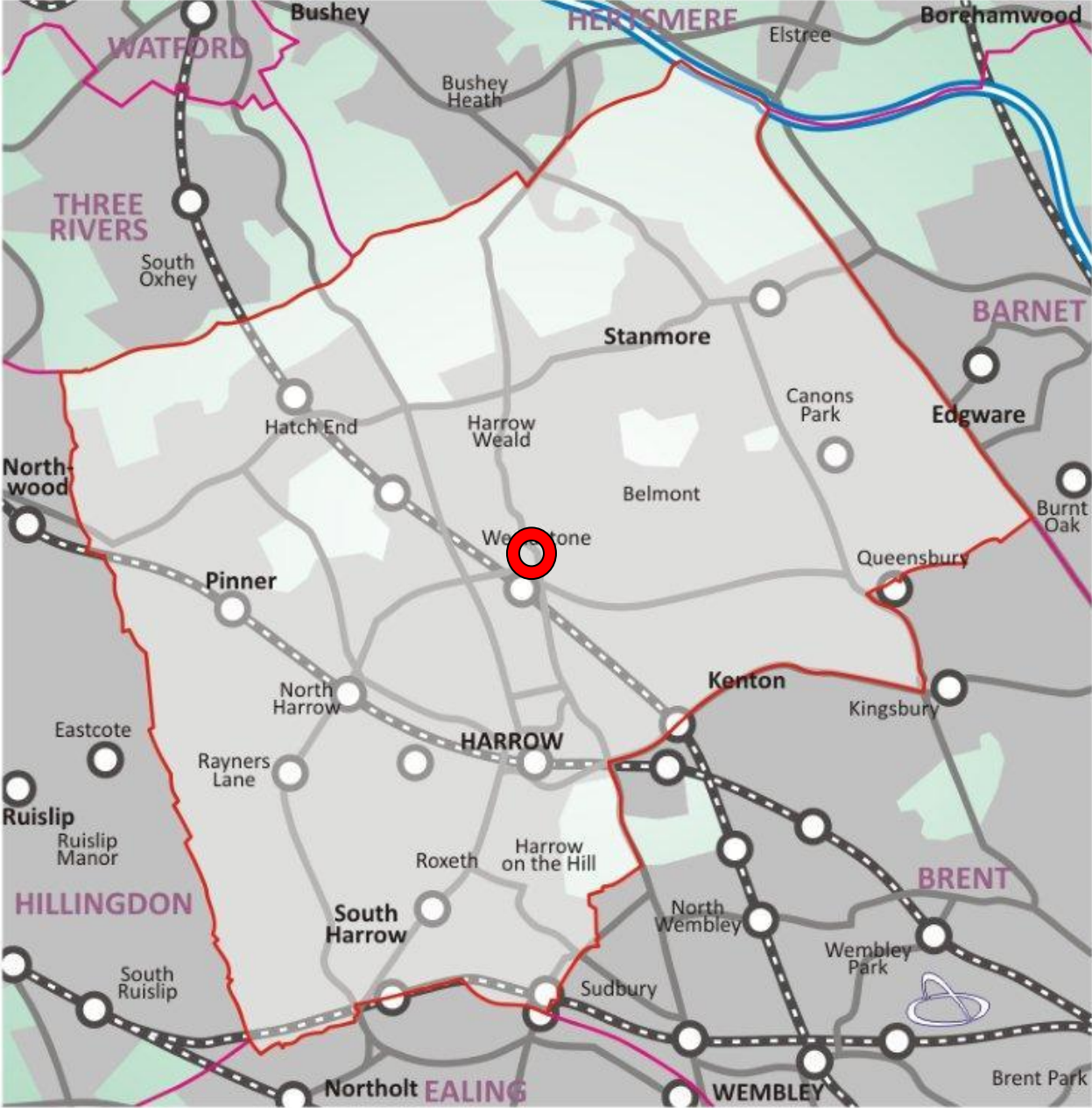
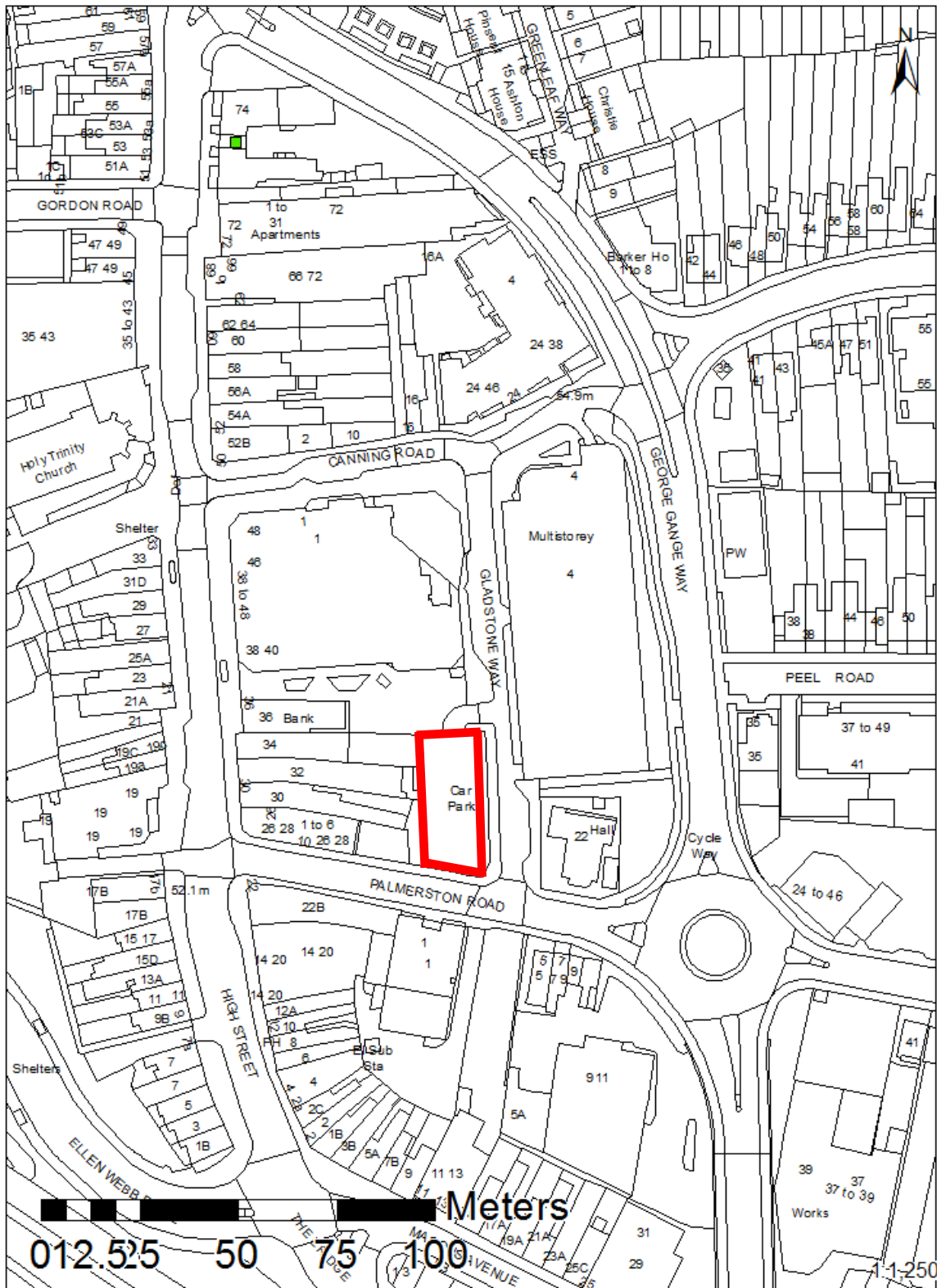


 = application site



Peel House Car Park, Gladstone Way, Wealdstone	P/5737/17
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Peel House Car Park 4 Gladstone Way



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LONDON BOROUGH OF HARROW

PLANNING COMMITTEE

21st March 2018

APPLICATION NUMBER: P/5737/17
VALIDATE DATE: 11TH JANUARY 2018
LOCATION: GLADSTONE WAY AND ADJOINING LAND AND BUILDINGS (INCLUDING PEEL HOUSE CAR PARK, NO. 22 PALMERSTON ROAD AND PALMERSTON ROAD SURFACE CAR PARK)
WARD: MARLBOROUGH
POSTCODE: HA3 7FD
APPLICANT: LONDON BOROUGH OF HARROW
AGENT: LONDON BOROUGH OF HARROW REGENERATION UNIT
CASE OFFICER: NICOLA RANKIN
EXPIRY DATE: 21ST MARCH 2018

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.

A Hybrid planning application for:

Full planning application: Redevelopment to create a part four/part six storey building with additional rooftop plant and façade/screen above fifth floor level, to provide approximately 9, 362 sqm Gross Internal Area (GIA) of office floorspace (Use Class B1) and associated civic facilities, incorporating a semi basement car park (34 spaces) /plant area, a surface level car park (57 spaces) associated public realm and landscaping works, incorporating service bays, a cycle parking pavilion/ other cycle parking.

Outline planning application: Construction of a building for a place of worship and ancillary residential use (Use Class D1 (h)) between one and three storeys in height with a single basement level to provide floorspace between 321 and VL (GIA) together with public realm and landscaping works, incorporating surface level car parking (2 accessible spaces) and cycle parking (with all matters reserved)

The Planning Committee is asked to:

RECOMMENDATION A

- 1) agree the reasons for approval as set out in this report, and
- 2) refer this application to the Mayor of London (the GLA) as a Stage 2 referral; and

- 3) subject to the Mayor of London (or delegated authorised officer) advising that he is content to allow the Council to determine the case itself and does not wish to direct refusal, or to issue a direction under Article 7 that he does not wish to direct refusal, or to issue a direction under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application delegate authority to the Divisional Director of Regeneration, Enterprise and Planning to issue the planning permission and subject to minor amendments to the conditions (set out in Appendix 1 of this report) or the Committee resolutions.

REASON FOR THE RECOMMENDATIONS

The proposals are for a high-quality development comprising a new council office building, a replacement place of worship and public car parking which would deliver economic, social and environmental benefits for Wealdstone Town Centre. The proposals demonstrate that it would accord with key relevant development plan policies. Paragraph 14 of the NPPF provides a clear presumption in favour of sustainable development and therefore it is recommended that planning permission be granted.

INFORMATION

This application is reported to Planning Committee as it is a Major Development and the Council is part land owner and therefore the scheme falls outside Schedule 1 of the Scheme of Delegation.

Statutory Return Type:	Major Development
Council Interest:	The Council owns part of the site. The planning application is subject to Regulation 3 of the Town and Country Planning General Regulations 1992.
GLA Community Infrastructure Levy (CIL) Contribution (provisional):	£273, 280
Local CIL requirement:	None

PROCEDURAL ISSUES

The application is also made under Regulation 3 of the Town and Country Planning Regulations 1992 (as amended). Regulation 3 permits a local authority to make an application to itself for planning permission to develop land within its area and to then also determine the application. In this case, the planning application has been developed and submitted by the Regeneration Unit within the Council.

The submission of the application by the local authority has another legal implication. Whereas, most applications of the scale described here would be accompanied by, or subject to, the completion of a s106 agreement, the Local Planning Authority does not have the legal locus to enter in a legal agreement (such as a s106 agreement) with itself. Therefore, in order to secure safeguards, mitigation and maximise 'planning gain' for the redevelopment of the site, an alternative mechanism is required.

In this case, the revised strategy for securing these points has a number of strands:

1. Rather than financial contributions being secured through a legal agreement, they are reported here, through the Planning Committee Report – a public document of record. The Regeneration Unit will be required, as applicant, to allocate funding to the relevant stated departments to be spent on the required social or physical infrastructure improvements
2. Rather than including detailed obligations within a s106 agreement, conditions are recommended wherever these meet the required legal tests set out within the Planning Policy Guidance and Regulation 122 of the Community and Infrastructure Levy Regulations 2011 (as amended)
3. A 'shadow' s106 will be drafted to formally sit alongside the decision notice on the application, if planning permission were granted. The 'shadow' s106 would have 3 purposes: 1) to provide definitions that relate to planning conditions; 2) as a detailed informative on the obligations of the application in the exercise of conditions of development and; 3) in the event that the land was sold to someone with the legal locus to enter into a legal agreement, they would be legally bound (by way of a condition – see point 4) to enter into the legal agreement with the local authority
4. It is recommended that the decision notice is split in two parts in a format similar to the conditions at the end of this report i.e. conditions marked with a single asterix (*) are conditions that will always be binding through the decision notice and conditions marked with a double asterix (**) includes conditions that would be replaced by a legal agreement, were the land owner to have the legal locus to enter into the legal agreement. Condition 31 specifically refers to this approach.

Though the model for development is not entirely identical to other London authorities, a similar approach has been adopted in London Borough of Camden for the determination of Regulation 3 applications that might normally have s106 agreements without legal challenge. It is considered an appropriate approach in this instance and officers recommend that it is adopted, in order to ensure the maximum planning gain is secured.

COMMITTEE RESOLUTIONS / FINANCIAL CONTRIBUTIONS

The committee resolutions would cover the following matters:

1. The temporary decanting of the International Siddhashram Shakti Centre (ISSSC) to temporary alternative premises and the provision of a replacement ashram temple shall be carried out in accordance with the Land Exchange and Development Agreement between the Council and the ISSSC.
2. A contribution of £10,000 shall be paid to the Council's Highways Department prior to the commencement of development. This contribution will enable the investigation of CPZ extension works to the surrounding highway.

3. Subject to the outcome of the CPZ investigation outlined in 1, a contribution of £50,000 shall be paid to the Council's Highways Department within 3 months of the completion of the CPZ investigation works. This contribution will enable the implementation of CPZ extension works to the surrounding highway.
4. A contribution of £5000 shall be paid to the Council's Highways Department within 1 month of the discharge of condition(s) relating to the detailed Transitional Travel Plan/ Strategy. This contribution will enable the monitoring of the Full Travel Plan.
5. A contribution of 50,000 to be paid to the Council prior to the commencement of development for the provision of at least one item of Public Art provide on a location on the land or adjacent to the site to which the public has access.
6. The Applicant will encourage local procurement with the aim of meeting the Council's 15% target of all spend to be with local suppliers and secure construction training and apprenticeships by incorporating appropriate requirements in to contracts with contractors.

BACKGROUND

In Spring 2015, following a consultation period, the *London Borough of Harrow Regeneration Strategy* was approved by Cabinet.

The Harrow Regeneration Strategy (2015-2026) is an ambitious blueprint designed to transform the borough by meeting three objectives around Place, People and Business, resulting in a wide array of improvements which will have significant benefits for residents, visitors, businesses and other stakeholders. This strategy commits to developing new homes for market sale and market rent alongside building Council homes across the Council's portfolio of sites. In addition to this, the Heart of Harrow Area Action Plan and Opportunity Area includes a £1.75bn investment programme into Harrow and Wealdstone Town Centres which will deliver 5,500 new homes, two new schools, a new library, around 3,000 new jobs and a new civic centre- all within the next decade.

In support of this regeneration agenda, Harrow Council undertook a site selection process for potential developments, across the Council's portfolio of sites. Surveys were undertaken in Town Centre car parks and on-street during November / December 2014 to inform this selection process. The most appropriate sites for development and associated budgets for developing planning applications for these sites was approved at Cabinet in September 2015.

The Council appraised all viable options for the future of the civic centre including; do nothing, refurbishing the existing building, renting or purchasing an office building or building a new civic centre. In total, the following six potential new-build site options were considered:

- Existing Civic Centre site;
- Greenhill Car Park, in Harrow;
- Peel Road Car Park;
- Byron Leisure Centre;
- Gayton Road; and
- Harrow Arts Centre.

The Greenhill Way Car Park site in Harrow is identified as Site 13 in the AAP and is allocated for mixed-use development, including civic/community/cultural uses. However, it

proved to be financially unviable to locate a new civic building on this site and maintain a level of car parking that is necessary to maintain the viability and vitality of Harrow Town centre. Furthermore, the site appraisal concluded that building a new civic centre in Wealdstone would bring benefits to the town centre's economy, including investment, new employment, housing, public realm improvements, new space for community activities and a boost to local businesses, including independent traders and high street shops and this was a major consideration in choosing this site over the previously identified Greenhill Car Park site. It should be noted that for appraisal purposes, it was assumed that the Peel Road Car Park option included 130 car parking spaces and approximately 35 homes. The application scheme makes provision for a total of 95 car parking spaces and no homes (although it includes the assembly of a site that could accommodate around 80-100 homes in the future).

Land Owners

The Applicant has had detailed discussions with the ISSC and others that own the existing ashram temple and has agreed Heads of Terms for a legal agreement to secure the re-provision of this place of worship (further details are set out in Section 7 – Statement of Need). The Applicant has had discussions with the owners of the adjoining Premier House over the proposed development, including the loss of 22 spaces within the Peel House Multi-Storey Car Park, which it is in the process of acquiring. It has also had discussions with the owners of No. 34 High Street over maintaining pedestrian access at all time to the residential flats on the upper floors and the loss of the three existing trees to facilitate the proposed replacement ashram temple.

Public Consultation and Engagement

The Applicant has developed an extensive consultation and engagement strategy for the site to develop the proposed scheme as part of an iterative process. This has included the following:

- Three bespoke consultation events including a launch and participative 'brief development' day in January 2017 and two other drop-in events in May and October 2017;
- Engagement with a large number of community organisations including Wealdstone Methodist Church, Voluntary Action Cooperation Harrow, Age UK Harrow, Weald Village TA, Holy Trinity Wealdstone, The Cedar's Youth Centre, Wellness Enterprise/Harrow in Business, Christchurch Kindergarten, Harrow Civic Residents Association, Harrow College, Citizens Advice Harrow, Wealdstone Youth Centre and Harrow Federation of Tenants and Residents Associations; and
- Community workshop in March 2017 looking at architectural character.

Two additional workshops and a further drop-in session are proposed to be held post submission of the planning application to provide feedback, look at the detailed design and fit-out of major internal public spaces – to help ensure the building feels welcoming and accessible to all and explore ways in which young people at the Wealdstone Youth Centre might make use of space in the proposed New Civic building.

Details of pre-application public consultation and how this has influenced the proposed development is set out in the separate Consultation Statement submitted with the application.

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 (2016) and Draft London Plan (2017) Policy D10 requires development proposals should maximise building resilience and minimise potential physical risks including measures to deter terrorism Local Plan Policies DM1 of the Development Management Policies Local Plan and AAP 4 of the Harrow and Wealdstone Area Action Plan (2013) require all new developments to have regard to safety and the measures to reduce crime in the design of development proposal.

The area currently suffers from relatively high levels of anti-social behaviour and crime as noted in the response received from the Designing Out Crime Officer. Given this and the proposed civic facilities, the proposed development has benefitted from input from the Metropolitan Police's Design Out Crime Officer and Counter Terrorism Security Advisor. The Design and Access Statement sets out the approach in detail. In summary, the key elements are:

- A lighting strategy that delivers a significant improvement in lighting levels of the public realm – with uniformly placed lighting columns;
- Multiple benches located in highly surveyed parts of the site;
- Incorporation of vehicle obstructions at George Gange Way/Canning Road and George Gange Way/Peel Road junctions;
- Generally low-level planting proposed, to retain pedestrian views;
- Single leaf, self-closing and self-locking doors to the proposed cycle pavilion;
- Low level timber barriers around the proposed car park to prevent scooters from easily cutting across; and
- On-street loading bays located in places that will be well observed;
- Inclusion of a roller shutter to the New Civic semi-basement car parking area.

The Designing out Crime Officer has been consulted as part of this application and has confirmed that the Metropolitan Police are satisfied with the proposals from a security and community safety perspective, subject to a condition that the development would achieve Secure by Design accreditation. Given the above, the proposed development incorporates secured by design principles and anti-terrorism accords with London Plan Policy 7.3 and Local Plan Policies AAP4 and DM1.

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

ENVIRONMENTAL IMPACT ASSESSMENT

On 28 March 2017, the LPA issued an EIA Screening Opinion in relation to a previously proposed larger scale development incorporating housing in addition to the currently proposed uses, confirming that it considers that the proposed development is not likely to have significant effects on the environment and therefore does not comprise EIA development. As such, by reason of the smaller scale of the current proposal, the LPA considers this also does not comprise EIA development.

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

Appendix 5 – Full Travel Plan Officer Comments

OFFICER REPORT

PART 1: Planning Application Fact Sheet

The Site	
Address	Gladstone Way and adjoining land and buildings (including Peel House Car Park, No. 22 Palmerston Road and Palmerston Road Surface Car Park)
Applicant	London Borough of Harrow Regeneration Unit
Ward	Marlborough
Local Plan allocation	n/a
Conservation Area	n/a
Listed Building	n/a
Setting of Listed Building	Wealdstone Police Station (Grade II Listed) and Harrow and Wealdstone Station and Station Platform Buildings (Grade II Listed)
Building of Local Interest	Locally listed buildings No. 36 High Street, Holy Trinity Church, No. 21 The Bridge
Tree Preservation Order	n/a
Other	<ul style="list-style-type: none"> • The whole site lies within a Critical Drainage Area. • Mainly Flood Zone 1. The western part of the site lies within fluvial flood zones 2/3. • Harrow and Wealdstone Town Centre Boundary. • The site is located within the Primary Shopping Area • 'Heart of Harrow' and Harrow & Wealdstone Opportunity Area. • The site lies within the Roxborough Views Setting Corridor (View of St Mary's Spire) and Wood Farm Country Park. • RAF Northolt Safeguarding Zone. • Heart of Harrow Housing Zone • PTAL 6a • Air Quality Management Area

Non-residential Uses		
Existing Use(s)	Existing Use / Operator	<ul style="list-style-type: none"> • ISSC Temple is a multicultural place of worship (Use Class D1 (h)) • Council owned Peel Road Multi Storey Car Park

		<ul style="list-style-type: none"> Council owned Palmerston Road surface pay and display car park
	Existing Use Class(es) sqm	Use Class D1 (h) and Sui Generis
Proposed Use(s)	Proposed Use / Operator	<ul style="list-style-type: none"> New building to provide 9,362sqm of office floorspace A replacement temple for the International Siddhashram Shakti Centre between 321sqm and 1672sqm
	Proposed Use Class(es) sqm	Use Class B1 and D1 (h)
Employment	Existing number of jobs	Civic Centre: 1200
	Proposed number of jobs	In respect of the wider regeneration proposals for Harrow including the subject site the Council's community Impact model identifies 32 full time construction jobs

Transportation		
Car parking	No. Existing Car Parking spaces	<ul style="list-style-type: none"> Peel Road multi storey car park: 257 spaces Palmerston Road pay and Display surface car park: 27 spaces Gladstone Way On street parking: 4 spaces (disabled badge holders only)
	No. Proposed Car Parking spaces	34 spaces, inclusive of 9 accessible spaces for the new civic building (16 staff car parking spaces and 18 pool car parking sapces) 57 public spaces Two siabled space for the Ashram
Cycle Parking	No. Existing Cycle Parking spaces	0
	No. Proposed Cycle Parking spaces	100 long stay cycle spaces 22 visitor spaces

Public Transport	PTAL Rating	6A/5 – Excellent/Very Good
	Closest Rail Station / Distance (m)	Harrow and Wealdstone Station is approximately 300m to the south
	Bus Routes	<ul style="list-style-type: none"> • 6 regular bus routes throughout the day accessible within a 640 metre walking distance from the site. • Bus stop northbound from Wealdstone Centre Stop G: 140, 182, 186, 258, 340, 640, H10 and N18. • Bus stop southbound from Wealdstone Centre stop F: 140, 182, 186, 258, 340, 640, 640 H9 and N18.
Parking Controls	Controlled Parking Zone?	Yes within CPZ CA (Mon-Fri)
	CPZ Hours	10am to 11am and 2pm to 3pm Monday to Friday
	Previous CPZ Consultation (if not in a CPZ)	n/a
	Other on-street controls	High Street is subject to a 20mph zone
Refuse/Recycling Collection	Summary of proposed refuse/recycling strategy	On street from Gladstone Way

Sustainability / Energy	
BREEAM Rating	No BREEAM rating targeted
Development complies with Part L 2013?	Development would exceed the 2013 building regulation requirement at 35.9%
Renewable Energy Source / %	PV Panels

PART 2: Assessment

1. SITE DESCRIPTION

The Immediate Site

- 1.1. The site is in Wealdstone, within the north-west London Borough of Harrow.
- 1.2. The site relates to an irregular shaped plot of land bounded to the east by George Gange Way, to the north by Canning Road, to the south by Palmerston Road and to the west by High Street Wealdstone.
- 1.3. The site is situated within the Harrow and Wealdstone Town Centre boundary and is within a Primary Shopping Area.
- 1.4. The topography of the site slopes gently upwards from west to east (High Street to George Gange Way). The site falls away to the south towards Palmerston Road. The site generally falls from north to south.
- 1.5. The application site contains the International Siddhashram Shakti Centre (ISSC) at No. 22 Palmerston Road, Peel Road Multi-Storey Car Park, the Gladstone Way surface car parking area including land at the rear of No.36 High Street and the pedestrian path between the High Street and Gladstone Way.
- 1.6. Gladstone way passes through the middle of the site, running north-south, between the rear of the properties fronting the High Street and Peel House multi storey car park. Gladstone Way is a one-way (south bound) public highway linking Canning Road with Palmerston Road.
- 1.7. The Peel Road Multi-Storey Car Park is a five-level public car park accessed from Gladstone Way, providing 257 spaces and public toilets (currently closed) with a height of approximately 7.5 metres as measured from George Gange Way.
- 1.8. Palmerston Road Pay and Display surface car park is accessed from Palmerston Road and provides 27 spaces.
- 1.9. The ISSC is a two storey building with a pitched roof to a maximum height of approximately 9.3 metres situated in the south eastern corner of the site adjacent to Palmerston Road. The building is used as a place of multicultural worship (Use Class D1 (h)) and hosts a range of activities throughout the year. It has a floorspace of approximately 321sqm.
- 1.10. Premier House is located opposite Peel House car park on Gladstone Way. Premier House is a five storey building that fronts the high street and has a service yard accessed from Gladstone Way. The ground floor of the building comprises The Wealdstone Centre which comprises Wealdstone Local Library, Harrow Health Living Centre (a charity that provides health and fitness activities and runs The Red Brick Café), an NHS Medical Centre and a Council supported Youth Club. The first floor is occupied by a banqueting suite/function room that is

used for large gatherings, including weddings. The upper floors comprise offices. Occupiers of the upper floors currently have access (via a lease arrangement) to 22 car parking spaces in the Peel Road Multi-Storey Car Park. However, the Applicant is in the process of acquiring this leasehold interest.

- 1.11. To the west of Premier House lies Wealdstone High Street, which is fronted by predominantly three and four-storey buildings (No's 26A to 36), with retail and other commercial uses on the ground floor and residential, office and storage uses on upper floors. The residential flats on the upper floors of No. 34 High Street are accessed via a pedestrian gate on the western boundary of the site.
- 1.12. Premier House has been subject to a number of planning and prior approval applications to convert the upper floors to residential use – please refer to planning history section for more details.
- 1.13. The remaining western boundary of the Site is formed by single storey out buildings and 'gardens'/yards of the three and four-storey buildings that front Wealdstone High Street
- 1.14. The northern boundary is formed by Canning Road – which is flanked mainly by two-storey commercial/residential buildings on its northern side, although there is a part four/part six-storey residential building on the corner with George Gange Way.
- 1.15. To the east, on the other side of George Gange Way, lies a vacant site on the corner with Canning Road, the single-storey Jehovah Witnesses Kingdom Hall and the two-storey residential streets of Canning Road and Peel Road and the part one/two-storey industrial/warehousing buildings fronting Palmerston Road.
- 1.16. The southern boundary is formed by Palmerston Road. This comprises single-storey commercial buildings and three-storey commercial/residential buildings on the north side of the street (up to the junction with Wealdstone High Street). The southern side of the street is fronted by two-storey houses, a five-storey residential building, an open parking area and three/four-storey commercial buildings to the rear. Planning permission has been granted under ref: P/1619/16 *subject to the completion of a legal agreement) for the redevelopment of Nos. 5-11 and 37-41 Palmerston Road and 27-33 Masons Avenue and land adjacent to 47 Masons Avenue comprising residential and commercial uses in buildings between 1 to 17 storeys.
- 1.17. The site is not within a conservation area and none of the buildings within the immediate vicinity of the site are listed. However, the application sites lies within the setting of several locally listed buildings including No. 36 High Street, Holy Trinity Church, No. 21 The Bridge and the Grade II Listed Wealdstone Police Station and Harrow and Wealdstone Station and Station Platform Buildings.
- 1.18. The majority of the site lies within flood zone 1 ('Low Probability' of flooding). A small area on the western side of the site lies within flood zone 2 ('Medium Probability' of flooding) and 3 ('High Probability' of flooding) which is associated with the Wealdstone Brook. The adjacent Wealdstone High Street to the west is located within fluvial flood zones 2 and 3 as identified in the Local Area Map (LAP 2013).

- 1.19. The site falls within the Harrow and Wealdstone Opportunity Area and the Heart of Harrow Housing Zone as identified in the local and London Plan to bring forward accelerated housing development and with significant potential for growth.
- 1.20. The site lies within the setting of two protected views identified in the Harrow Views Assessment within the Harrow Development Management Policies Local Plan (2013), including one of the elevated long views to the south from Wood farm Country Park and views to the ridge of high ground to the north from the Roxborough Road footbridge.
- 1.21. The proposal is within an area of PTAL value of 5 (very Good) with some parts achieving (Excellent) 6a
- 1.22. The adjacent A409 George Gange Way forms part of the strategic Road Network (SRN).

The Surrounding Area

- 1.23. The proposed civic centre site is identified at site 1 in the above diagram, set back from Wealdstone High Street to the west. Harrow Weald is to the north, with Greenhill and Harrow on the Hill to the south. Byron recreation ground is in close proximity to the east (site 2) with Kenton recreation ground further east (site 4) and Headstone Manor to the west (site 7). Byron Park recreation Ground is a 17 hectare space, allocated in the local plan for housing and new leisure facilities. It currently contains a range of sports pitches and other amenities, located approximately 450m to the east. Proposals for Byron Park ('Byron Quarter') anticipate that upto 600 new homes and a replacement leisure centre will be provided.

Figure 1 - Site Location



- 1.24. Harrow and Wealdstone Station, served by national and London Overground and Underground services is located approximately 300m to the south.
- 1.25. The diagram below identifies ground floor uses in the surrounding area. Retail and commercial activity is concentrated along Wealdstone's north-south High Street (A) and branching off east west along Headstone Drive (B). Pockets of business and industrial space can be seen on larger blocks, mostly closer to the railway line (C). Residential streets branch quickly off the high street. Larger residential blocks (e.g. Canning Point and Sunset House) can be seen along the George Gange by-Pass, responding to its interruption to the previous urban grain, and at the south-west corner of Byron Park (D). George Gange Way and Peel Road car park physically restrict east west permeability to and from Wealdstone High Street (E).

Figure 2 – Surrounding Area and Land Uses



2. PROPOSAL

- 2.1. A hybrid planning application is sought for:
- 2.2. Full planning permission for: *“Redevelopment to create a part four/part six storey building with additional rooftop plant and façade/screen above fifth floor level, to provide approximately 9,362 sqm Gross Internal Area (GIA) of office floorspace (Use Class B1) and associated civic facilities, incorporating a semi basement car park (34 spaces) /plant area, a surface level car park (57 spaces) associated public realm and landscaping works, incorporating service bays, a cycle parking pavilion/ other cycle parking”* and;
- 2.3. Outline planning permission for: *“Construction of a building for a place of worship and ancillary residential use (Use Class D1 (h)) between one and three storeys in height with a single basement level to provide floorspace between 321 and 1,672 sqm (GIA) together with public realm and landscaping works, incorporating surface level car parking (2 accessible spaces) and cycle parking (with all matters reserved)”*.

Proposals for Full Planning Permission

Headline Proposals

- 2.4. The detailed element of the proposal would involve demolition of the existing Peel Road multi-storey car park building (257 spaces and decommissioned public toilets) and ISSC ashram building.
- 2.5. The detailed proposals will provide for a new more efficient and compact 'civic building' for the London Borough of Harrow to accommodate council staff and public services. It will replace the existing Civic Centre on Station Road and, in doing so, facilitate the redevelopment of that site.
- 2.6. The new building will include offices, a council chamber, committee rooms, meeting rooms, a public-facing customer hub, publicly accessible toilets (including a Changing Places' toilet suitable for people with a wide range of physical and multiple learning disabilities), a marriage/multi-functional space and a roof terrace.
- 2.7. The new building will be raised about 1.4m from ground level to accommodate a semi-basement to provide plant and storage space and 34 car parking spaces, including 16 staff car spaces, 18 pool car spaces and four motorcycle parking spaces for office workers, with vehicular access from Gladstone Way. Of the 16 staff car spaces, nine (56%) will be accessible for use by disabled drivers.
- 2.8. The surrounding public realm includes a ground level car park. The proposals also include further public realm improvements around the site and around Peel Road, Gladstone Way and Canning Road.

Scale, Layout and Height

- 2.9. The proposed new 'civic building' will be located in the north eastern area of the application site and will be between four and six storeys in height with additional height provided from a roof plant top screen around the perimeter of the building.
- 2.10. The majority of the buildings massing would be over four storeys with the proposed fourth, fifth and rooftop plant screen being set in from the northern and western elevations of the building.
- 2.11. A reconfigured and consolidated surface level car park would be provided in the south eastern corner of the site (including 4 accessible spaces) for visitors to the town centre.

Figure 3 - Proposed Site Plan



- 2.12. The proposed civic building would be broadly rectangular in shape with a stepped projection on the northern elevation. The south western corner of the building curves to follow the curve of Gladstone Way.
- 2.13. The building would have a footprint of approximately 1866sqm. It will provide 9,362sqm (GIA) of office and associated floorspace at ground and above and approximately 1,736sqm (GIA) space at semi-basement level.
- 2.14. The building would have a maximum width (north to south elevation) of approximately 60 metres and depth (east to west elevation) of approximately 37 metres.
- 2.15. The building would have a maximum height above prevailing ground level of approximately 31.5 metres (between 76m and 86.5m AOD). A more detailed breakdown of the height of the building above the prevailing ground level is provided in the table below.

Civic centre storey	Height above/below AOD	Proposed height above site level
Lower Level Basement	51.350	- 3.650
Basement	52.750	-2.250
Ground Floor	56.000	+1.0
Mezzanine Floor	58.850	+3.850
First Floor	62.250	+7.250
Second Floor	66.160	+11.160
Third Floor	70.070	+15.070
Fourth Floor	74.210	+19, 210
Roof Terrace	74.630	+19.630
Fifth Floor	78.120	+23.120
Roof Level	82.260	+27.260
Parapet Level	85.960	+30.960

- 2.16. The building will have a central core with open space to the perimeter which would typically be 12 metres from the core to the glazing.
- 2.17. Floors would be connected by two stairs, both of which are needed for the fire egress strategy and a bank of lifts. A more generous stair to the north will be open to the floors to provide ease of movement between the levels. A central bank of toilets is stacked throughout the building to the south of the core.
- 2.18. The building will provide two building entrances for public access at a raised ground floor level – one to the north and one to the south.
- 2.19. The proposed northern entrance would provide access to the buildings civic meeting spaces, including the Council Chamber and committee rooms and the main entrance for the office space on the first floor and above. The proposed southern entrance would be accessed from George Gange Way or off a pedestrianised continuation of Peel Road and would provide access to the main customer services hub.
- 2.20. The proposed ground floor would contain the primary functions of the building including a new customer services, providing an inclusive and accessible interface for engaging with Council services, two significant civic rooms for Council meetings and events and use by the community, a lobby to support the office floors above and a drop in space for Council work staff. The exact ground floor fit out is being developed and is subject to change.
- 2.21. The proposed basement will accommodate car and motorcycle parking and plant and storage spaces.
- 2.22. A roof terrace is proposed at fourth floor level which is primarily intended for staff recreational use as well as some public functions.
- 2.23. The roof will provide space for the majority of the buildings plant, open to the air or in enclosures as required. The plant would be screened by a clearly defined plant parapet 3.7 metres in height

Parking, Access, Servicing and Refuse

- 2.24. Vehicle access and routing will remain as existing , with Canning Road operating eastbound only from the High Street to Gladstone Way, and westbound only from the High Street to Gladstone Way.
- 2.25. To the north of Peel Road, Gladstone Way accommodates vehicular access to Premier House, two loading bays, a non designated drop off area, access to the basement car park and a secondary pedestrian route joining the northern and southern entrances .
- 2.26. Cycle provision along George Gange Way will be retained as existing.
- 2.27. Gladstone Way will be converted to a southbound, service and access only road.
- 2.28. A drop off spot would be provided along Gladstone Way close to the new Civic Centre north entrance.
- 2.29. Vehicle access to the basement car park will be via a two way ramp that is accessed from Gladstone Way. This provision will be for cars and motorcycles only.
- 2.30. Two loading bays are proposed to be located on Gladstone Way, one on the eastern side and one on the western side of the road adjacent to the proposed building.
- 2.31. The site is intended to remain permeable to pedestrians at street level by maintain and significantly improving the existing east-west corridor between the High Street and George Gange Way and the north south corridor provided by Gladstone Way. Vehicles will not be permitted to drive on Peel Road which will be a shared use pedestrian and cyclists path.
- 2.32. Parking will be contained within the basement level for Civic Centre Use and in a surface level car park for town centre use.
- 2.33. The proposed surface level car park will be provided in the south east corner of the development with a total of 57 spaces including 53 standard bays and 4 accessible bays.
- 2.34. The surface level car park will be accessed from Palmerston Road. The design of the access will be able to accommodate two way access and egress. It is proposed that the access will be adaptable to any future circulation changes coming forward on Palmerston Road as part of the TfL Liveable Neighbourhoods scheme.
- 2.35. A total of 34 parking bays will be provided at the basement level of the building, 18 of these spaces will be for pool cars by employees and a further 16 spaces

will be independent bays. A total of 25 spaces will be standard bays and 9 spaces will be accessible. 5 motorbike spaces will also be provided.

- 2.36. Active and passive Electric Vehicle Charging Points will be provided in accordance with London Plan (2016) requirements and will apply to accessible and standard parking spaces.
- 2.37. The development will provide 100 long stay cycle parking spaces at surface level. There will also be provision for 22 short stay cycle spaces for visitor use to the rear of the new civic building
- 2.38. The refuse storage area for the new Civic Centre would be located at ground floor level with an exit to Gladstone Way. The north loading bay, to the east of Gladstone Way would be located next to the new Civic Centre refuse store. A total of 14 x 1250 litre wheelie bins are to be accommodated, to be divided between recyclable and standard waste collection.

Public Realm and Landscaping

- 2.39. The public realm strategy for the development has developed in line with a wider public realm strategy for Wealdstone Town Centre. The public realm strategy for the subject application comprises as a number of components as follow:
- Access to the northern entrance along Canning Road linking the site to Wealdstone Square.
 - Access to the southern entrance along Peel Road, with the inclusion of a cycle storage pavilion and a reconfigured public realm to improve personal safety. The route would provide a key link through the site to Byron Park.
 - Service Access along Gladstone Way
 - A new surface car park, with future development potential and the capability to host temporary events.
 - Retention of existing cycle route provision along George Gange Way which would be future proofed for forthcoming Harrow Council Highway Improvements.
- 2.40. The northern entrance would provide a wide ramp with parallel stepped access which would follow the line with Canning Road. Wide steps would be combined with a bench and planter to enclose a secondary stepped access from the northern side. The proposed access ramps would be 2 metres wide.
- 2.41. A ramped access is also proposed on the southern entrance starting from the Gladstone Way/Peel Road and ending on the south eastern corner of the building. The ramp would be integrated with perpendicular steps incorporating timber benches and small planters.
- 2.42. The proposal seeks to deliver a key pedestrian route along Peel Road to Byron Park which would include a cycle storage provision.
- 2.43. The proposed cycle storage pavilion would be a maximum 32 metres wide, 7.8 metres deep. The elevation would be stepped along Peel Road in order to accommodate a level change of 1500mm from the western end to the eastern

end of the pavilion and would have a height between approximately 3.2 and 3.9 metres. The structure would consist of a slatted timber façade and clear polycarbonate backing and integrated lighting.

- 2.44. The pavilion would adjoin the wall and gate to the boundary of the locally listed building of Lloyds Bank at No. 36 High Street to the west and the northern rear boundary of No. 34 High Street. The configuration of the pavilion would allow access to the rear of No. 34 from Gladstone Way. The pavilion would accommodate 100 employee cycle parking spaces, including a combination of double staked spaces, sheffield stands with five spaces for non-standard cycles. The structure would also include a double sub station and switch room.
- 2.45. Cycle parking spaces for visitors would be located by both the northern and southern entrances and would provide 10 and 12 spaces respectively.
- 2.46. The Peel Road access route would include a permeable rain garden in order to slow the flow of surface water towards the high street.
- 2.47. The proposed surface car park is anticipated in the medium to long term to a form a development site. In the interim period a number of playful graphic surface treatments are proposed. The northern edge of the car park adjacent to Peel Road would be treated with a vibrant marking which can be used for parking and when not in use would also host small events or markets stalls
- 2.48. The car park will incorporate low level planting and trees with canopies over 2 metres.
- 2.49. A lighting strategy is proposed for the streets surrounding the application site, linking into the wider public realm. The indicative proposed lighting across the site would consist of street lights columns at a heights of 4.5m, 5.3m 5.8m and 6m, uplighting, building mounted lighting and lighting from the cycle parking pavilion.
- 2.50. A rooftop terrace would be provided at fourth floor level. To respond to the internal uses of the building, it is outlined there is potential to split the rooftop into three areas, each with its own particular character. The proposed three character areas would consist of:
- A formal events area related to the Marriage, Multi-functional space.
 - An intermediate area providing that can be used for events and more informal activity
 - A social outdoor area for civic centre staff which could include food growing provision.
- 2.51. The proposed roof terrace will comprise of moveable planters.
- 2.52. Proposed materials have been selected from the Wealdstone Public Realm Implementation Guide and would include dark grey granite natural stone pavers, charcoal concrete, conservation grade, dark grey granite natural stone cobbles,

dark grey dense bitumen macadam, granite mid grey kerbs and charcoal concrete permeable paving.

- 2.53. The proposed landscaping scheme proposes to plant 24 trees (11 more than will be removed) including wild cherry, crab apple tree and silver birch.

Materials and External Appearance

- 2.54. The proposed north entrance would be visible from the High Street along Canning Road and would be articulated a tower with a belvedere at the fourth floor roof terrace level which would be visible above the prevailing height of the immediate context. The northern tower would have a solid façade, vertically emphasised by a series of stacked windows, with a window located immediately below the belvedere interlocking with the solid portion.
- 2.55. The proposed northern entrance would be clearly demarked with a concrete lintel and round columns, with floor to ceiling glazing set just behind to form an entry porch.
- 2.56. The north entrance would be accessed by external steps and ramps and would sit adjacent to the Council Chamber north façade.
- 2.57. The proposed southern entrance would also be clearly demarked with a concrete lintel and round columns, with floor to ceiling glazing set just behind. A recess to the façade would form an entry porch for visitors and would have a cantilevered corner to the crossing of George Gange Way.
- 2.58. The southern edge of the building would incorporate public realm ramps and steps up to the raised ground floor which would incorporate seating and planting.
- 2.59. The elevations would be organised by a rigorous 3 metre wide façade grid. The vertical piers would be reduced in width in three transitions up the building. The ground floor pier width is widest, at 850mm, while levels one, two and three have a consistent 650mm pier width. Levels four and five also have an overall 650mm pier width but only 450mm would be expressed at the outer edge of the façade.
- 2.60. The ground floor would sit above a concrete plinth which would be raised 1.4 metres from the predominant external ground level. The plinth would extend out as needed at the north and south entrances to incorporate ramps and stairs to access the building
- 2.61. The middle of the west façade accommodates several service functions, including access to the basement parking, fire stair, corridor exits, the bin store and loading area doors. The concrete finish of the plinth would be raised to frame service entrances including opening reveals. Above the door and ramp height, the building would have a more solid façade.
- 2.62. The main external building material would comprise green ceramic tile. The proposal is currently for a very restricted range of colours, predominantly in green.

- 2.63. The proposed façade articulation assumes a combination of flat and profiled ceramic tiles plus one other type of finish. The main frame of the building is proposed to be articulated in one type of finish. A second finish type will be used for the recessed head panels in order to articulate the window opening and enable a consistent vertical and horizontal frame width. It will also be used at the plant screen which forms a crown to the building, visible at a distance.

Sustainability

- 2.64. A number of measures are to be incorporated into the design to minimise carbon emissions and enhance the site's sustainability criteria, including the use of renewable energy in the form of solar PVs and a CHP energy centre.
- 2.65. The public realm has been designed to safeguard connections to a potential future District Energy Network for both the civic centre and the ISSC Ashram.

Proposals for Outline Planning Permission

Parameters

- 2.66. A replacement ashram for the International Siddhashram Shakti Centre (ISSC) of between 321sqm and 1,672sqm (GIA) within a building with a single-level basement and one to three-storeys above ground – with a maximum height above prevailing ground level of between approximately 9.2 and 13.8m (between 62.015 and 67m AOD). All matters are proposed to be reserved for subsequent approval, including appearance, means of access, landscaping, layout and scale.
- 2.67. The replacement ashram temple is expected to include ancillary sleeping accommodation at ground floor or above for the occasional use by its priests, visiting artists and saints.
- 2.68. The parameters for the proposed new ashram require at least the same amount of floorspace as existing to ensure no net loss, but also allow for a significant increase. Vehicular access would be restricted to the Gladstone Way frontage and would serve two dedicated accessible car parking spaces and cycle parking to ensure that the replacement facility is self-contained.
- 2.69. The plot is expected to have vehicular access from Gladstone Way (at a reasonable distance from its junction with Peel Road) and include two car parking spaces suitable for disabled staff and/or visitors.
- 2.70. The proposed building use class would be D1 (h) which is defined as “*for, or in connection with, public worship or religious instruction*” in The Town and Country Planning (Use Classes) Order 1987 (as amended).
- 2.71. Pedestrian access is intended to be anywhere along the Palmerston Road and Gladstone Way frontages

- 2.72. The proposed maximum and minimum building footprint above and below ground would be the entire site which covers an area of 500sqm.
- 2.73. The building would have a maximum floorspace of between 321sqm and 1,672sqm
- 2.74. The maximum height of the building above ground would be +67.000m AOD but based on the following envelope parameters:
- Up to +62.015m AOD, the horizontal limit of the envelope is the entire site
 - Above +62.015 AOD and up to + 67.000m AOD, the south limit of the envelope is sloped 31 degrees to the horizontal as illustrated on the submitted parameter plan drawings 01 and 02.
 - The proposal would allow for a maximum single level basement below ground under the entire site.
- 2.75. The maximum building height would mechanical plant but excludes flues.
- 2.76. The maximum building height above ground includes balconies and other protruding structures/features.

3. RELEVANT PLANNING HISTORY

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

Ref no.	Description	Status and date of decision
P/1127/17	EIA Screening Opinion to determine whether an Environmental Impact Assessment is required for demolition of existing buildings and erection of new buildings to provide approximately 10,500sqm of office floorspace (B1), a 600sqm temple (D1), up to 400sqm flexible commercial and community floorspace (A1, A2, A3, B1 and D1) and upto 100 residential dwellings (C3) in buildings between one and up to 18 storeys in height; Basement car parking/cycle parking/servicing area/plant served by a new vehicular access from Palmerston Road and public realm and landscaping works, incorporating surface level servicing areas.	EIA Not Required 07.03.2017
EAST/619/95/LA3	Alterations and extension to provide 3 decks of additional car parking	Granted 10.10.1995
LBH/28440	Formation of a public car park	Granted 10.10.1985

3.2. A summary of the relevant planning application history for the surrounding area is set out in the table below:

Deller and Palmerston Road Site:

Ref no.	Description	Status and date of decision
P/1619/16	Redevelopment of the site to provide 186 residential units (Use Class C3); 1,165sqm office floorspace (Use Class B1) and 695sqm flexible commercial and community floorspace (Use Classes A1, B1, D1, D2) in buildings between 1 and 17- storeys in height; basement to provide car parking and cycle parking spaces; one vehicle access from Palmerston Road and one vehicle access from Masons Avenue; refuse storage; entrance gates; public realm and landscaping; photo-voltaic panels; demolition of existing buildings.	In March 2017 the Mayor of London, acting as the local planning authority, resolved to grant planning permission for this site, subject to the completion of a section 106 agreement.

36 High Street:

Ref no.	Description	Status and date of decision
P/1070/17	Conversion of first and second floors with accommodation in roof from two flats to five flats ; Enlargement of rear dormer; Refuse storage	Granted 8 th May 2017

Premier House:

Ref no.	Description	Status and date of decision
P/2349/17	Prior Approval granted for conversion of fourth floor to offices (Class B1A) to 10 self-contained flats (Class C3).	Granted 4 th October 2013
P/2542/14	Prior approval granted for conversion of second floor offices (Class B1A) to 9 self-contained flats.	Granted 22 nd August 2014
P/0120/17	Creation of a new fifth floor to accommodate nine additional flats with associated external alterations.	Granted 31 st July 2017

P/1727/17	Prior Approval Office to Residential - Conversion of offices (Class B1A) on 3rd floor (part) and fourth floor to 45 self-contained flats (Class C3)	Granted 31 st July 2017
P/3123/17	Change of use of existing Class D1 Use on part of second and third floors to 22 single occupancy units (HMO) with shared cooking facilities on each floor (Sui Generis)	Resolution to grant, subject to legal agreement in September 2017.
P/4275/17	Conversion of offices (Class b1a) to 98 self-contained flats (Class C3) (prior approval of transport & highways impacts of the development, and of contamination risks and flooding risks on the site, and impacts of noise from commercial premises on the intended occupiers) (resident permit restricted)	Resolution to grant, subject to completion of a legal agreement by 28 th February 2018.
P/4357/17	Creation of a new fifth floor to accommodate 17 HMO single occupancy units with shared kitchens and lounges (Sui Generis) and shared facilities for the residents of the C3 areas below for co working office, gym (114m2); Provision of Refuse/Recycling Facilities and Cycle Parking; External alterations at ground floor level	Resolution to grant on 14 th December 2014, subject to completion of a legal agreement by 28 th February 2018.

35 Canning Road (Former Magic Car Wash Site)

Ref no.	Description	Status and date of decision
P/4023/17	Change of use of site (Sui Generis) to Public Car Park With 12 Car Parking Spaces (Sui Generis); Revised Vehicle Access Off Canning Road; Re-Grading and Levelling of Site; Replacement of Western Boundary Wall with Placement Guard Rails (900mm High; replacement close-boarded fence on the eastern boundary up to 2.8m in height.	Granted 1 st November 2017

Council Depot:

Ref no.	Description	Status and date of decision
P/4767/17	Redevelopment to provide part single, part two and part three storey building with plant room on roof and part first floor mezzanine incorporating workshop (B1 light industrial), office (B1 use), warehouse (B8 use) and ancillary uses; multi storey car park and external car parking; bin store (demolition of existing buildings)	Committee Resolution to Grant on 22 nd February 2018

4. **CONSULTATION**

- 4.1. 10 Site Notice was erected on 25th January expiring on 9th February 2018
- 4.2. A Press Notice was advertised in the Harrow Times on the 18th January 2018 expiring on 8th February and on 25th January 2018 expiring on 15th February.
- 4.3. The application was advertised as a major application, a departure from the development plan and for the impact on the setting of a listed building.
- 4.4. A total of 1268 consultation letters were sent to neighbouring properties regarding this application.
- 4.5. The overall public consultation period expired on 1st February 2018.

4.6. Adjoining Properties

Number of letters Sent	1268
Number of Responses Received	1
Number in Support	0
Number of Objections	1
Number of other Representations (neither objecting or supporting)	0

- 4.7. A summary of the comments from the objector are as follows:
- The new civic centre lacks a number of facilities that are included in the current civic centre including a Council chamber, committee rooms, customer service.
 - The proposal will reduce overall staff numbers

- The proposal will result in the loss of Wealdstone Library
- The proposal will result in loss of parking space

4.8. The above comments are addressed throughout the main appraisal of this report. The Wealdstone library will remain on the ground floor of The Wealdstone Centre.

4.9. Statutory and Non Statutory Consultation

4.10. The following consultations have been undertaken:

LBH Environmental Health
LBH Highways
LBH Drainage Engineers
LBH Vehicle Crossing Officer
LBH Planning Policy
LBH Design
LBH Conservation Officer
LBH Tree Officer
LBH Education
LBH Landscape Architects
LBH Lighting Section
LBH Waste Management Officer
LBH Public Realm Maintenance
LBH Bio Diversity Officer
LBH Economic Development
LBH Corporate Estates
LBH Head of CCTC Operations
LBH Urban Design
Transport For London
Greater London Authority
Affinity Water
Environment Agency
Designing Out Crime Officer, Metropolitan Police Service
British Gas
Thames Water Authority
Brent and Harrow Chamber of Commerce
NHS Harrow
London Underground Limited
Network Rail
Ministry of Defence
Campaign for a Better Harrow Environment

4.11 Statutory Consultation

4.12 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	<p>We have reviewed the information submitted and consider there to be a low environmental risk. We therefore have no objections.</p> <p>Although a small area of the western part of the site falls within Flood Zone 3, the proposed development is sequentially located in Flood Zone 1, low risk.</p> <p>Flood Risk Activity Permit Informative: Under the terms of the Environmental Permitting Regulations a Flood Risk Activity Permit is required from the Environment Agency for any proposed works or structures in, under, over or within 8 metres of the top of the bank of the Wealdstone Brook designated as a 'main river.'</p> <p>Details of lower risk activities that may be excluded or exempt from the Permitting Regulations can be found on the gov.uk website. For further information please contact us at PSO-Thames@environment-agency.gov.uk</p>	<p>Noted. The informative is attached to remind the applicant of the potential need to obtain a Flood Risk Activity Permit.</p>
LBH Drainage Engineers	<p>We can confirm that the Flood Risk Assessment submitted seems fine, however no detailed drainage design has been provided.</p> <ul style="list-style-type: none"> - The applicant should submit drainage details in line with our standard requirements attached. <p>We refer to recently received correspondence regarding the above site and we have the following comments:</p> <ol style="list-style-type: none"> a) A copy of a letter from Thames Water with permission for connections to the public sewers is required. b) The development is subject to a limitation on a discharge to 5 l/s/ha from all impermeable areas, consequently there will be a storage implication and the system should be checked for no flooding for a storm of critical duration and period of 1 in 100 years. These storage calculations should include all details of inputs and outputs together with impermeable and permeable areas 	<p>Noted. Conditions are attached below in respect of works for the disposal of sewage and surface water, together with surface water storage and attenuation works.</p>

	<p>drained. Please note that the M5-60(mm) is 21 and the Ratio “r” should read 0.43 for this region. Similarly the Volumetric Run-off Coefficient should be substantiated by calculations (Reference to Chapter 13 of The Wallingford Procedure) or a figure of 0.95 should be used for winter and summer. Please note that a value for UCWI of 150 is appropriate when calculating Percentage Runoff (PR) for storage purposes. Please include 40% allowance for climate change.</p> <p>c) Full details of drainage layout including details of the outlet and cross section of proposed storage are required.</p> <p>d) Full details of any flow restrictions (hydrobrake, pumping station) that are proposed for this scheme need to be submitted together with the relevant graphs.</p> <p>e) Full details of SuDS including permeable paving, with construction details and maintenance plan should also be provided.</p> <p>f) Management Plan for disposal of ground water during construction phase is also required.</p> <p>g) Drainage proposals should comply with the council Local Flood Risk Management Strategy.</p> <p>Please be informed that the requested details can be conditioned, attached are our standard drainage conditions / informative for reference.</p>	
<p>Transport for London</p>	<p><u>Walking and Cycling Access</u></p> <p>The analysis of local cycling conditions identifies key destinations in close proximity of the site which helps to demonstrate potential for cycling in the local area. TfL expects that specific improvements including those suggested below to be implemented by Council as developer and highway authority, to improve</p>	<p>TFL comments are addressed in Paragraphs 6.61 to 6.647.</p>

the safety and comfort of those cycling to/ from the site and along the routes assessed.

The “reinstatement” of the line of Peel Road through the site, to re- provide an east-west corridor from the High Street towards the direction of the local Park, is a considerable asset to the proposals and to the regeneration of the town centre. It would however be useful if the applicant provides further detail on how Peel Road would be designed in order to give priority to pedestrians but also to allow cyclists to travel through. It is arguably rather too narrow at the High Street end to provide shared use especially with the current landscaping taking up space at this entry point and, yet, cyclists should be able to ride their cycles up to the entrance of the proposed stand-alone cycle store pavilion.

The site-wide ground floor plan shows a puzzling wavy design in the zone where the public car park becomes public realm, it is not known if this is to address level changes – but in any case it should be designed with the needs of pedestrians, cyclists and sight-impaired people in mind. To improve security and a more pleasant public realm along the new Peel Road route, the south face of the new Civic Centre building could be re-designed to be more ‘active’ or at least enlivened, thus lessening the dominance of the entrance ramps.

TfL welcomes the Cycling Level of Service (CLoS) assessment provided and that it has highlighted the low level of service along the segregated two way cycle track on George Gange Way as well as on the junctions connection the links assessed. Detailed comments on designing for better cycling infrastructure are as follows: -

- Drawings suggest that the 2-way cycle track along George Gange Way is within the boundary of the site. If so, there is an opportunity to improve the quality of this cycle track. We remind that LCDS suggests a minimum of 2 metres width for two-way tracks with very low flow.
- Also, for consistency and legibility purposes, it would be better if the cycle track on

	<p>George Gange Way connected to the existing cycle track on Canning Road. Instead, the proposal suggests a shared use space for a section of this route; and the west/north corner of the building seems to create some sort of pinch point for pedestrians/cyclists. This ambiguity should be resolved.</p> <ul style="list-style-type: none"> • In order to increase access and permeability of cyclists to and through the site, it might be sensible to consider – subject to road safety analysis – to allow cyclists to travel contra-flow along Gladstone Way when the traffic circulation change options briefly outlined in section 2 of the TA are progressed. • Narrow corner radii should be designed for the entrance on Gladstone Way, with a raised table and/or continuous footway treatment in order to give priority to pedestrians and cyclists over traffic coming turning into Gladstone Way. • In order to improve accessibility into the area and enhance west-east corridor, consideration could be given to provision of a pedestrian crossing / parallel crossing on High Street, aligned with pedestrian ‘desire lines’. 	
	<p><u>Access and Parking for Vehicles and Cyclists</u></p> <p>TfL recognises that the Council is moving from an existing site with very high car parking provision- 665 spaces- and that the applicant has established that a majority of those who drive to the offices do so due to convenience rather than necessity.</p> <p>Eighteen of the 34 basement staff spaces on the new site will be used by Council pool cars and the Council’s operational fleet so the step change for car use towards other modes of transport (in this very accessible location) will be large. This accords with the aims of the Area Action Plan and the new draft London Plan for such a shift. The pool cars will also enable staff that need to make visits to parts of the borough which are difficult by public transport or walking and cycling to carry out their work effectively without needing to use their own car and drive to/from the office. The applicant identifies the</p>	

	<p>importance of a good, interactive travel plan to support the transition to less car-dominated travel patterns.</p> <p>For these reasons and acknowledging the forecast overall reduction in vehicular trips from current conditions, TfL supports the quantum of spaces for staff as well as the quantum of surface spaces (57), for town centre use. It is hoped that the latter will be a 'meanwhile' type use pending future regeneration plans. TfL supports the relocated ISSC Ashram building having two on-site disabled spaces, but in order to manage impacts of peak-time parking for this use, up-to-date travel surveys and a combined framework for travel planning and parking management must be supplied as part of the next (Full) application.</p> <p>Turning to cycle parking, the development will provide 100 long-stay cycle parking spaces in the new Pavilion adjacent to the Civic centre. Whilst its ground-floor level is welcomed the quantum does not meet the uplifted ratios sought by the draft new London Plan; additionally five percent of spaces should also be designed for larger cycles as described in TfL's London Cycle Design Guidance. As TfL's pre-application advice was given prior to the publication of the new draft London Plan and the facility designed accordingly, it will not object to the levels falling short of the uplifted standards in this particular case. The provision for 22 short-stay cycle spaces for visitors' use to the rear of the New Civic Building, located in the public realm to the south of the building, is in excess of the extant London Plan minimum standards and this is welcomed.</p>	
	<p><u>Traffic Surveys, Trip Analysis and Public Transport</u></p> <p>No further modelling of impacts is required for this application: the applicant has followed pre-application advice and supplied a robust analysis of current and future trip generation and mode shares. This reflects a step change away from car-dominated travel patterns. It is accepted that there will be – and needs to be – a reduction in car trips compared with the present</p>	

	<p>levels on both this site and the existing civic centre.</p> <p>Based on the analysis it is unlikely that the scheme will generate capacity issues for public transport. There are several high-frequency bus services passing by the site and no mitigation will be required for buses. TfL will review the network in the next 12 months approximately, but at present there are no plans to make any changes to bus services in Harrow. As to rail accessibility and encouraging use of this sustainable transport mode, it is noted that there is step-free access to the platforms of the nearby Harrow & Wealdstone station (Network Rail maintained). This station is at the start of the line hence city-bound carriages are empty when drawing into the platform, although travel back in the afternoon peak from central London is more problematic. It is considered there is likely to be adequate train capacity, however the cumulative added journeys from other regeneration schemes could engender a re-visit of capacity analysis.</p>	
	<p><u>Servicing and Delivery Access, Vehicle Swept Path Analysis</u></p> <p>A Framework Delivery and Servicing Plan and vehicle swept paths have been included in the submission as requested. However although TfL gave cautious in-principle support to servicing being located on Gladstone Way rather than the more heavily-used surrounding network, the worked-up design could have some potential road-user conflicts without more of a clear or even physical delineation between spaces expected to be used by vehicles and vulnerable road-users.</p> <p>All deliveries and refuse collections will take place in two loading bays described as being “within the development on Gladstone Way”. This does not acknowledge that the servicing is on-street rather than in the interior of the new building and furthermore that lorries (up to 12.0m anticipated) will then need to continue one way southwards to cross over the new pedestrian/cycle route.</p>	

	<p>Even allowing for their aim to undertake all servicing outside peak hours, the applicant should clarify the design and operation further to demonstrate safety of vulnerable road users has been prioritised. In a similar fashion the following intention should be re-examined “As the loading bay and carriageway are both flush with the footway there is no need to provide a dropped kerb”. This does nothing to prevent accidental migration of manoeuvring lorries into the path of pedestrians.</p> <p>Lastly, it would be reassuring to have it confirmed that Facilities Management’s location within the Civic Centre could be arranged so as to have a direct view over Gladstone Way’s servicing lay-bys and the crossing point over the re-instated Peel Road pedestrianised route. If Gladstone Way is intended to continue to be dedicated as public highway, there will be no legal way to reserve use of the lay-bys for Council traffic alone and competition/queuing from other commercial traffic seeking to use the spaces may occur with resulting road safety implications.</p>	
	<p><u>Mitigation</u></p> <p>Measures could include, but are not limited to developing a wayfinding strategy and potential Legible London wayfinding signs in the local area; and contributing to improvements to cycling infrastructure in the locality (given the CLoS does identify its lack and/or need for improvement)</p>	
	<p><u>Travel Plan an Construction</u></p> <p>A framework/draft Travel Plan has been submitted to an acceptable standard. It is accepted that the Travel Plan for the place of worship (a replacement facility for the ISSC Ashram on Palmerston Road) will be developed when a detailed application is progressed. The success of both this and the main Staff Travel Plan is dependent upon effective management combined with clearly defined roles. TfL welcomes the clear lines of responsibility outlined in the TA and expects the final travel plans to be secured, monitored, reviewed, and</p>	

	<p>enforced through the legal agreement or undertaking the TA says the Council will make.</p> <p>Construction access, routeing and programming must be set out in a Construction Logistics Plan (CLP); this is in line with more detailed advice given in the pre-application advice for the other two above-mentioned regeneration schemes. It would be practical to link the construction plans through complementary phasing (so as to co-ordinate and manage activities and avoid high vehicle movements at two or three sites at the same time). Shared construction logistics and supply may also be worth considering.</p>	
<p>Greater London Authority Stage 1 Response</p>	<p>Summary:</p> <p><u>Principle of Development</u></p> <p>Locally, the Harrow and Wealdstone Area Action Plan, identifies the current civic centre as a key development site in the Station Road sub area, which has targets of 380 jobs and 390 homes. The proposed provision of a new Civic Centre on this site will provide modern floorspace for use by the Council and the wider community, as well as facilitate the redevelopment of the existing Civic Centre for residential led development as part of the wider regeneration aspirations of Harrow Council and is therefore strongly supported.</p> <p>The permanent relocation of the International Siddhashram Shakti Centre (ISSC), detailed in a Draft land Exchange and Development Agreement is supported.</p> <p>The proposed loss of 193 car parking spaces is considered to be acceptable on a strategic basis and will comply with LP policy 6.12 and draft London Plan policy T6 which aim to reduce car parking in town centres and promote cycling, walking and public transport use.</p> <p><u>Climate Change</u></p> <p>The carbon dioxide savings exceed the on-site target set within policy 5.2 of The London Plan and Policy SI2 of the Draft London Plan; however further information is required relating</p>	<p>Noted.</p> <p>In respect of climate change conditions are recommended in relations to connection to a DHN/provision of CHP.</p> <p>In respect of transport conditions are recommended in relation to securing cycle parking and EVCP in accordance with LP Standards and a construction management plan and delivery and service plan.</p> <p>Conditions are also recommended to secure a TP for the ISSC and new civic building.</p>

	<p>to the provision of a site wide heat network, future connection to a district heating network, the CHP and the roof layout of the photo voltaic panels.</p> <p><u>Transport</u></p> <p>No further modelling impacts is required for this application, and its robust analysis rightly reflects a step change away from car dominated travel patterns. There are several high frequency bus services passing by the site and no capacity mitigation will be required. There is also adequate train capacity; however, it is possible that the cumulative added journeys from other regeneration schemes could engender a re –visit of capacity analysis. TfL is currently considering this point further and will liaise with the applicant and the Council if or as required. There is already step free access to the platforms of nearby Harrow and Wealdstone Station</p> <p>The proposed cycle parking and surface car parking should be reviewed to meet Draft London Plan standards. EVCPs should also be provided in accordance with the Draft London Plan, and opportunities for cycling identified in the CLoS should be secured in line with the draft London Plan Policy T5 and London Plan Policy 6.9. A detailed construction management plan, travel plan and delivery and service plan must be secured.</p>	
<p>LBH Highways</p>	<p><u>Access and Highways</u></p> <p>It is proposed to take vehicular access into and out of the site via Canning Road and Gladstone Way as is the existing arrangement, however this would be for ‘Access Only’ mainly for deliveries and servicing and access to the staff basement car park.</p> <p>A new pedestrian/cycle route through the site is proposed as a continuation of Peel Road running east/west.</p> <p>Access to/from the surface level public car park would be from Palmerston Road. The proximity to the roundabout at A409/Palmerston Road</p>	<p>In response to comments from Highways the applicant has provided further analysis and information has been provided in relation to the Staff Survey and access to the surface car park.</p> <p>The comments are addressed</p>

	<p>would mean that right turning traffic into the car park may cause queues to build going back into the roundabout, furthermore this may conflict with the proposed access to the consented scheme opposite on the former Deller site. In order to avoid this, the access to and from the car park may need to be altered to allow exit only onto Palmerston Road and partial two way traffic along Gladstone Way to allow entry into the car park where bays 38 and 39 are shown. This would result in the loss of the two parking spaces.</p>	<p>in paragraphs 6.61 to 6.647.</p>
	<p><u>Trip Generation</u></p> <p>The transport assessment identifies that that there would be an overall increase in trips generated by this redevelopment. This is expected as the site is mainly used for car parking at present.</p> <p>The predicted travel modes may be underestimated as there is an assumption that the significant reduction in on-site car parking and travel plan measures will mean that staff will travel by alternative means. The method of analysis of the predicted trip generation looks at existing office sites elsewhere and Census data rather than using the actual data from the staff survey.</p> <p>The report assumes that current car trips to the existing Civic Centre are the preferred mode of travel due to the availability of car parking space. Unfortunately there is no evidence provided to support this claim. The staff survey is not included, therefore it is not possible to know what questions were asked and why people travel by car. It is likely that the availability of car parking makes it easier for car travel, however it doesn't automatically mean that this is the main reason why people are travelling by car. As the new site is only 400-500 metres from the existing site, and the same public transport options exist at both, we can also assume that many people will choose not to alter their preferred mode of travel as it will still be possible to park on-street on the roads to the west of the site where the CPZ will remain unchanged. Flexible working may make it</p>	

	<p>possible to park on these roads and avoid the operational hours of this part of Wealdstone CPZ. Furthermore, there are options for free parking to the north which will include a short walk, but may still be favoured over modal shift. It should be noted that not all existing staff have access to the car parks at the current site as there is no automatic entitlement to a car park pass. Many staff already park on-street either using CPZ bays, pay & display or park further away and walk to the office.</p> <p>The trip generation data indicates that even with a reduction in on-site parking, there will still be demand for parking that exceeds the number of parking spaces proposed for staff use and will most certainly result in on-street parking. Notwithstanding this, should the predicted modal shift be realised, this would result in a significant reduction of car trips on the surrounding highway network which is considered a valuable benefit.</p> <p>Based on the predicted trip rate, there would be a large increase in public transport travel. TfL have indicated that there is no need to increase capacity on any mode, however combined with other future development in Harrow, there is going to be a significant demand for public transport use, particularly in this part of the borough where Harrow & Wealdstone station is based.</p> <p>The Liveable Neighbourhood scheme put forward by Harrow Council was intended to enable and support the substantial modal shift, however, TfL chose not to fund the scheme and therefore these proposals will not be realised. In order to persuade modal shift at what is a substantive rate, it would be essential that the transportation infrastructure can accommodate the levels of passengers anticipated to be a realistic option for commuters from day one and continuing into the future</p>	
	<p><u>Parking</u></p> <p>Staff Parking The proposed staff parking is to be provided in a semi-basement offering 34 spaces which is 5% of the existing amount available at the</p>	

current site. This is a major reduction in space and would require a lot of work to achieve the required change in travel habits. There is a risk associated with staff recruitment and retention as existing travel patterns have been established for some time and will require alterations to lifestyles and would potentially have financial implications for some people. It is likely that for some staff, the changes required will not be feasible. A total lack of parking may also dissuade potential employees who would find alternative travel modes difficult. Harrow is a borough on the outskirts of the city where it wouldn't necessarily be expected that there is no on-site parking. Neighbouring boroughs, Ealing, Brent and Hillingdon do offer more on-site parking despite regeneration projects. The Operational impact to the council could be severe.

The numbers proposed, although compliant with London Plan standards (which would allow for a maximum of between 15 and 93 spaces for non-operational use), appear to be woefully inadequate and rely on a target of modal shift which is unprecedented what would seem to be an unrealistic rate. The 34 spaces have been allocated to uses that result in 7 standard bays being available for general staff use.

Considering that there is a workforce of over 1,200, this appears to be an extremely low provision. The remaining spaces are split as 18 for pool cars (operational use) but there is no analysis of whether this amount is sufficient for the site and 9 are disabled bays but there is no evidence of this meeting the requirement of one disabled parking space per disabled employee. The layout of the car park means that the pool cars would be double banked. These would need to be carefully managed to ensure that there is continuous free access.

It is acknowledged that the existing car parking offered at the current site is very generous and does not encourage more sustainable travel; however it is also acknowledged that some car travel is necessary and appropriate levels of provision should be identified based on need rather than design or financial constraint. More supportive evidence from the staff travel survey

	<p>would enable a factual and balanced assessment of travel needs to be made. Postcode plots and associated travel options should have been included in the TA to demonstrate how practical the transfer from one travel mode to another would be.</p>	
	<p><u>Public Parking</u></p> <p>This proposal seeks to provide a surface level car park on Palmerston Road offering 57 spaces.</p> <p>This application indicates that the proposed surface car park is intended to be developed in the future, however Wealdstone would be at a disadvantage in comparison to other district centres such as North Harrow, Pinner, Stanmore or Hatch End if it does not have appropriate levels of public car parking. The proposal to relocate the Civic Centre to the town is likely to bring higher parking demands.</p> <p>The assessment looks at the existing demand on the multi storey and surface level car parks, however there is no assessment of public parking demand associated exclusively with the current Civic Centre. This is likely to transfer to the new site but hasn't been accounted for. It is not appropriate to assume that the public would simply alter their travel choices just because there is no dedicated parking. Again, there remains the option to park on-street outside of CPZ operational hours. The existing high turnover at the surface level car park is unlikely to cease as the reasons for parking there are not likely to change; the short stays of around 45 minutes indicate that these are shoppers visiting Wealdstone. The combined demand of shoppers and Civic Centre visitors is likely to mean that the car park will be very well used and may frequently lack capacity.</p> <p>The proposed layout may need to be revised as mentioned under Access and Highways. Furthermore, the landscape plans show that there is an area to the north of the car park indicated as 'flexible use space for parking and events facing Peel Road.' It isn't mentioned how this would be managed and a car park</p>	

	<p>should only be used for parking vehicles unless closed for other purposes. There is open space for public events already available between the car park and the new building furthermore a town square is being developed at the junction of Headstone Gardens and High Street.</p> <p>The loss of Peel House car park is likely to have a negative effect on businesses in Premier House and this project does not seek to offer any mitigation. The banqueting suite will be worst affected. The type of events that take place there would result in a low number of people travelling by public transport. These are generally weddings and large social events; people may travel long distances and may not feel comfortable with travelling on buses or trains due to attire, safety perceptions and general practicalities. As many of the events take place outside of peak times, during the evenings and at weekends, it may still be possible for attendees to utilise the surface level car park, however this is a further potential demand on the limited spaces.</p> <p>The business permits issued for use at Peel House car park have not been fully accounted for in the assessment. It is noted that 40 are likely to be relocated to the Depot in Forward Drive, 22 are associated with businesses that are likely to be affected by the consented schemes for Premier House and may relocate but there is no mention of the remaining 40.</p> <p>Whilst the Council does not have an obligation to continue providing this facility, the negative impact that the removal of the parking spaces and subsequent loss of business permits would have without re-provision should still be considered. It would not be appropriate to use any of the space within the surface level car park for this type of long term parking as it has been demonstrated that there is an existing significant high turnover of short stay parking.</p>	
	<p><u>Servicing and Refuse Access</u></p> <p>Servicing and refuse collections would take place from loading bays on-street in Gladstone Way. This area is intended to be a low traffic</p>	

	<p>flow, low speed, shared Space Street. This is not the preferred arrangement as it would not be possible to prevent other businesses from using these facilities for similar purposes. The site constraints make it difficult to locate any servicing area within the footprint of the building.</p> <p>On-street servicing can be achieved provided there is enough space for all road users. Speeds must be maintained at low levels through appropriate design. The servicing demands of the Civic Centre already appear to be fairly low but could potentially be reduced further through procurement and the reduced number of staff on site.</p>	
	<p><u>Walking and Cycling</u></p> <p>The PERS and CLoS reports are welcomed. Further to comments from TfL regarding cycling facilities, it is agreed that the cycle track on George Gange Way may need to be reviewed and upgraded to make this a practical facility. Further consideration of the route through Peel Road is required and may need some revisions to landscaping. This is a key element of the proposal and connects to wider cycling aspirations coming forward as part of other schemes including the Quiteway cycle route planned in the future.</p>	
<p>Additional comments from LBH Highways</p>	<p>The additional staff survey and revised transport notes means we are now in a position to accept the proposal subject to conditions:</p> <p>CPZ investigation £10,000 (pre commencement) CPZ implementation £50,000 (subject to outcome of investigation) Full Travel Plan (Pre occupation) Detailed Transitional Travel Plan (to be received by July 2018 with updates submitted as measures are agreed) Travel Plan monitoring fee of £5,000 (monitoring to be undertaken by WestTrans) Delivery and Servicing Plan (Pre-occupation) Demolition and Construction Method Statement (pre-commencement) Detailed Construction Logistics Plan (pre-</p>	

	<p>commencement) Public Car Park Management Plan (to include transitional arrangements for the surface car park) (pre occupation) Staff Car Park Management Plan (Pre occupation) Cycle Parking Details (pre occupation)</p>	
<p>Travel Plan Officer</p>	<ul style="list-style-type: none"> • Although PTAL scoring is 6a, the local transport orbital connections for bus are relatively poor and train connections run in and out of London only. This suggests the site is not as accessible as the scoring suggests and should be reflected in the Travel Plan. Please update the Travel Plan to reflect this. • Further analysis of survey data is required in order to gain a better understanding of the travel needs of staff. For example, of the 25% that live within a 30 minute walk, how many use vehicles for business purposes during the day. Please include a full summary of the 2017 survey and provide further analysis of data. Total response rates to the survey are not discussed other than in the table of results and seem high. Please provide an analysis of postcode data in a reader friendly format and include in the Travel Plan. The data should also be used to inform and amend, where necessary, the rest of the Travel Plan, • Based on ref 1 and 2, further analysis of current staff journeys to work and during business hours is required in order to understand the needs of staff travel. Please update the Travel Plan to reflect this. • The reduction in car parking spaces is a significant amount, therefore what is the current demand for accessible parking? Please also refer to comments provided by LBH Highways. • “The Provision of 631 less car parking spaces for office use at TWP is appropriate because it has been established that a majority of those who currently drive to the offices do so due to ease of parking”. What is this based on? If this was covered in the 	<p>The applicant has provided additional information in relation to the Council Staff Survey 2017 and updated the existing TP in line with the comments. The Council TP officer has confirmed they are satisfied subject to securing details of a Transitional TP and Full office TP.</p>

	<p>staff survey, please provide response data to support this as there could be varying reasons why staff currently travel by car.</p> <ul style="list-style-type: none"> • Has this been assessed against relevant survey data? It is uncertain that a shift of - 6% will be achieved, unless there is necessary data to support this. If a percentage of staff who take the bus have child care obligations, then they are unlikely to cycle to work. Has travel distance been taken in to consideration? Please provide evidence of this and update the Travel Plan. Please include a target to reduce car usage. • Again, it would be helpful to have a summary of the survey conducted in 2017 to determine if there is support for this. • The OTPC should be in place at least 1 year prior to occupation and arrange a meeting with Travel Planners at Harrow Council once employed. Please update the Travel plan to reflect this. • Staff should be provided with travel information prior to occupation of the Civic Centre. This is to ensure a smooth transition and enable staff to make decisions about their travel options. Please update the Travel Plan to reflect this. • More Information is required on how this will be achieved, including a commitment to provide equipment for staff working from home. • Action plan: OPTC should be in place one year prior to occupation, Action plan items need to be in place prior to occupation to encourage the desired modal shift • Pool cars should be in place prior to occupation and staff made aware of arrangements for booking and general use of cars • Staff should be updated on travel developments when changes occur and not annually. 	
LBH Vehicle	No objections.	Noted.

Crossing Officer		
LBH Landscape Architect	<p>Extracts from submitted reports - comments: requirement by Secure by Design Officers :<i>Low level planting required, to a minimum of 2 metres in height</i> - agree</p> <p><u>The Wealdstone Project Consultation Statement Report notes: under Theme 9: Tree, Greenery and Landscape page 23 / 24 as attached :</u></p> <ul style="list-style-type: none"> • <i>Good quality robust, easy to maintain planting</i> - noted planting needs to be robust, easy to maintain, as well as low level, as specified by Secure by Design – agree with this proposal. • <i>Native species and edible varieties to be proposed</i> – these species may be unsuitable in this town centre location • <i>Public roof terrace – moveable flexible planters – so no planting plan developed</i> - note: the roof plan provides no information on the proposed planting. Details are required for the proposed raised beds / plant containers, irrigation system, detailed planting proposals and planting plan and management and maintenance. <p><u>Harrow new Civic Centre Townscape and Visual Appraisal Clause 5.1 number 5, 6 and 7</u></p> <ul style="list-style-type: none"> • surface treatment – small unit stone paving and cobbles to pedestrian route, street tree planting to Gladstone Way and areas of planting within the surface car park and building frontages • Lighting condition – noting the proposed exterior lighting, lamp columns, uplighting to trees and handrail lighting – welcome this approach and further detail is required. 	Noted. Comments are addressed in paragraphs 6.4.11 to 6.4.13. Any further comments will be reported via the committee addendum.
	<p>Comments on the landscape proposals</p> <ul style="list-style-type: none"> • Hard landscape paving materials – high quality granite paving materials, natural cobble stones, granite kerbs, resin bonded gravel would add value to the public realm and are welcomed. Sufficient finance is needed to deliver the proposed high quality materials on the ground. Money should be 	

reserved and ring fenced in the project, to ensure the proposed materials are retained in the detailed design and construction of the development.

- Proposed plant beds are small, particularly for areas within the Public Realm.
- The plant bed adjacent to the southern entrance ranges from 400mm to under 2 metres in width and about 9.7 metres in length. 400mm is very narrow for a publicly planted bed. The plant bed at the northern entrance is similarly small, width 1 – 2 metres x 7 metres in length. I would question the viability of such narrow planters and the possible ultimate success of the proposed planting in the planters.
- The plant selection would need to be simple and robust, not as proposed, being too complicated, with a large variety of species. The plants need to be tough and robust to withstand the pressures of the public. Refer to above notes - aims in Wealdstone Project Consultation Statement Report notes: under Theme 9. The proposed choice of plants requires simplification, since the beds are too small to ultimately accommodate several species. The variety of different plant species in each bed should be reduced, rather than a selection of species, there should be a long term strategy for the final appearance of the planting. The plants need to be tough, to resist vandalism and the daily wear and tear in the public realm.
- For the planting, as is proposed, the management and maintenance required would be too intricate and very regular, controlling the large species, such as *Viburnum bodnantense* 'Dawn'. Ultimately, a couple of these proposed larger plant species such as *Cornus alba*, *Amelanchier lamarchii* would grow large and more than fill the bed. Some of the perennial plants wouldn't be sufficiently robust and are likely to struggle to survive and require regular replacement. The proposed plantings would be contrary to the Wealdstone Project Consultation Statement Report, noting the need for robust and easy to maintain

planting.

- The proposed planting in the car park needs to be simplified, with much tougher type of plant species selected. The detailed design for the planting will require review and amendment. The cars in the car park would be highly visible and unattractive. Many more trees should be proposed, to soften the parked cars, enhance the biodiversity and provide street scene impact. Refer to my previous comments, in the attached email dated 24th November 2017.
- Car park – many more trees are required. There is space in the central bed for four trees and more trees around the edge of the car park.
- Roof garden – detailed design proposals required for the street furniture and planting. The containers should be sufficiently substantial to support planting without rapidly drying out. The planters should be purpose made from a manufacturer or constructed from tough, robust material. Irrigation may be required. Management and Maintenance will be intensive and there would need to be a commitment to this. It is noted that the planters are to be moveable – I would question if in reality, this would happen, and how realistic this would be. Careful consideration would be required for the detailed design and material selection. Has there been any consultation / detailed consultation about the desire for raised beds for food growing? Need to be sure that the communal growing beds would be of interest to and taken up by the Harrow Council employees. What would be the fall-back position if the communal growing beds weren't successful and fell into disrepair. A formal management, maintenance and plant replacement regime would need to be in place for the raised beds.
- Car park proposes a coloured curvy lines design across the car park and the public realm. So few car park spaces have been allocated (57 surface level), making the car park in high demand and for the majority of time these lines would be covered by parked

cars and have no particular use or impact.

- The parallel curved appear to cross over onto the footpath surface, being over fussy, spoiling the high quality natural stone surfacing. Would these lines be painted over the natural stone paving, and if so, how appropriate is this? and cause any confusion for pedestrians, cyclists and visually impaired?
- Drawing GA P 3001P Public Realm – Proposed Sections - Section AA showing elevations of pedestrian barriers and handrails on steps. Consideration should be given in the detailed design to reducing the heavy appearance and lighten up and if possible reduce the extent and numbers of handrails and barriers, reducing the visual impact and improving the overall aesthetics.
- Note ramps, steps and barriers at both southern and northern entrances, Drawing GA P 4001P Rev B Public Realm – Proposed Sections North and South entrances. Southern side of the new Civic Centre – the building entrance is dominated by the steps and ramps along the frontage. Could this be redesigned to open the entrance area up creating a more welcoming entrance. The drawing shows quite heavy looking barriers and handrails, again these need to be much more lightweight, open and flowing. Six handrails on the southern side steps, the number of handrails could easily be reduced, and this will open up the steps. Access ramps for the public building will be intensively used, and as proposed are too narrow, with constricted spaces, measuring about 2 metres in width running up to the southern and northern entrance. The ramps should be redesigned if possible to be more generous, open and welcoming and possibly incorporated within the stepped access. The proposed steps appear to be steep, - the levels on the steps could be reduced, with a generous width and welcoming space arrival space allocated, enabling shallower risers and deeper more generous treads, which would be much easier to use and more suitable for an external space.

	<ul style="list-style-type: none"> • Bespoke street furniture – this would be subject to a detailed design review to assess the appropriateness of custom made seating and play features. • Commitment to the future a high standard of Management and Maintenance is critical and essential. Sufficient money must be allocated to enable and ensure successful high quality hard and soft landscape. • It is disappointing to note the loss of the two high quality hornbeam trees, with street scene impact, to the south east corner of the site are to be removed. <p>If you are minded to approve this application the following hard and soft landscape conditions would be required:</p> <ul style="list-style-type: none"> • Landscaping to be Approved • A landscape implementation programme • Boundary Treatment • Levels • Landscaping Scheme – Implementation and implementation programme, including a period of 5 year period for replacements of soft landscape • Lighting – including details of exterior lighting, lamp columns, uplighting to trees and handrail lighting – or partly contain within the landscape condition • A long term Landscape Management Plan and Landscape Maintenance over a 5 year period for the whole of the proposed development to ensure the future success of the development, including the long term aims and objectives for the communal spaces and mews courtyard type area, roads and parking area. 	
LBH Biodiversity Officer	<p>Whilst the ecological report shows that the existing site to be of relatively little interest, the proposed mitigation is inadequate and addition measures should be required by condition. Justification for the following is provided by the NPPF, by the existing London Plan and proposals in the new draft London Plan and the proposed London Environment Strategy, as well as by the new Twenty Five Year Environment Plan for England and Harrow Policies DM20</p>	<p>Please refer to response submitted by the applicant at paragraph 6.8.15</p>

and DM21.

Whilst more trees will be planted than will be removed, the value of the existing, established trees will be much greater.

- A species-rich green/blue roof treatment should be added to the design. This will add considerably to the green surface area of the development site and its surroundings and is something which should be strongly encouraged within the neighbourhood. This also represents an opportunity for the Borough to set a positive example.
- Rather than two (unspecified) boxes for house sparrows to be attached to trees that have yet to be added to the site it should be conditioned that 3 Schwegler SP1 House Sparrow Terraces be installed on or (preferably) incorporated within the fabric of the new building at the level of the second storey, 2 standard Schwegler woodcrete tit boxes or bird bricks should be installed either within the trees or on the building. Additionally 5 Schwegler swift boxes should be incorporated within the fabric of the building or installed on its exterior.
- The planted areas and green roof spaces should include invertebrate shelters – their design to fit in with the character of their planted areas.

All details of the above to be agreed with the borough ecologist prior to demolition of the existing building.

Additional conditions should reinforce the proposals concerning the timing of works and possible disturbance and the handling of non-natives presently found on site.

Queries/comments

- The minimalist nature of the proposed ecological enhancement is decidedly disappointing. Opportunities should be sought to add ecological value within the urban realm.
- Hard-surfacing appears to predominate.

	<p>Is there an opportunity to increase the extent of the planted areas?</p> <ul style="list-style-type: none"> • Consideration should also be given to the incorporation of green walls to a height of 1-2 storeys along different sections of the development. 	
<p>Additional Biodiversity Comments</p>	<p>Whilst some simple 'discounting' over a short period (c. 5 years) is reasonable, a simple count of the before and after number of trees is not appropriate, nor is any evaluation of what their value might eventually be.. The trees to be lost are established specimens of varied condition and type which presently have a greater value to local biodiversity.</p> <p><i>The increase in numbers is welcome but will not provide adequate mitigation in itself. The applicant needs to demonstrate that the proposal will be meeting the NPPF's net benefit requirement.</i></p> <p>The applicant will need to demonstrate that they are meeting London Plan requirements re green roofs/walls.</p> <p>If other elements of the intended use preclude more extensive biodiverse roof treatments, gain will need to be secured elsewhere.</p> <p><u>Young</u> trees won't provide nesting opportunities for many species. Therefore, with the existing proposals nest boxes will be required as part of the mitigation.</p> <p>House sparrows are unlikely to nest in trees even in boxes for their needs. They are more likely to be found in dense or in boxes on buildings/under roof eaves, or in thick ivy growth on buildings and walls. Hence the suggested for what will, in some form be required improvements to the proposals.</p> <ol style="list-style-type: none"> 1. The sparrow nest box locations would need to be selected with care but there appear to be options where there would be no adverse interactions. There would seem to be no issue with the swifts 2. The collision of birds with windows can 	<p>At the time of writing this report officer are awaiting further comments from the applicant. Any additional comments on biodiversity matters will be reported through the committee addendum.</p>

be a problem but this is generally with other species. Sparrows (the species highlighted in the original proposals) would be at a low level would be at a low level. There have been various projects to encourage swifts to nest in multi-storey buildings in urban areas, including at One Canary Wharf, a building which boasts not a little glass.

3. One swift nest box has a circular porch so it is easy to cut holes in tiles to fit. Hempcrete is not flammable etc.

Boxes in trees may disappear at any time. Additionally, we would need to be certain that the proposed locations would avoid the potential disturbance from visitors (highlighted as a concern by the applicant).

It should be expected that whatever proposals are adopted window strike and guano issues involving pigeons are likely to be more significant than anything proposed above.

Whilst it is accepted that security and aesthetic considerations will be important It is strongly suggested that suitable designs be included at ground level also. The car park area would seem most suitable for invertebrate shelters.

Extra trees are welcome but would urge reconsideration of extent of hard surfacing. Are there really no alternatives that could be employed?

As stated, only sections of green wall are proposed and only up to a two storey level. Green walls vary quite widely in their nature and their level of maintenance. For example, a mix of ivy, honeysuckle and clematis, would actually be ground rooted and whilst projecting 30-50cm could support a large variety of invertebrate life (and nesting sparrows). Given the constraints on the green roofs and at ground level it would have been good to have included such an option in the design. Being grown out through a supporting 'cage' would also address the vandalism issue.

There is an urgent need not to consider subtly

	<p>gridded facades but development solutions which help to address air quality, biodiversity, climate mitigation and other issues. The present design falls down on this respect. Are there sections of aspects that don't form frontages where this could be pursued?</p>	
<p>LBH Environmental Health</p>	<p>Noise With plant etc. specifications unknown, the report proposes maximum noise criteria for combined plant noise levels as affecting nearby sensitive receptors. Therefore a planning condition is recommended to ensure that plant noise meets these criteria to our satisfaction. The report also refers to the 4th floor terraced area, which might be used for various sorts of functions. In order to prevent noise problems from here, the report recommends a condition banning any form of amplified noise or music for the terrace. It also recommends limiting hours of use, I would perhaps suggest 0800 – 1800 daily.</p> <p>Air quality The air quality assessment is satisfactory for the operational phase, as is the air quality neutral assessment. There is potential for dust nuisance during the demolition and construction phases. Therefore a condition is required for an air quality and dust management plan to be developed and approved by the council before works start on site. This should clearly cross-reference the mitigation measures proposed in the air quality assessment report.</p> <p>Odour There is potential for odour from any kitchens installed in the development. Therefore a condition is required for a kitchen ventilation and extraction scheme to be submitted and approved by the council before the construction commences.</p> <p>Contaminated land A phase 1 contaminated land assessment (desk study and site walkover) has been prepared. This indicates low risks and that remedial or mitigation works are not considered necessary. However, there is always the possibility of</p>	<p>Noted. Please refer to paragraphs 6.9.22 to 6.9.41 Planning conditions are recommended in relation to noise, air quality, odour and contaminated land and lighting.</p>

	<p>finding unexpected contamination during demolition and construction operations. Therefore a condition is required for a scheme for management of unexpected sources of contamination, as set out in paragraph 5.8 of the report.</p> <p>Lighting I am satisfied with the recommendations of the lighting report, in terms of avoiding nuisance from glare and light overspill, and also for use of blinds for late-night council functions.</p>	
London Underground	No comment.	Noted.
LBH Waste Officer	I have no issues with the waste storage and collection proposal on the assumption that there will be 2 collections a week as is currently the case in the present building.	Noted.
LBH Conservation Officer	<p>This proposal is in the setting of the grade II listed Harrow and Wealdstone Station, the locally listed 36 High Street and Holy Trinity Church on the High Street and the locally listed 21 the Bridge.</p> <p>The local list description for:</p> <p>36 High Street reads: 'Built in 1905, attractive façade featuring brick pilasters with stone corbelling and a pedimented gable'.</p> <p>Holy Trinity Church reads: 'Church designed by Romeieu and Aitcheson and built in 1881, in random coursed stone'.</p> <p>21 the Bridge reads: 'Two storey red brick building with basmenet. Stone parapet with triangular pediment and consoles. Stone architraves with head surrounding doorway. Keystone, sash windows, small paned basmenet windows, brick keystones above arches. Interesting chimney stacks'.</p> <p>Paragraph 128 of the NPPF requires:</p> <p>'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their</p>	Noted.

	<p>significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary’.</p> <p>The Townscape and Visual Appraisal and Heritage Statement indicates this proposed new build would be set some way from the listed and locally listed buildings and preserve the setting of these heritage assets given the scale, design and massing in relation to these buildings and the surroundings being in keeping.</p>	
<p>Metropolitan Police</p> <p>Designing Out Crime Officer</p>	<p>I have reviewed the crime rate in the local area of the proposed development on Police.uk</p> <p>Specifically my research on Police.uk has highlighted that crime is occurring directly in the immediate vicinity of the proposed development, including serious crimes such as violent crime, burglary and motor vehicle crime, and a high proportion of Anti-Social behaviour.</p> <p>As such, serious consideration must be given to crime and anti-social behaviour at the proposed development site.</p> <p>I have met with the architect, landscape architects and regeneration scheme and have discussed the plans in detail, and the architect along with local authority displays an aspiration to achieve an SBD accreditation. I have given them specific advice at several meetings, and further specific advice can be given to the architects and developers directly and throughout the development.</p> <p>I see no reason why this development cannot achieve a Secured By Design Accreditation.</p> <p>Whilst I accept that with the introduction of Approved Document Q of the Building Regulations from 1st October it is no longer appropriate for local authorities to attach planning conditions relating to technical door and window standards, I would encourage the planning authority to note the experience gained by the UK police service over a number years in this specific subject area.</p>	<p>Noted. A condition is attached to ensure full Secured by Design Accreditation is achieved prior to occupation of the building.</p>

	<p>This experience has led to the provision of a physical security requirement considered to be more consistent than that set out within Approved Document Q of the Building Regulations (England); specifically the recognition of products that have been tested to the relevant security standards but crucially are also fully certificated by an independent third party, accredited by UKAS (Notified Body). This provides assurance that products have been produced under a controlled manufacturing environment in accordance with the specifiers aims and minimises misrepresentation of the products by unscrupulous manufacturers/suppliers and leads to the delivery, on site, of a more secure product.</p> <p>I would therefore seek to have a planning condition submitted where this development must achieve Secured by Design accreditation.</p>	
<p>LBH Urban Design</p>	<p>This is a well-designed contemporary civic centre, which will be an asset for Harrow. The scheme was presented at two design review panel sessions in May 2017 and October 2017. The scheme was well received by the panel who judged it to be strong proposal and commended the design team. The Panel made a number of suggestions, and the design team have subsequently addressed all of the major points in this application.</p> <p><u>Urban strategy and layout</u></p> <p>Peel Road and Gladstone Way are currently problematic back routes with little or no active frontage – the New Civic Centre will have a beneficial impact on the character of the surrounding public realm, improving activity and passive surveillance and generally upgrading the character of the area. Although the building is set back from the high street, the stepping out of the entrance to Canning Road will give it a strong presence on the high street and also connect it with the new public space - Trinity Square. The design team has addressed DRP concerns about the location and relationship of the two entrances, and there is now a clear strategy for two, internally linked, entrances. The Palmerston Road entrance is now more</p>	<p>Noted. Final details of materials for the building can be secured by planning condition.</p>

legible and prominent and this has also benefited the character of the South elevation.

Height and massing

Height and massing is carefully judged in relation to the context and will have minimal impact on neighbours. The New Civic Centre is prominent when viewed from Peel Road, but, although the mass is considerably higher than the existing car park, the carefully designed elevation, and high quality materials, will provide an improved outlook.

Architecture

The scheme is an example of high quality architecture. It is sympathetic to the context, whilst proposing an approach that is new and different - this is appropriate for a unique civic building. It will be a landmark for Harrow and will have a beneficial impact on the character of Wealdstone. Elevations are simple and generally well composed with high quality materials and details.

The new temple is included in outline form in this application. Given its location next to the New Civic Centre car park, this will be a very prominent building. It is important that it is a high quality building that does not detract from the setting of the New Civic Centre. Particular attention should be paid to the reserved matters application for this building, with regard to its relationship with the New Civic Centre, during the pre-application process.

Materials

Both the DRP members and design officers support the use of the green glazed terracotta cladding. However, it is noted in the application that this is the current preferred approach, but that other similarly high quality materials could also work well. A range of options should be looked at prior to discharging conditions relating to the cladding, in order to determine the most appropriate elevation treatment. While design officers support the use of a unique material to highlight the significance of the building, a simpler approach could also be successful. Further information on the façade detail should

	<p>also be conditioned e.g. depth and articulation of the façade. In addition windows, window reveals, curtain walling systems, plinth detail, external balustrades, signage and lighting will need to be conditioned.</p> <p><u>Public realm</u></p> <p>The approach to the public realm is good, and it is positive to see that the design team have incorporated recommendations from the DRP e.g. reducing the height of the plinth. Further information is needed to fully understand the detailed scheme, and this should be conditioned. The graphic treatment to the car park is interesting, but elsewhere it is recommended that the public realm detail is simple, but high quality. As above, materials and details will need to be conditioned in relation to the public realm – ground surfaces, lighting, street furniture, hand rails and railings, lighting, planting.</p>	
<p>LBH Economic Development</p>	<p>The Economic Development team welcome this application to relocate the Council’s Civic Centre facilities to Wealdstone Town Centre. Wealdstone Town Centre has been subject to a number of projects and proposals to help the town centre over the last 20 years. This relocation provides the opportunity for a step change in the function of the town centre, with an increase in footfall to the centre during the day from both employees of the council and people visiting the Council services.</p> <p>The application includes an Economic Statement that sets out the proposed benefits of the scheme to Wealdstone. It is important that appropriate measures are put in place to assess and evaluate the success of the relocation to the town centre over the coming years.</p> <p><u>Construction Training</u></p> <p>As a major application, Economic Development would normally seek construction employment opportunities on site as well as a financial contribution towards the council’s Xcite Construction Employment initiative that helps local residents find employment in construction.</p> <p>This is normally secured through a s106</p>	<p>Noted. It is recommended that details of employment and skill training be secured by condition.</p>

agreement which requires:

- (i) a training and employment plan to be agreed between the council and the developer prior to start on site and
- (ii) a financial contribution - usually secured through a s106 agreement - towards the management and delivery of the construction training programme based on the construction value of the development. This is calculated using the formula: £2,500 per £1,000,000 build cost.

The training and employment plan will normally cover

- a) employment initiatives opportunities relating to the construction of the Development and details of sector delivery;
- b) the provision of appropriate training with the objectives of ensuring effective transition into work and sustainable job outcomes;
- c) the timings and arrangements for implementation of such initiatives and
- d) suitable mechanisms for the monitoring of the effectiveness of such initiatives

However, given that this is a council application, it is understood that a s106 agreement could not be used to secure this approach. Instead, we would therefore expect

- the contractor to work closely with the council's employment and training programme (Xcite) to ensure that local residents have the opportunity to access construction and related employment opportunities that become available during the construction phase of the development, to agree an action plan (including activities to maximise local benefit, targets, monitoring arrangements and review processed)
- the contractor to work closely with Procurement and Economic Development to ensure that Harrow businesses benefit from supply chain opportunities. Tthe developer/contractor involved in the

	<p>development of the site meets the Council's Social Value targets in any contracts agreed with the Council. These targets will be included in any procurement contracts that the council let for the development of the site.</p>	
<p>LBH Lighting Engineer</p>	<p>I have now had an opportunity to review The Wealdstone Project, London Borough of Harrow- Lighting Statement Ref:40451 Rev:2 Dated December 2017 produced by PBA Peter Brett and the following points were noted:-</p> <ul style="list-style-type: none"> • Several Lighting Standards are quoted, including BS EN 5489-1:2013, BS EN 13201-2:2015 and ILP Guidance Note for the Reduction of Obtrusive Light • Numerous Luminaire Manufacturers have been indicated within the Schedule, including illuminated handrails, column mounted, wall mounted and in ground up lighting units • An substantial amount of the report comprises both luminaire intensity and polar diagrams for individual units extracted from manufacturers literature <p>Further clarification is required, as follows:-</p> <ul style="list-style-type: none"> • Lighting Design Classifications actually being proposed for each area, e.g. existing Traffic Routes, Residential, Pedestrianised Areas, including calculations and Isolux contours for overspill • Extent of adoptable area, e.g. Highways or Facility/Grounds Maintenance responsibility • Control and switching arrangements for each luminaire • Possible vandalism aspects associated with in ground mounted units <p>Where possible and depending on the level of future maintenance responsibility, we need to simplify the proposed luminaire range and/or standardise to Harrow Council's current policy, e.g. Urbis Schreder Ltd Lighting products. Typically, Axia One and Ampera LED luminaires, Dali Drivers and Telensa Ltd Control System, Fabrikat Ltd & Abacus Ltd lighting columns.</p>	<p>The applicant has advised that the Wealdstone Public Realm Implementation Guide (WPRI) has been developed in tandem with the proposed lighting strategy for this scheme. The WPRI Guide establishes the principle of 'special' lighting in high profile areas of Wealdstone Town Centre. The applicant considers that there is a strong case for incorporating some non-standard elements in the entrance steps/ramps to the proposed New Civic building and the proposed public realm areas across the site.</p> <p>Given the above, officers recommend a planning condition is</p>

	<p>This will avoid potential high costs associated with small/limited quantities of multiple manufacturers products, which are not currently utilised within the borough.</p> <p>Also, standardising future maintenance requirements for components etc.</p>	<p>secured to secure the final details of the lighting strategy.</p>
<p>Thames Water</p>	<p><u>Waste Comments</u></p> <p>Surface Water Drainage - With regard to surface water drainage, it is the responsibility of the developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated unto the receiving public network through on or off site storage. When it is proposed to connect to a public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required to ensure that surface water discharge from the site shall not be detrimental to the exiting sewerage system.</p> <p>We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges to the public sewer. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission</p> <p><i>“A Groundwater Risk Management Permit from Thames Water will be required for discharging ground water to the public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water’s Risk Management Team by telephoning 0203 577 9483 or by emailing wwriskmanagement@thameswater.co.uk Application forms should be completed online</i></p>	<p>Noted an informative is attached advising the applicant to seek permission from Thames Water to discharge to a public sewer.</p>

	<p><i>via www.thameswater.co.uk/wastewaterquality</i></p> <p>Thames Water requests that the applicant should incorporate within their proposal, protection to the property by installing for example, a non return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.</p> <p>Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.</p> <p><u>Water comments</u></p> <p>With regard to water supply, this comes within the area covered by affinity water company.</p>	
MOD Safeguarding	The MOD has no safeguarding objections to this proposal.	Noted.

5. 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. ASSESSMENT

6.1. The main issues are;

- Principle of the Development
- Character and Appearance of the Area, Townscape, Design Quality and Impact on Heritage Assets
- Landscape and Public Realm
- Residential Amenity
- Transport and Parking
- Flood Risk and Drainage
- Accessibility, Inclusive Design and Lifetime Neighbourhoods
- Trees and Biodiversity
- Energy, Sustainability and Environment
- Infrastructure and Planning Obligations

6.2. Principle of Development

Regeneration, Growth and Site Allocation

- 6.2.1 The National Planning Policy Framework outlines that the purpose of the planning system is to contribute to the achievement of sustainable development. It emphasises that paragraphs 18 to 219 of the NPPF should be taken as a whole in defining what amounts to sustainable development. Economic, social and environmental considerations form the three dimensions of sustainable development. With regard to the social role of the planning system, this is in supporting strong, vibrant and healthy communities by creating a high quality build environment that reflect the community needs and support its health, social and cultural wellbeing. In order to achieve sustainable development, economic, social and environmental gains should be sought jointly.
- 6.2.2 London Plan (2016) Policy 2.13 (Opportunity Areas and Intensification Areas) identifies Harrow and Wealdstone as an Opportunity Area and Annex 1 sets out the indicative employment capacity of 3,000 and a minimum of 2,800 additional homes.
- 6.2.3 Draft London Plan (2017) Policy outlines under policy SD1 that “Boroughs, through development plans and decisions should clearly set out how they will encourage and the growth potential of Opportunity Areas, support development which creates employment opportunities and housing choice for Londoners, plans for, provide the necessary social and other infrastructure to sustain growth,

working with infrastructure providers where necessary, include ambitious transport mode share targets and support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with policy SD10, Strategic and Local Regeneration”

- 6.2.4 With regard to Strategic and local regeneration policy SD10 identifies that Borough should seek to identify Local Areas for Regeneration taking into account local circumstances. Moreover, Development Plans, Opportunity Area Planning Frameworks and development proposals should contribute to regeneration by tackling spatial inequalities and the environmental, economic and social barriers that affect the lives of people in the area, especially in Strategic and Local Areas for Regeneration.
- 6.2.5 Local Plan Policy CS1 Part A (Managing growth in Harrow) makes clear that the Harrow and Wealdstone Opportunity Area will be the focus for regeneration, providing for a significant portion of new development in accordance with Local Plan Policy CS 2. It goes on to set out a number of policy objectives for the area.
- 6.2.6 The Harrow and Wealdstone Area Action Plan (AAP) (2013) seeks to establish the opportunity area as the ‘Heart of Harrow’, reassert Harrow’s visibility as the capital of Metro-land in London and to reaffirm Harrow town centre’s role as a Metropolitan Centre. As required by the Core Strategy, the AAP identifies and allocates sites with a combined capacity of 3,684 new homes and estimates that there is potential to deliver over 3,000 jobs across the opportunity area. These targets are reflected in the Harrow Core Strategy (2012) and the Harrow & Wealdstone Area Action Plan (2013) which seeks, within the ‘Wealdstone Central’ zone of the opportunity area, outputs of 190 jobs and 195 dwellings.
- 6.2.7 The Site is within the Wealdstone Central sub-area and Local Plan Policy AAP3 (Wealdstone) makes clear that proposals in here should (in summary):
- Strengthen the district centre, including the High Street’s vibrancy and vitality and improve the environment and identity of the Wealdstone area as a location for business and industrial activity and for family living; and
 - Contribute to a programme or urban realm enhancements based around the Station and the promotion of better east-west pedestrian & Cycle links.
- 6.2.8 In addition to the Opportunity Area Designation, the Heart of Harrow was declared a Housing Zone in February 2015 with the following key objectives:
- Increase the number of new homes, so that 5,294 homes (1,515 being affordable) are built over the next ten years;
 - Make the most of the council’s land for development, and help other public-sector partners to do the same;
 - Accelerate delivery of the council’s 600 home private rented sector programme;
 - Give local housing associations funds to help them build more homes; and
 - Renegotiate existing planning consents so that more homes are built on important sites across the area.

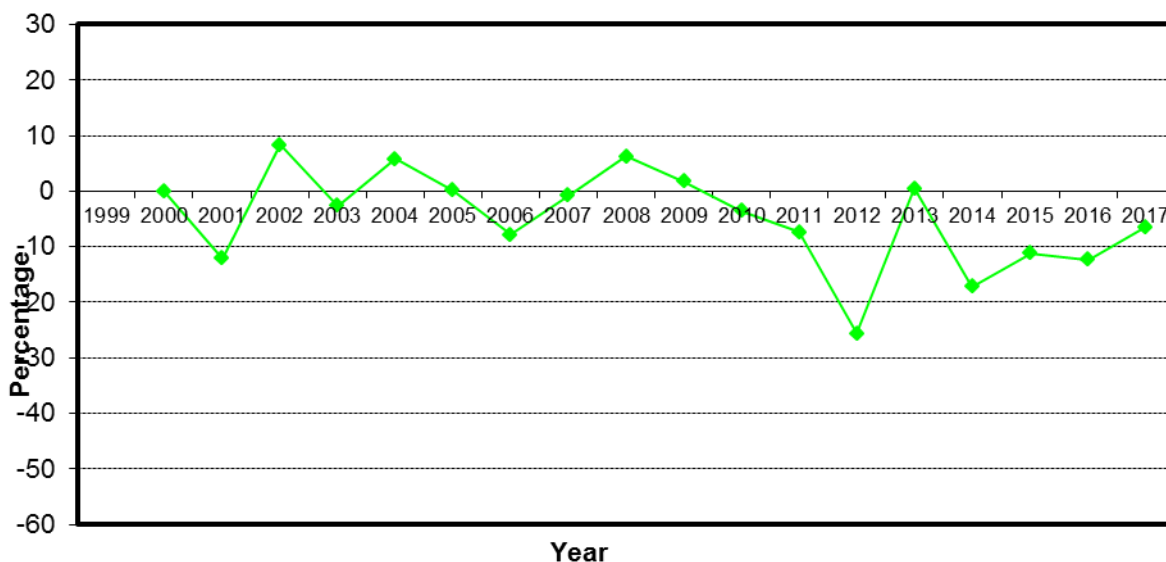
- 6.2.9 In 2016, the Council published its Ambition Plan up to 2020. This sets out the following three priorities: Build a better Harrow; Be more business-like and business friendly and Protect the most vulnerable and support families.
- 6.2.10 The Plan makes clear that in relation to the 'Build a better Harrow' priority, the Council is committed to developing a thriving, modern, inclusive and vibrant borough and refers to the £1.5million grant from the Mayor's London Regeneration Fund to contribute towards the regeneration of Wealdstone by helping to create new jobs, work spaces for creative businesses and a new public square, making Wealdstone a place people are proud to live and work in.
- 6.2.11 The Plan commits the Council to deliver a new Civic Centre in the heart of Wealdstone, providing the catalyst for total regeneration of this part of the Borough, with the ambition of moving in to a new Civic Centre by 2019.
- 6.2.12 In September 2015, the Council's Cabinet approved a 'Building a Better Harrow' Delivery Programme for building a smaller and more efficient Civic building in Wealdstone Town Centre at no net cost to Harrow taxpayers and for developing the existing Civic Centre site. The Council appraised all viable options for the future of the civic centre including; do nothing, refurbishing the existing building, renting or purchasing an office building or building a new civic centre. In total, the following six potential new-build site options were considered:
- Existing Civic Centre site;
 - Greenhill Car Park, in Harrow;
 - Peel Road Car Park;
 - Byron Leisure Centre;
 - Gayton Road; and
 - Harrow Arts Centre.
- 6.2.13 The Greenhill Way Car Park site in Harrow is identified as Site 13 in the Harrow and Wealdstone Area Action Plan (2013) and is allocated for mixed-use development, including civic/community/cultural uses. However, the 'Building a Better Harrow' Delivery Programme identified that it would be financially unviable to locate a new civic building on this site and maintain a level of car parking that is necessary to maintain the viability and vitality of Harrow Town centre. Furthermore, the site appraisal concluded that building a new civic centre in Wealdstone would bring benefits to the town centre's economy, including investment, new employment, housing, public realm improvements, new space for community activities and a boost to local businesses, including independent traders and high street shops and this was a major consideration in choosing this site over the previously identified Greenhill Car Park site. It should be noted that for appraisal purposes, it was assumed that the Peel Road Car Park option included 130 car parking spaces and approximately 35 homes. The application scheme makes provision for a total of 95 car parking spaces and no homes (although it includes the assembly of a site that could accommodate around 80-100 homes in the future).

- 6.2.14 In addition to site 13, the Harrow AAP also considers the possible retention of existing civic centre at site 9 where the building is currently located. However, the Council is currently pursuing the comprehensive residential led mixed use redevelopment of this site and the proposals do not include a civic centre.
- 6.2.15 The district centre of Wealdstone is centrally located within Harrow and has the highest concentration of industrial estates and business designated land in the borough. It has a strong industrial legacy including manufacturing firms such as Whitefriars Glass, Kodak and Winsor & Newton. The town centre offers a wide range of local shops and community venues. The Wealdstone Centre on the ground floor of Premier House includes a public library, health centre library and several community organisations. The Holy Trinity Church is a key landmark. Harrow and Wealdstone station is a major transport link – 14 minutes to Central London. The only public open space outside the Holy Trinity Church offers a poor quality paved area with a few benches increasingly occupied by rough sleepers. The high street contains a number of empty units.
- 6.2.16 The applicants' supporting planning statement provides details on a number of social and economic characteristics of the Wealdstone Area including figures from Census data and the Harrow Vitality Profiles. The Harrow Vitality Profiles (HVPs) contain a range of statistics, which build-up a picture of Harrow, its people and the environment at a snapshot in time. The latest edition (2011-13) contains over 100 different indicators, with an enlarged.
- 6.2.17 Wealdstone Town centre is located within the Marlborough Ward. Similar to Harrow generally, the area is ethnically very diverse. A third of residents are aged under twenty-five. One third of young people are unemployed. Wealdstone is the most deprived ward in Harrow and in the bottom 20% in the country for Income affecting children. The town centre suffers from a high fear of crime, drug dealing and is frequented by Harrow's largest street gang. Residents say they see it as a no-go area after dark. It reports low levels of social cohesion – 25% of residents say they do not get on together. Only 41% of respondents in Wealdstone had a sense of belonging - considerably below 67% of respondents in neighbouring Hatch End.
- 6.2.18 The submitted report identifies that Wealdstone has a strong industrial past but it has suffered from long term economic decline and is underperforming relative to the rest of Harrow. From 1981 to 2013 there has been an estimated loss of 6,100 jobs (55%) (Census 2011, BRES 2013) This has included the closure of Winsor and Newton, White friars Glass, and the Hamilton Brush Company, and the recent closure of the Kodak site. Perceived access constraints and competition from well-established industrial locations at Park Royal, Wembley and the M25 Corridor makes Wealdstone unlikely to attract new, large industrial uses.
- 6.2.19 Wealdstone is a designated District Town Centre in both the Local Plan and London Plan. However, it has seen a decline in more recent years and is currently underperforming and has a limited retail offer, which is dominated by discount shops, provides mainly for local people and does not attract shoppers from further afield

6.2.20 The centre’s public realm is considered to be functional but not of high quality. While traffic calming across much of the High Street has helped pedestrian movement within the town centre, there is constrained pedestrian movement east and west of the High Street, severely restricting the area’s engagement with the adjacent residential areas.

6.2.21 The applicant has also provided data from a Council survey information from April 2017 and GLA 2016 Health Check data which reveals the following key statistics:

- 170 ground floor units, with a combined floorspace of approximately 25,770sqm.
- Retail (A1) occupies the majority of the floorspace (approximately 57%), with the next largest occupier of space is community (D1) (approximately 8.6%) and the third largest being cafes/restaurants (A3) (approximately 7.9%).
- Relatively small amount of comparison retail (clothes, appliances etc.), with only Kingsbury and North Harrow town centres having proportionately less comparison space.
- Vacancy rates were approximately 7.7% (by floorspace) compared to a borough average of 4.5%.
- Between 2013 and 2016, planning permission had been granted for an increase in Financial/professional services (A2) (+ 568sqm), but the loss of office (B1) (- 847sqm), drinking establishments (A4) (-738sqm) and general industrial (B2) (- 540sqm).
- Daytime footfall in the town centre has improved in recent years and is approaching the level seen in 2000 (see graph below).
- Despite day-time footfall recovering, the night-time economy is weak – with few high-quality eating or drinking places.
- Nefarious and criminal activity on and around the site, most notably the existing pedestrian route between Premier House and No. 36 High Street.



6.2.22 The applicants have identified 12 overarching regenerative benefits of the proposed development as follows:

1. Facilitating the redevelopment of the existing Civic Centre/Poet's Corner site (AAP Site 9);
2. Providing a new high-quality headquarters for the Council next to the existing Wealdstone Centre, thus maintaining co-location between public and voluntary sector partners;
3. Complementing the other Wealdstone Regeneration Projects (refer to regeneration section of the appraisal) and helping to transform the economic performance and quality of life in Wealdstone and helping the town centre achieve its full potential;
4. Providing a significant increase in office floorspace and employment in Wealdstone Town Centre, more than compensating for the approved loss of office floorspace at Premier House, and introducing around 735 workers daily into the town centre to support local businesses during the working week;
5. Providing publicly accessible toilets (during new civic opening hours) to replace those that were closed in 2014 due to persistent anti-social behaviour and misuse;
6. Re-establishing Peel Road across the site and creating an east-west connection through Wealdstone Town Centre between the Kodak site to the west and the Byron Leisure Centre site to the east;
7. Creating a high quality public realm and improving pedestrian activity in the area – thereby complimenting the proposed Wealdstone Improvement Scheme and reducing crime and the fear of crime;
8. Assembling land to provide sufficient car parking to safeguard the vitality and viability of the town centre – with an additional 30 car parking spaces being made available on weekday evenings after 8.30pm and on Sundays and Bank Holidays;
9. Providing a new, larger place of worship for the ISCC;
10. Providing employment, skills and training opportunities, including apprenticeships during the construction phase, thereby addressing income deprivation, barriers to employment and skills shortages;
11. Providing tender opportunities to local contractors and developing the local supply chain; and
12. Subject to ensuring satisfactory alternative visitor car parking here or elsewhere in the town centre, creating a potential future housing site, which could be allocated as such in a refreshed Area Action Plan.

- 6.2.23 The application is also accompanied by an Economic Statement which goes into further detail regarding the regeneration benefits of the proposed development, including: details of new jobs that would be created and community benefits that the proposed development would deliver. It also references the regeneration strategies and plans that lie behind and are supported by the proposal.
- 6.2.24 The Council's Regeneration Strategy was agreed in December 2014 and further developed in September 2015. Programme level funding was agreed in May 2016 and revised at Cabinet in January 2017. The Strategy runs to 2026 around three core principles of Place, Communities and Business
- 6.2.25 The proposed regeneration strategy for the Heart of Harrow Opportunity Area is based on a 1.75Bn investment programme for in order to deliver 5,500 new homes, two new schools, around 3000 new jobs and a district heating network to major site sites.
- 6.2.26 In addition to the civic centre proposals, there are a number of other key regeneration projects currently being proposed around Wealdstone. The applicants supporting Economic Statement outlines that the Council has developed a Community Impact Model (CIM) to identify the likely costs and benefits associated with its broader regeneration programme, including the Wealdstone Project. This draws on a range of data sources and industry standard metrics to estimate the likely economic outputs from each proposed regeneration scheme in the programme, based on a number of themes. The estimated relevant outputs for the Wealdstone Project are set out below:
- **Local Added - £1,028,768**
This is the sum of all benefit factors (converted to £'s) created by the construction and occupation of the project(s).
 - **Long term persistence - £7,220,538**
This is calculated based on the type of benefit realisation, long-term discount rates (3.5%) and length of persistence of the £ benefit(s) to the locality of the project over a period of 10 years.
 - **Apprenticeships – 12**
This is calculated for the construction phase, based on the average number of apprentices per £ investment.
 - **Benefits claim reduction – £145,436**
This is calculated using New Economy methodology and takes account of deadweight, lag and persistence. The calculation is applied to number of apprentices likely to remain in work after construction activity and the proportion of new local jobs being awarded to those claiming Job Seekers Allowance and other benefits.
 - **Benefit from Skills training – £67,652**
This is calculated from the number and proportion of apprentices likely to achieve qualification and the level of qualification.

- **Benefit to local businesses - Positive impact on Wealdstone Town Centre**
The total number of people for which the New Civic building will be their principal place of work would be around 1,200. However, taking account of mobile working and absenteeism, the number of officers working in the building on an average week day is expected to be 735. Whilst the proposed New Civic building would include a staff canteen, it is still reasonable to assume that locating the building in the heart of Wealdstone Town Centre would result in some increase in spending by staff and visitors to the New Civic in local businesses (cafes, shops, financial services etc) during the working week – at lunch time and before and after work.
- **Public realm value added - £805,000**
This is calculated using a multiplier (midpoint of cost benefit) with the benefit being assessed based on square metres created and the estimated cost of public realm improvements. N.B. The proposed scheme includes transforming around 2,800sqm of public realm space at a cost of around £2.6m by way of new high-quality surfaces, landscaping and lighting.
- **Construction jobs created – 32 FTE equivalent**

- 6.2.27 The capital construction cost estimate has been divided by an average turnover per job metric for the construction sector in the appropriate region (extracted from the appropriate BIS Business Population Estimates), to estimate the gross direct and indirect job years that could be supported through the investment. It has been assumed that 10 construction job years are equivalent to 1 Full-Time Equivalent (FTE) job. As no investment would be made in a Reference Case scenario, all construction related effects can be considered as additional to the scheme.
- 6.2.28 In addition to the above stated potential economic benefits, it is also recognised that the proposed alternative location for the civic centre would facilitate the redevelopment of the existing civic centre site on Station Road and would enable 900 homes (including at least 400 build to rent units to be retained by the Council), a new school, commercial and community space and a high quality public realm to be brought forward. It is anticipated that an application will come forward for this proposal in Spring 2018.
- 6.2.29 Officers acknowledge that the site is not identified as an Opportunity site in the AAP (2013) for civic functions, unlike sites 9 and 13 as discussed above. Nevertheless, the site does lie within an Opportunity Area and District Town Centre where London Plan Policy 2.13 and Local Plan Policies CS1 and AAP3 strongly support development to be located. Moreover, the location of the development would benefit from a highly accessible location. Having regard to the potential regeneration and economic benefits discussed above, officers consider that the proposed location of the Council's headquarters on the subject site offers significant regenerative benefits in one of the most deprived parts of Harrow, including the town centre's economy, additional investment, new employment, housing, public realm improvements, new space for community activities and a boost to local businesses, including independent traders and high street shops. It is considered that the proposal is fully aligned within the development plan for Harrow including the emerging Draft London

Plan (2017). As such, it is concluded by officers that the regeneration benefits of the proposed location coupled with its highly accessible location and the positive Council intervention to utilise the subject site, thereby releasing the existing site for significant development, provide compelling reasons to justify a departure from the adopted plan with regards to the previously identified sites for the civic centre (AAP site 13 and 9) in the Harrow and Wealdstone Area Action Plan (2013).

Town Centres and Office Development

- 6.2.30 London Plan Policy 2.15 (Town centres) (Annex 2) identifies Wealdstone as a 'District Centre' with a night time economy of more than local significance and a location where some office provision could be promoted as part of wider residential and retail/leisure mixed use development. The policy makes clear that town centres should provide the main foci beyond the Central Activities Zone for commercial development and intensification (including residential development), the place where goods and services are located and (together with local neighbourhoods) the main foci for most Londoners' sense of place and local identity within the capital.
- 6.2.31 In respect of town centres, Draft London Plan (2017) policy SD6 makes clear London's varied town centres and their vitality and viability should be promoted and enhanced as: strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night time economy, tourism, civic, community social infrastructure and residential development and should be the main focus for Londoners sense of place and local identity in the capital.
- 6.2.32 London Plan Policy 4.7 (Retail and Town Centre Development) states that the scale of proposed retail, commercial, culture and leisure development should be related to the size, role and function of the town centre. London Plan Policies 4.8 (Supporting a Successful and Diverse Retail Sector and Related Facilities and Services) and 4.9 (Small Shops) encourage local facilities/services, markets and small shops as part of vibrant, diverse retail sector. The importance of diverse retail and related activities is amplified further in the Mayor of London's Town Centres SPG (2014).
- 6.2.33 London Plan Policies 4.2 (Offices) and 4.3 (Mixed use development & offices) support the renewal and modernisation of London's office stock in viable locations, including those town centres where offices are encouraged – which includes Harrow and Wealdstone.
- 6.2.34 Local Plan Policy CS1 L (Overarching Principles) directs proposals for convenience retail, and non-major comparison retail, commercial and leisure development to district and local centres, where they are compatible with the role and function of the centre.
- 6.2.35 Local Plan Policy AAP 3 (Wealdstone) requires development within all three Wealdstone sub-areas to strengthen the district centre including the High Streets vibrancy and vitality, and to improve the environment and identity of Wealdstone as a location for business and industrial activity, and for family living.
- 6.2.36 Local Plan Policy DM32 (Office Development) supports proposals for new offices where the scale of provision is appropriate to the role and function of the town centre

and Local Plan Policy DM 41 (Evening Economy) supports proposals which enhance the evening economy of town centres.

- 6.2.1 Policy DM 40 of the Harrow Development Management Policies Local Plan states that “Proposals for mixed use development in town centres will be supported. The appropriate mix of uses will be considered having regard to: a: the role and function of the centre, b: the need to make efficient and effective use of previously developed land, c: the need to re-provide certain uses on the site in accordance with other policies; d: the compatibility of the uses proposed; and e: any other planning objectives considered to be a priority for the area”.
- 6.2.2 The proposed New Civic offices and associated civic facilities and replacement ashram temple are ‘main town centre uses’ and are of an appropriate scale for Wealdstone District Town Centre. The site is ideally located to make the most of sustainable transport networks with the adjacent Harrow and Wealdstone rail station and cycle routes adjacent to the site. The proposal would also provide significant benefits to the evening economy through increased activity from office workers during the evenings and other members of the community participating in other social and public functions taking place in the building in the evening and at weekends. Additionally, the proposed surface car park would provide sufficient car parking to support the vibrancy, vitality and viability of the town centre, whilst encouraging sustainable modes of travel and providing opportunities for occasional other meanwhile town centre uses, such as market stalls. Given this, the proposed development officers consider the proposed development would accord with London Plan Policies 2.15, 4.2, 4.3 and 4.7 to 4.9. and Local Plan Policies CS1, AAP3, DM32 and DM41 and guidance in the Mayor’s Town Centres SPG.

Loss of Peel House Car Park and Gladstone Way Surface Car Park

- 6.2.3 Policy 6.1 (Strategic Approach) of the London Plan states that the Mayor will work with all relevant partners to encourage the closer integration of transport of development by (amongst others) encouraging patterns and nodes of development that reduce the need to travel, especially by car; supporting development that generates high levels of trips at locations with high public transport accessibility and supporting measures that encourage shifts to more sustainable modes and appropriate demand management. Policy 6.13 of the London Plan 2015 outlines the importance of striking an appropriate balance between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.
- 6.2.4 The proposed redevelopment would result in the loss of 284 car parking spaces in Peel House Multi storey car park and at the Palmerston Road Surface Car Park. Of these, 103 spaces are reserved for business permit holders, leaving 181 general public spaces for town centre users. This would reduce to 69 (57 proposed for the surface car park) and 12 on the corner of Canning Road and George Gange Way (approved under planning permission P/4023/17), resulting in an overall net loss of 112 general public spaces.

- 6.2.5 The submitted Transport Statement notes that the Peel House car park is well used during events at Premier Banqueting Suite in House, which usually occur at a frequency of once or twice a week and generally in the evenings. The report also notes that the Peel House multi storey car park is locked and unavailable for public use after 830pm Mondays to Saturdays and not at all on Sundays and Bank Holidays and that only the current surface car park (27 spaces) is available for public use outside of these hours.
- 6.2.6 Premier Banqueting London Limited, which operates from the first floor of Premier House, currently takes advantage of its close proximity to the visitor car parking on the site – which enables guests attending weddings and other large events to come by car. Indeed, Premier Banqueting has an arrangement with the Council whereby it meets the overtime costs of staff to enable Peel House car park to be open for its guests outside of the public opening times outlined above.
- 6.2.7 The Transport Assessment (TA) details a car parking survey for the existing car parking provision on the site which was conducted in May 2017. The results of the survey showed that Palmerston Road car park has a higher number of vehicular arrivals compared to Peel House, even though it has less capacity. Palmerston Road car park has a high turn over where vehicles stay only upto an hour or just over (on Sunday). The report also identifies that the disabled bays on Gladstone Way are also used by vehicles for short lengths of time of between 25 and 40 minutes.
- 6.2.8 The survey within the TA also presents the arrival times and corresponding duration of stay of vehicles at the three parking facilities during the week. The results show that the users of Peel House generally have a longer duration of stay. Although the tariffs for both the Peel House and Palmerston Road car park are the same, it can be determined from the survey data that the surface level car park is generally occupied by short stay users while Peel House is used by those who require a longer stay, such as for commuting or business related.
- 6.2.9 As noted in the response from the Councils Highways Authority, the proposed net loss of visitor parking is likely to have a negative effect on local business and in particular Premier Banqueting facility. The applicant has outlined that the Council is in discussion with Premier Banqueting London about providing access to other nearby car parking facilities under similar arrangements, particularly during the construction phase. At the time of writing this report, the Council has reached an agreement in principle for the banqueting suite to use the car park at the current civic centre during the construction phases. However, officers also consider that this is a highly accessible location in terms of public transport (with a PTAL of 6A, 'Excellent') and local business will have sufficient time to adjust to the proposed level of visitor car parking. The proposal would also help encourage visitors to use public transport and/or arrive by taxi.
- 6.2.10 Furthermore, It is recognised that the proposed surface level car park is expected to have the same opening hours as the existing surface level car park, meaning that there would be an additional 30 car parking spaces available for visitors to the town centre after 6.30pm during the week and on Sundays and Bank Holidays (42 if the proposed 12 spaces on the corner of Canning Road and George Gange Way are

counted). So, whilst there will be an overall significant loss of visitor spaces, there will actually be an increase in the number of spaces at certain times of the day and week which has the potential to be beneficial to the Wealdstone night time economy by helping to attract high-quality eating and drinking places, as well as providing parking for people attending/visiting evening meetings in the New Civic building.

Loss of Business Parking Permits

- 6.2.11 At present, there are 103 parking permits granted to businesses located within the development site for parking spaces within the Peel House car park. Of these 22 are allocated to existing business units on the upper floors of Premier House. However, as noted in the submitted Planning Statement, officers recognise that approval has been given for conversion of these units to housing, negating the need for business permits and the London Borough of Harrow has now terminated all of these permits. Additionally the applicant notes that 40 of the business permit holder spaces will be relocated to the Harrow Depot Site, following the redevelopment of this site under planning permission P/4767/17. Taking this into account there would be a net loss of business parking permits of 41 spaces. Nevertheless, although this loss is regrettable it is reported that only 17 of these permit spaces are currently taken by businesses in Wealdstone Town Centre. As such, the impact on Wealdstone town centre would not be significant.

Town Centre Parking Requirement

- 6.2.12 The TA submitted with the application identifies that the findings of the 'Wealdstone Town Centre Study (Draft 5.0) conducted by Atkins (25th September 2017) showed that there is a current average requirement of 60 parking spaces to cater for existing demand for town centre use. In addition to the 57 spaces included within the proposals, the Council has secured planning permission for the provision of 12 pay-and-display spaces on the former 'Magic Carwash' site, on the corner of Canning Road and George Gange Way. Together, this would provide 69 public spaces, more than the identified need. As such, the proposal to deliver 57 surface parking spaces within the application site for town centre use is considered to be acceptable.

Loss of Parking during the construction phase

- 6.2.13 The proposed demolition and construction works and associated temporary loss of all existing visitor car parking facilities within the site would have a negative effect on the vitality and viability of the Town Centre. However, it is expected that 12 spaces on the corner of Canning Road and George Gange Way will be provided before the existing on-site car parking is lost – offering some mitigation. In addition, the Applicant will seek to minimise this by carefully managing demolition and construction activities and re-providing visitor car parking as soon as possible. To this end, the planning application is supported by a Framework Construction Logistics Plan (CLP). Should approval be granted planning conditions requiring a further detailed CLP(s) and Environmental Construction Management Plan(s) can be secured to manage activities.

6.2.14 Overall, it is considered that sufficient levels of town centre visitor parking spaces would be provided for Wealdstone Town Centre use. The proposal would also encourage more sustainable modes of travel in a highly accessible location. As such in view of the above findings, it is considered that the loss of the existing parking spaces at the site is acceptable in principle. The loss of parking spaces is further reinforced by the significant regeneration benefits the scheme including an enhanced night time economy, improved public realm and east west connectivity and significantly enhanced vibrancy and vitality of the High Street as discussed in details above.

Development and Flood Risk

- 6.2.15 The NPPF (2012) emphasises that... “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest flood risk, but where development is necessary, making it safe without increasing flood risk elsewhere and local plans should apply a sequential risk based approach to the location of development to avoid flood risk to people and property and manage any residual risk, taking account the impacts of climate change, by applying the Sequential Test and if necessary, applying the Exception Test and furthermore using opportunities offered by the new development to reduce the causes and impacts of flooding” (paragraph 100). Paragraph 101 of the NPPF explains that “development should not be allocated or permitted if there are reasonably available alternative sites appropriate for the proposed development in areas with a lower probability of flooding”.
- 6.2.16 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)*”.
- 6.2.17 Core Policy CS1V outlines that with regard to applying the sequential test, other than allocated sites and sites within the APP (2013), the area of search for sites will be determined by the functional requirements and likely catchment of the development.
- 6.2.18 Core Policy CS 1 U of the Harrow’s Core Strategy (2012) aims to achieve an overall reduction in flood risk and increase resilience to flood events in accordance with the requirements of the NPPF.
- 6.2.19 Policy AAP 9 A requires that major development proposals on non-allocated sites in identified flood risk area will be required to undergo sequential and where relevant exception testing.
- 6.2.20 The majority of the site lies within flood zone 1 with the exception of a small part of the western side of the site which is associated within flood zones 2 and 3 and is associated with the Wealdstone Brook.

- 6.2.21 Planning Practice Guidance (PPG) Table 2 confirms the 'Flood Risk Vulnerability Classification of a site, depending on the proposed usage. The classification is subsequently applied to PPG Table 3 to determine whether the proposed development is suitable for the flood zone in which it is located and whether an exception test is required for the proposed development.
- 6.2.22 For the purpose of this assessment, the proposed office (B1) and non-residential institution (D1) use falls within the 'Less Vulnerable' classification. According to PPG Table 3, 'Less Vulnerable' uses are considered appropriate for Flood Zones 1, 2 and 3a. However, regardless of the proposed use, sections of the site are located within flood zone 2 and 3 and therefore a sequential test is required. Following guidance in PPG Table 3 'Less Vulnerable' are considered appropriate for flood zones 1, 2 and 3a uses without an exception being undertaken.
- 6.2.23 In September 2015, the Council cabinet approved a 'Building a Better Harrow' Delivery Programme for delivering a smaller and more efficient civic centre building. The Council appraised a number of options including do nothing, refurbishing the existing civic building, renting or purchasing an office building or building a new civic centre. A total of six new build options were considered across the Heart of Harrow Opportunity Area and wider Harrow area including the following:
- Existing civic centre site
 - Greenhill Car Park
 - Peel Road Car Park
 - Byron Leisure Centre
 - Gayton Road and
 - Harrow Arts Centre (located to the north west of the Opportunity Area)
- 6.2.24 In respect of the sequential test policy AAP9 of the Harrow AAP requires the area of search will be confined to the Heart of Harrow area where the proposal involves the creation of more than 50 jobs, more than 50 net homes or contributes significantly to the regeneration of Wealdstone. The applicants selected sites should have taken into account all potential allocated and unallocated sites within the Opportunity Area which could have the potential to accommodate the civic centre and are a lower flood risk than the subject site. However, the applicants' have actually only taken into consideration potential sites identified within the 'Building Better Harrow Delivery Programme' and therefore the sequential assessment has not been applied correctly to the proposals.
- 6.2.25 The Greenhill Car park site comprises site 13 in the Harrow AAP and is allocated for mixed use development, including civic, community and cultural uses. As such, this site could reasonably accommodate the new civic centre building and is located entirely within flood zone 1 and in this regard would be sequentially preferable compared to the subject site. Nevertheless, the above appraised options were discounted by the Council as it was considered that building a new civic centre in Wealdstone would bring significant benefits to the towns centres economy, including investment, new employment, potential new housing, public realm improvements, new space for community activities and a boost to local

businesses including independent traders and high street shops and this has been identified as a major consideration in choosing this site over the previously identified Greenhill Car Park site. In terms of the other sites, they are currently all subject to redevelopment proposals and are not being pursued by the Council. Notably, the Gayton Road site is currently under construction for a residential led mixed use development and is not a realistic option.

- 6.2.26 The applicant has applied the sequential approach to the application site itself. Although the proposed site is located within close proximity to the Wealdstone Brook and the redline boundary includes a small area of land within flood zones 2 and 3, all 'vulnerable' uses associated within the development are to be located in Flood Zone 1, away from the higher risk areas, within only a small section of the proposed temple in flood zone 2. However, the NPPF considers such development in flood zone 2 to be acceptable in principle.
- 6.2.27 A detailed mitigation strategy is set out within the FRA which outlines that all finished floor levels for the new civic centre will be set well above all modelled flood events at 56.0m AOD. With regard to the temple, the maximum modelled flood level is 52.822m AOD for the 1 in 1000 annual probability storm event and 52.817m AOD for the 1 in 100 annual probability storm event plus 25% climate change where the south western corner of the temple is to be located. The base ground level for the proposed temple would be 52.7m AOD approximately the same level as the existing ground level for that area. Given the less vulnerable classification of the proposed use, the siting of the building in this location is considered to be low risk, subject to any sleeping accommodation being provided 0.25m above the existing ground level and provided that access to the basement is located to the north of the building in flood zone 1 to ensure safe access and egress. A detailed flood risk and drainage strategy can also be secured as part of the planning permission, should approval be granted.
- 6.2.28 The proposals will also give rise to considerable improvements to the existing surface water drainage conditions on the application site through the provision of sustainable urban drainage techniques including the use of permeable paving, the provision of a swale as well as underground attenuation tanks. The proposals will therefore result in a reduction in potential local flooding on the site and to the surrounding neighbouring land compared to the existing situation.
- 6.2.29 As such, whilst officers acknowledge that the sequential test has not been applied correctly in this case, the risk of flooding overall is considered to be extremely low and on balance having regard to the above considerations and when considered in line with other wider regeneration benefits and urban design considerations of the proposal, the lack of a full sequential test would not be sufficient to justify a refusal within the context of the specific site circumstances on this case. Further safeguards in terms of flood mitigation can be secured by condition. Officers therefore consider the principle of the development would accord with the NPPF, Harrow Core Strategy policies (2012) CS1 U and CS 1 Z, policy AAP9 A of the Harrow and Wealdstone Area Action Plan (2013).

Outline Proposals – Proposed Temple and Community Uses

- 6.2.30 The Glossary in the Development Management Local Plan defines Community Facilities: This includes culture facilities (including arts, entertainment and sport facilities), licenced public houses, community offices and meeting places (including places of worship, libraries), facilities for children (from nursery provision to youth clubs), education (including adult education), social services, police and emergency services facilities, primary healthcare facilities (except for the use of premises attached to the residence of the consultant or practitioner), public toilets and facilities for cyclists.
- 6.2.31 The existing temple on the site would fall within this definition and London Plan Policy 3.16 (Protection and Enhancement of Social Infrastructure), Core Strategy Policy CS1 Z and Local Plan Policies DM47 (Retention of Existing Community, Sport and Education Facilities) and DM 46 (New Community Sport and Education Facilities) provide the context for considering the loss of such facilities and the provision of new facilities.
- 6.2.32 London Plan Policy 3.16 (Protection & enhancement of social infrastructure) generally resists the loss of community facilities unless the redevelopment of the site would secure an over-riding public benefit. Proposals for the redevelopment of community or educational facilities that secure enhanced re-provision on the site, or on another site which improves accessibility, will be supported. The policy is supported by the Mayor’s Social Infrastructure SPG (May 2015).
- 6.2.33 Draft London Plan Policy S1 outlines that “Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless 1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood, or 2) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services”.
- 6.2.34 Local Plan Policy DM47 (Retention of existing Community, Sports and Education Facilities) (Part A) 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 redevelopment of the site would secure an over-riding public benefit.
- 6.2.35 Part B of the policy makes clear that proposals for the redevelopment of community or educational facilities that secure enhanced re-provision on the site, or on another site which improves accessibility, will be supported.

- 6.2.36 Local Plan Policy DM46 (New Community, Sport and Education Facilities) makes clear that proposals for new community facilities will be supported where: (a) they are located within the community that they are intended to serve; (b) they are safe and located in an area of good public transport accessibility or in town centres; and (c) there would be no adverse impact on residential amenity (see Policy DM1) or highway safety.
- 6.2.37 In November 2017, In November 2017, the Council and the ISSC agreed heads of terms for an exchange of land and the provision of a replacement ashram. In short, these provide for the exchange of land ownership, the provision of suitable decant premises, so that the ISSC can continue to operate at all times pending it moving back in to a new ashram on the site.
- 6.2.38 The proposed land exchange between the ISSC and the Council will consolidate council ownership of land to the east of Gladstone Way. It is outlined that subject to identifying satisfactory alternative town centre car parking facilities, this land could accommodate a mixed-use/residential building providing between 80-100 homes in the future.
- 6.2.39 A draft copy of the legal agreement has been submitted with the planning application documents and is considered to form a material planning consideration in the determination of this planning application. The key relevant aspects of the Heads of Terms are outlined as follows:
- The transfer of the freehold interest in the existing temple site from ISSC to the Council, and the transfer of the freehold interest in the replacement temple site from the Council to ISSC, will be completed within a specified period following the grant of planning permission.
 - The Council will grant to the ISSC a lease for suitable decant premises for the period until the replacement temple is completed, with the Council meeting the associated costs.
 - The ISSC will submit a reserved matters application to the LPA no later than 12 weeks following the grant of planning permission.
 - On securing approval under reserved matters, the ISSC will appoint a building contractor to commence the construction of the replacement temple and a contractor will be appointed within a specified period after the ISSC receive reserved matters approvals for the replacement temple.
 - The Council will make available a financial contribution to the ISSC to help fund the provision of a replacement temple.
 - The ISSC will complete the replacement temple no later than the end of March 2020 (or other agreed date).
- 6.2.40 The ISSC is recognised to play an important role and function in the social infrastructure of Wealdstone and makes a positive contribution to the vitality and viability of the Town Centre.
- 6.2.41 The Council are currently in discussion with the ISSC in finding an appropriate decant facility for the existing D1 use. A decant facility is currently being considered within the existing civic centre site, which is within 1km of the site. The Local Planning Authority is in receipt of a planning application in respect of an alternative

replacement facility which is currently under consideration. However, officers consider that a planning condition could be used to secure the provision of the D1 use before the development on the new civic centre is commenced. This would ensure the temporary loss of a permanent place of worship is mitigated.

- 6.2.42 The proposed parameters for the outline element of the proposed development requires the re-provision of the ashram temple of at least the same size as the existing place of worship (321sqm), ensuring that there will be no net loss of community floorspace. The proposed parameters also allow for a significantly larger place of worship, up to 1,672sqm, which would be a welcome benefit to religious and cultural life in Wealdstone. Subject to appropriate opening hours, the intensification of such a community use in a town centre with excellent public transport connectivity and a satisfactory level of visitor car parking is appropriate and should safeguard the amenities of nearby residential neighbours.
- 6.2.43 The agreement between the ISSC and the Council has been signed and as such forms a strong legal basis for the ISSC to develop a Reserved Matters application and deliver a new temple. Moreover, both the Council and temple would be incentivised to develop the new temple because of the decant – the Council to get the land on the existing civic centre site back to progress with the intended redevelopment proposals and ISSC to have permanent facilities. The legal agreement sets out a timeframe for completion of the temple (March 2020) and this would therefore ensure that any decant into the existing civic building would not hinder the redevelopment proposals at the existing allocated civic centre site.
- 6.2.44 The existing public toilets that are located on the ground floor of the Peel House Multi-storey Car Park fronting Gladstone Way were closed in 2014 due to persistent anti-social behaviour and misuse and it is confirmed by the applicant that there is no prospect of them reopening.
- 6.2.45 Given the need to reduce anti-social behaviour and illegal activity officers agree that it would not be appropriate to include replacement unsupervised public toilets within the proposed scheme. However, the proposed new civic building will incorporate toilets on the ground floor of the building that will be accessible to members of the public during normal working hours. This will include access to a 'Changing Places' toilet, which will be suitable for people with a wide range of physical and multiple learning disabilities. As such, these will represent a significant improvement on the existing (closed) level of provision during the working week.
- 6.2.46 As such having regard to the above considerations, it is considered that the proposal would accord with London Plan Policy 3.16, Draft London Plan Policy S1 and Local Plan Policies, CS1Z and DM46 and DM47. The principle of the development is therefore considered to be acceptable in this regard.

6.3. **Character and Appearance of the Area, Townscape, Design Quality and Impact on Heritage Assets**

- 6.2.47 As outlined in paragraph 56 and 57 of the NPPF (2012), The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute

positively to making places better for people. It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

6.2.48 Policy 7.4 (B) of the London Plan requires that buildings, streets and open spaces should provide a high quality design response that has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass. Policy 7.6 of the London Plan (2016) outlines that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the widest quality materials and design it appropriate to its context. Buildings should have complimentary building materials, be of a proportion, composition, scale and orientation which enhances and defines the public realm.

6.2.49 Draft London Plan (2017) Policy D1 requires that development design should respond

- to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types forms and proportions
- be of a high quality, with architecture that pays attention to detail, and gives through consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well
- aim for high sustainability standards
- respect, enhance and utilise the heritage assets and architectural features that make up the local character
- provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water
- achieve comfortable and inviting environments both inside and outside the building.

6.2.50 Draft London Plan Policy D2 addresses the need for design scrutiny and maintaining design quality including the use of design review to assess and inform design options in addition to urban design officers' assessment.

Tall Buildings

6.3.1 The London Plan defines tall and large buildings as "...those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor". The Core Strategy defines tall buildings as any building at or over 30 metres and this definition is reproduced at the glossary of the AAP. The AAP makes a further distinction as to 'taller' buildings, these being defined as buildings that are two or three storeys higher than the surrounding building heights. The proposed New Civic building and residential tower would be in excess of 30m in height above ground and would be significantly taller than surrounding buildings.

- 6.3.2 The framework for considering the acceptability tall buildings is established by London Plan Policies (2016) 7.6 (Architecture), 7.7 (Location and Design of Tall and Large Buildings), Draft London Plan Policy (2017) D8 (Tall Buildings) and by Local Plan Policies CS 2 (Harrow & Wealdstone), AAP 6 (Development Height).
- 6.3.3 London Plan policy 7.7 outlines a number of criteria which tall and large buildings should conform to and notes that such buildings should generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport. It outlines that they should not have an unacceptably harmful impact on their surroundings and that they should only be considered in areas whose character would not be adversely affected by the scale, mass or bulk of a tall or large buildings, urban grain and public realm (including landscape features), particularly at street level, individually or as a group, improve the legibility of an area by emphasising a point of civic or visual significance where appropriate.
- 6.3.4 The Draft London Plan policy (2017) on tall buildings echoes a number of the considerations in policy 7.7 of the current London Plan, outlining that tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. In respect of visual impacts Draft London Plan policy D8 requires that the views of buildings from different distances need to be considered including:
- Long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views.
 - Mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality.
 - Immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces, there should be an appropriate in scale between the tall buildings and its surrounding context to protect amenity and privacy.
- 6.3.5 In respect of tall buildings the AAP 6 D states that “Proposals for tall buildings will only be considered acceptable if they represent ‘landmark’ buildings. Such proposals will be considered in accordance with the criteria set out in the London Plan and should: a. Be located to draw attention to locations of civic importance, major public transport interchanges; and areas of important public urban realm; b. Be of the highest architectural quality and design; c. Accord to the principles and limits set out in Policy DM3 of the Development Management Policies Local Plan: Protected Views and Vistas.

Location and Landmark

- 6.3.6 The proposed New Civic building will be approximately 31.5m above prevailing ground level – thus only just meeting the local definition of a ‘tall building’ and criteria for referral to the Mayor of London. The new offices for the Council will be located within Wealdstone Town Centre within 100m of Harrow and Wealdstone Station and in an area with excellent public transport accessibility (PTAL of 5/6a).
- 6.3.7 As noted in the submitted Townscape Assessment, the tallest part of the building would be seen approaching Wealdstone along George Gange Way, along Headstone Drive and also from the platform of Harrow and Wealdstone Station.
- 6.3.8 Officers consider that the provision of a tall building in this location within the opportunity area is appropriate. Through its scale form and architectural language, would provide a distinctive and unique visual marker and landmark within Wealdstone Town Centre and from Harrow and Wealdstone Station, a major public transport hub, thereby strengthening the legibility of the surrounding townscape and would reinforce and significantly enhance the urban character and status of Wealdstone District Centre.
- 6.3.9 Officers conclude that the proposed civic building would introduce a visually distinct and high quality Landmark in the area which would be a highly visible asset within the Heart of Harrow that would contribute positively to the legibility and identity of the area.

Scale, Massing, Townscape Effects and Locally Protected Views

- 6.3.10 London Plan Policy 7.7 states that tall and large buildings should be located in areas whose character would not be adversely affected by the scale, mass or bulk of the proposal, and that they should relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm, particularly at street level. Policy AAP6 provides specific direction as to the height, form and setting sought in respect of proposed tall buildings; namely, that they should:
- Be slender and elegant in design, tiered and stepped where necessary to further reduce bulk, and not slab-like when viewed from any direction;
 - Create a simple and legible building profile that enhances and adds visual interest to the skyline;
 - Contribute to the overall townscape, both during the day and night, and achieve a positive relationship with surrounding topographical features and buildings at all sides;
 - Incorporate a high quality urban realm fronting the tall landmark; and
 - Secure a complete and well-designed setting at street level, including active ground floor uses, and positively define the character of the public realm.
- 6.3.11 The proposed development would mediate between the scale of the generally low rise urban context, generally 2 to 4 storeys, with some taller new development of six storeys. Notably planning permission has been granted for a fifth storey to the adjacent building at Premier House (Planning Refs: P4357/17

and P/0120/17) and further residential development of transformational scale has recently been granted (subject to the completion of a legal agreement) on Palmerston Road (Planning Ref: P/1619/17).

- 6.3.12 The majority of the building will be four commercial storeys and it is considered that this will relate well to Premier House (5 Storey with permission to build an additional floor) adjacent to Gladstone Way and Canning Point, a relatively recent six storey residential development to the north of the site in Canning Road. At the south east corner of the building, the massing would increase by a further two storeys plus additional height generated from a roof top plant screen around the top of the building. The Design and Access statement outlines that the increase in massing in this location is partly to respond to the consented Palmerston road scheme and also pre-empting a potential residential building at the south east corner of the site where the surface car park is proposed as part of this application. It is considered that the rooftop plant enclosure which is continued as part of the elevation helps to create a 'crown' that differentiates the building in the wider townscape context.
- 6.3.13 Given the civic purpose of the building, an element of increased height on the building is considered in officer opinion to be visually important, ensuring the verticality of the upper storeys form a clear marker.
- 6.3.14 The proposed stepped massing would create a strong south and east façade for the purposes of urban legibility. The Design and Access Statement outlines that the setting out of the southern elevation is directly related to the pedestrian continuation of Peel Road and establishing a new and legible route from the High Street to Byron Park. Furthermore the prominence of the south elevation was considered in response to views from the A409 flyover, both on foot and by vehicle. The building is angled so that it is more likely to remain visible from George Gange Way should a residential development to the south come forward in the future.
- 6.3.15 The massing of the building has also sought to respond to more localised experiences of people encountering the building closer up. In particular, the north of the building is stepped to take advantage of the curved north edge of the site and is articulated with a belvedere at the roof terrace. This helps establish one of the main entry points to the building and responds appropriately to its siting to the rear of the Premier House so that the building is visible from the High Street. The northern entrance tower would form a terminus to Canning Road and would respond to the Wealdstone Square to the west on the opposite side of the High Street which is also proposed to be redeveloped.
- 6.3.16 The south west corner of the building would be subtly angled to follow the curve of Gladstone Way which would help create a softer approach to the building from the High Street and along peel Road and also helps form a prominent legible corner to the building.
- 6.3.17 In officers' opinion, the scale and massing of the proposed civic building would be in keeping with the surrounding context and would sit comfortably within the street scene of Canning Road, Gladstone Way and Palmerston Road.

- 6.3.18 In addition to the townscape views in the submitted Design and Access Statement, the application is also accompanied by a Townscape and Visual Impact Assessment and Heritage Appraisal (HTVA) which considers and tests a number of short range, medium range and long range views. The submitted HTVA has been undertaken in accordance with the Guidelines for Landscape and Visual Impact Assessment, 3rd edition with reference to the relevant planning policy context including the London Plan and the Local Plan including the Harrow View Assessment (2012). The assessment has been based on the Zone of Theoretical Visibility (ZTV). The ZTV is the area within which views of the proposed development could be obtained.
- 6.3.19 The TVIA considers the townscape character of the site and surrounding area; the visual role of the site in the surrounding area; the sensitivity of townscape and views to change; the scale of the change arising from the proposed development to the townscape and views, and whether the change would be beneficial, neutral or adverse including the effects of mitigation built into the design. The TVIA has analysed a total of 9 short, medium and long range views surrounding the application site. Each of the views has been considered within the context of various townscape character areas which are identified as Wealdstone High Street, Wealdstone Residential Areas, New Residential Apartments and Industrial and Business Areas.
- 6.3.20 The study identifies that the main visual receptors in the surrounding area who views or visual amenity could be affected by the development proposals include: residents immediately surrounding the site with an outlook from a main living room window towards the site. This includes residents on Canning Road and Peel Road; Motorists, their passengers, pedestrians and cyclists using High Street, George Gange Way, Canning Road, Peel Road, High Street and Headstone Drive and shoppers and people working in the town centre.
- 6.3.21 The proposed development would undoubtedly result in a high degree of change to the application site. The existing Peel House car park is considered to be a poor quality building with blank inactive frontages to the street. The existing surface car park does little in terms of its contribution to the surrounding townscape. Whilst the HTVA notes that ISSC building has some limited townscape interest, being a remnant of an earlier phase of development of the settlement, it goes on to say that due to its modest scale, simple design and latter alterations makes a limited contribution. The HTVA considers that the proposed civic building would define more active and visually interesting frontages along Canning Road, George Gange Way and Gladstone Way. It considers the entrance to the building from Canning Road is clearly expressed by the entry tower that would enhance local legibility and would form a strong visual connection with the main activity along the High Street. Furthermore, a new pedestrian link will connect the existing pedestrian route between Gladstone Way and High Street via a pedestrian crossing to Peel Road, thereby restoring the historic connection between the High Street and the residential areas to the east. Overall, the HTVA finds that there would be a major beneficial effect on the townscape character of the site itself.

- 6.3.22 With regard to the impact of the development on Wealdstone High Street Townscape Character Area, the HTVA considers the susceptibility of townscape to change to be low due to the existing low quality environment and separation of the site from the five storey Premier House. The report notes that this will decrease further if an additional storey is added to Premier House. Overall, the HTVA considers that there would be a medium degree of change to the townscape character of the area as a whole. Whilst it finds there would be notable changes to the area between Canning Road and Palmerston Road, there would be limited visibility from the High Street itself. It is further noted that the degree of change will be lessened as a result of the changing context of the wider character area, particularly in relation to the approved Palmerston Road scheme. Overall, the HTVA finds that there would be minor to moderate beneficial effect on Wealdstone High Street as a result of the enhanced active frontages to Canning Road, Gladstone Way and the new connection to Peel Road, the improved relationship with the public realm, particularly with the introduction of public and semi-public spaces on the ground floor, the enhanced new public realm and also through the use of distinctive green ceramic facades which will highlight the importance and use of the building within the town centre.
- 6.3.23 In respect of other identified character area, the HTVA considers that the impacts will be generally either negligible or minor beneficial. The new building will be a notable new element in a number of views from the eastern residential areas and there will be marked contrast in scale and form of the buildings. However, although there would be an increase in the amount of the built form seen, the improvement in the quality of the building seen would give rise to beneficial changes to the visual amenities of the neighbouring occupiers of the residential dwellings to the east. Any views from these properties would also not be direct towards the building given their north south orientation. Notably, with regard to the Wealdstone Residential Areas, the report considers that the views out of the character areas will be enhanced and in particular there will be a localised minor beneficial effect around Peel Road and Canning Road.
- 6.3.24 The visual effects of the building at night time have also been taken into account in the HTVA. The report includes various visualisation of the southern, northern and eastern facade of the building. Having regard to the existing situation, officers consider that the building will create a significant beneficial effect at night and will appear as a welcome and attractive building. Moreover, the building will contribute to the perception of safe and well lit streets, providing passive surveillance over Peel Road and George Gange Way. The lighting to the building will significantly enhance the streetscape of Canning Road, Gladstone Way and Peel Road.
- 6.3.25 Having regard to the robust testing and analysis carried out and acknowledging its conclusions, officers considered that the proposed re-development of the site would not result in any significant adverse townscape visual effects. It is accepted that the existing site is of low value and the existing building Peel House has no architectural merit and the existing ISSC building makes a limited contribution to the surrounding area. It is considered that the proposed development would respond positively to the requirements of the development plan. There are numerous locations in the surrounding area where the proposal

will lead to beneficial visual effects, including at night, by introducing a well-designed building and public realm that will enhance visual amenity, legibility and the street scene, including views along George Gange Way, Peel Road, Gladstone Way, Wealdstone High Street and Palmerston Road. The proposals would be visible from Wealdstone town centre and also highly visible from the residential areas to the east. Nevertheless, the building would be compatible with the overall character of the urban scene and would make a significant positive contribution and an appropriate identity for Harrow and Wealdstone through its architectural language. The development would be a catalyst for regeneration benefits within the Opportunity Area and would better define the frontages to George Gange Way, Canning Road and Gladstone Way, providing natural surveillance. Furthermore, the development would act as a visual marker of the approach to the town centre from a number of locations including travelling north and south along George Gange Way, west along Canning Road, Peel Road and Palmerston Road. In officers' opinion, the town centre location is capable of accommodating the scale of the proposed civic building which will create an appropriate sense of place and provide a high quality legible building with good public realm and landscaping.

- 6.3.26 Policy DM 3 of the Harrow Development Management Policies Local Plan (2013) addresses protected views within Harrow. Although the application site does not fall within a landmark viewing corridor, it does lie within a Wider Setting Consultation Area. The Wider Setting Consultation Area is an area enclosing the Landmark Viewing Corridor both in the foreground and the middle ground and the background of the Protected Vista. In respect of such areas, policy DM 3 requires that development proposals should form an attractive element in their own right and preserve or enhance the viewer's ability to recognise and appreciate the landmarks. The policy states that "*development should not harm and, where possible, should make a positive contribution to the characteristics and composition of the protected views and their landmark elements.*" It also outlines that opportunities to create new local views and vistas should be exploited through the design and layout of new development.
- 6.3.27 Harrow Weald Ridge is designated in the Local Plan as an area of special character. Local Plan Policy DM6 (Areas of Special Character) sets out criteria for the consideration of proposals affecting an area of special character. Local Plan Policy AAP8 (Enhancing the setting of Harrow Hill) calls for, amongst other things, development to form a coherent urban form that engages with and enhances Harrow Hill, form an urban silhouette that adds interest to the skyline in long range views and to and from Harrow Hill and not adversely affecting views of or from Harrow Hill and St. Mary's Church. Also relevant is the Harrow-on-the-Hill Conservation Areas SPD (2008).
- 6.3.28 The following views have been considered within the applicants supporting Townscape and Visual Impact Assessment:
- Rodborough Road Footbridge (Ridge View)
 - Wood Farm Country Park, Stanmore

- 6.3.29 The HTVA confirms that the proposed development is within the wider consultation zone of the long range views from Stanmore and Roxborough Road. The report considers that there would be no visual effect from the Roxborough Road, due to the intervening screening and consequently the proposed development would not be visible. Similarly in respect of the view from Stanmore Country park, the assessment finds that the proposed development would not be visible from this view due to the distance from the site.
- 6.3.30 Additionally officers also consider, the proposed New Civic building would not diminish the strategic value of the Harrow Weald Ridge area of special character and this will remain clearly distinguishable as the dominant topographical features within the wider landscape of the Borough. As such, the proposals comply with Local Plan Policies DM6 and AAP8
- 6.3.31 Having regard to the visualisations and analysis within the TVIA, officers are satisfied that the development would have no effect on the composition of protected views identified within the Harrow DMPLP (2013).

Architectural Quality

- 6.3.32 The elevations of the proposed new civic building have a simple grid of square windows above vertically proportioned ground floor openings with a deep reveal. The building would be clad in a light green ceramic with flat and textured surfaces. The cycle pavilion and substation would be clad in vertical timber slats. Officers consider that the rectilinear massing and detailing is appropriate and consistent with adjacent buildings.
- 6.3.33 The proposed green ceramic façade would be completely distinctive within the surrounding context. Nevertheless, officers consider this response to be entirely appropriate given the buildings civic function and role and that the materials will help reinforce identity and assist with legibility.
- 6.3.34 The ground floor of the building is proposed to be raised c. 1.4m from the predominant external ground level which is articulated externally as a crisp concrete plinth flush with the above façade and extends out at the north and south entrances to incorporate ramps and stairs to access the building. The base would establish a robust finish at street level against pedestrians and close to vehicles.
- 6.3.35 The primary gridded organisation of the building would be modified by the two primary public entrances at the north and south to be clearly legibly visible entrances. The main entrances would have extensive floor to ceiling glazing which would provide increased visibility in and from within the building. The entrances are further expressed through columns and concrete lintels which mark out the openings. The north entrance would benefit from the vertical articulation of a solid façade with a belvedere/clock tower that helps announce the civic entrance and also provides a strong visual connection with the High Street

- 6.3.36 The middle of the west façade adjacent to Gladstone Way accommodates several service functions, including access to the basement, parking, fire stair, corridor exits, the bin store and the loading area doors. In this area the robust concrete finish of the plinth is raised to frame service entrances, in particular opening reveals. Above door and ramp height, the ceramic finish of the piers and horizontal members is used as a solid façade. It is considered the architectural approach here serves to play down the prominence of the service area and responds to the need to provide a more durable finish.
- 6.3.37 The submitted drawings include large scale bay studies that illustrate key elevations in detail. The application proposals have been subject to consideration by the Design and Review Panel (DRP) who considered emerging proposals on two occasions. The DRP were strongly supportive of the proposed architectural detailing and materiality of the building. Both the DRP members and design officers support the use of the green glazed terracotta cladding
- 6.3.38 Furthermore as outlined by the Council's Urban Design officer, the applicant has addressed initial DRP concerns about the location and relationship of the two entrances, and there is now a clear strategy for two, internally linked, entrances. The proposed southern entrance would have a clear purpose as an entrance to the proposed customer hub and is now more legible and prominent and officers consider that this has also benefited the character of the South elevation.
- 6.3.39 Given the importance of the quality of the architecture and finished appearance of the proposal in making the proposed development acceptable on this site, it is considered necessary to ensure that the development is carried out to the standard promised in the application and that, as required by Local Plan policy, it maintains its attractiveness over the lifetime of the development. As such, a planning condition is recommended for the submission all detailed external materials and finishes for the buildings in order to ensure their proposed high quality appearance can be realised. Subject to this, it is considered that the proposed contemporary architecture will make significant positive contribution to the wider urban environment.

Impact on Surrounding Area

- 6.3.40 Policy 7.7 of The London Plan also requires that regard is had to the environmental impacts of tall buildings. It outlines they should not adversely affect the surroundings in terms of microclimate, wind turbulence, glare, navigation and telecommunication interference.
- 6.3.41 Having regard to the siting, scale and form of the building and relationship to surrounding neighbouring buildings, officers consider, they would not present an issue in terms of wind turbulence. GLA officers have outlined in their stage 1 response that they are satisfied the proposals accord with the principal objectives of policy 7.7 of The London Plan and have not raised any objection in this regard.
- 6.3.42 The overshadowing and noise impacts of the development have been appraised elsewhere and are considered to be acceptable. As such, the taller buildings are not considered to adversely affect their surroundings in this regard.

- 6.3.43 No information on glare has been submitted with the application. Given the arrangement of the buildings on the site and the architecture proposed with which provide a reasonably low level of glazing with deep reveals, it is considered that the risk of glare occurring from the inset taller 5th and 6th storeys of the building is insignificant.
- 6.3.44 The site is within the RAF Northolt 91.4m height and bird strike statutory safeguarding zones surrounding the aerodrome. The proposed maximum building heights above prevailing ground level are approximately 31.5m in relation to the proposed New Civic building and 14.3m for the proposed replacement ashram temple building. These are significantly below the 91.4m safeguarding height. The proposals do not include any standing water and would not attract large or flocking birds. In terms of navigation and impacts upon the Safeguarding Zone of RAF Northolt, the Ministry of Defence has been consulted on the application and has no raised any objection.
- 6.3.45 The proposed maximum building height of approximately 31.5m above prevailing ground level is not significantly taller than Premier House (as permitted to be extended) and is significantly lower than the two residential towers in the permitted Palmerston Road scheme. As such, the proposed development is not expected to have any significant impact on telecommunications interference.
- 6.3.46 Local Plan Policy DM 49 Telecommunications requires proposals for major development to make provision for communal satellite and digital television receiving equipment. The policy is considered particularly important in respect of the proposal, where multiple satellite dishes or other such apparatus could seriously harm the appearance of what would otherwise be a landmark development. However, given the proposed use of the building it is considered unlikely that there would be an unacceptable proliferation of telecommunications equipment occurring on the building.
- 6.3.47 The building would also incorporate public access a terrace at fourth floor level which would provide a social, outdoor space for Council staff and event space related to marriage multi-functional space and less formal events. As such, the proposal would also comply with London Plan policy 7.7 in this regard.

Layout

- 6.3.48 Typologically, the building has a central core with open space to the perimeter (typically 12m from the core to glazing). Floors would be connected by two stairs which are required for the fire egress strategy and a bank of lifts. A more generous stairs would be provided to the north of the building which would provide ease of movement between the levels, and community cohesion. The applicant has provided details of an indicative typical office floorplate in the accompanying Design and Access Statement which has been based on extensive stakeholder engagement. The floorplate has been designed to be as open and unobstructed as possible to maximise flexibility of use.
- 6.3.49 The proposed public ground floor is intended to be the heart of the building and will accommodate:

- A new customer services hub, providing an inclusive and accessible interface for engaging with Council services.
- Two significant civic rooms for Council meetings and events, and use by the community
- A lobby to support the office floors above
- Drop in work space for Council staff.

- 6.3.50 The current indicative ground floor layout, outlines a customer services hub located at the south of the building, accessed from Peel Road and close to the surface public parking. It is proposed that two significant civic rooms and the main entrance to the office floor above would be located to the north from Canning Road. The proposed Council Chamber at the North West corner of the building would be visible from the High Street along Canning Road. A large committee room would be provided in the north east corner of the building which would further help activate and animate George Gange Way and Canning Road. An open stair would be provided to the east of the lift core to direct staff to the main north core and provide access to a mezzanine level of support spaces and a public viewing gallery.
- 6.3.51 The proposed roof terrace at 4th floor level is primarily intended for staff and recreational use with areas to sit and rest. The terraces are also intended for occasional public and third party use, such as weddings in the function room, hiring out or other public social events.
- 6.3.52 Overall, in officers' opinion the proposed layout of the building has been well considered and would create a compact and efficient office space which would benefit from good levels of ventilation and daylight and will provide an attractive and functional environment for its intended users.

Scale, Massing and Architecture – Other Buildings

- 6.3.53 The Design and Access Statement explains how the design of the proposed cycle parking pavilion building takes account of the existing and emerging context and comprises high quality architecture. This modest building would be a welcome addition to the street scene that would safeguard the character and appearance of No. 36 High Street (a locally listed building), provide enclosure for the rear of No. 34 High Street (whilst maintaining pedestrian access), safeguard the amenities of local residents and make a positive contribution to the character, appearance and safety of a strengthened Peel Road pedestrian route.
- 6.3.54 The application proposes maximum parameters for the layout, scale and massing of a replacement ashram temple building – where outline permission is sought (with all matters reserved). These allow for building footprint up to the limits of the ashram site; a possible single level basement, and; between one and three-storeys above ground level, with a maximum height of between approximately 9.2 and 13.8m (between 62.015 and 67m AOD), stepping back from Palmerston Road. The detailed design of a building will need to be subject to a Reserved Matters application and the layout, scale and massing of a detailed building will need to comply with these parameters.

- 6.3.55 The proposed parameters have been informed by an assessment of existing and emerging context and the results of detailed daylight and sunlight analysis to ensure that a building results in acceptable daylight and sunlight conditions within nearby homes (particularly the existing flats on the south side of Palmerston Road). Given that outline permission is being sought for a single bespoke building, the Applicant is not proposing to augment these parameters by way of a Design Code or Design Guidelines. The LPA will retain control of design through pre-application discussions, the design review process and determining a Reserved Matters application(s) and will be able to use these tools to ensure that a replacement temple is a high-quality building.
- 6.3.56 Given the above, the proposals comply with London Plan Policies 7.4 and 7.6 and Local Plan Policies AAP3, AAP4 and DM1.

Heritage Assets

- 6.3.57 The NPPF (Para.128) states that the LPA should require an applicant to describe the significance of any heritage asset affected, including any contribution made by their setting.
- 6.3.58 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'.
- 6.3.59 Paragraph 132 of the NPPF states:
'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting'.
- 6.3.60 Paragraph 134 of the NPPF states:
'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use'.
- 6.3.61 London Plan Policy 7.8 (Heritage Assets and Archaeology) states that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate, and that development affecting heritage assets and their settings should conserve their significance by being sympathetic to their form, scale, materials and architectural detail.
- 6.3.62 Local Plan Policy AAP4 (Achieving a High Standard of Design throughout the Heart of Harrow) calls for new development to conserve and enhance the significance of heritage assets, including their settings. Policy AAP6 (Development Height) also calls for new development to conserve and enhance the significance of heritage assets and the wider historic environment that would be sensitive to taller buildings. Local Plan Policy DM7 (Heritage Assets) states that the conservation of heritage assets will

be afforded priority over other policies when assessing proposals affecting heritage assets, and sets out detailed criteria for the consideration such proposals.

- 6.3.63 The application site is not within a conservation area but does lie within the setting of various Grade II listed and locally listed buildings. The accompanying Heritage Impact Assessment identifies 5 heritage assets including Harrow and Wealdstone Station and Platform buildings (Grade II), Wealdstone Police Station Grade II), Locally listed Holy Trinity Church, locally listed No. 36 (Lloyds bank) High Street and non-designated heritage asset No. 22 Palmerston Road (existing ISSC building).
- 6.3.64 In respect of Harrow and Wealdstone Station and Station Platform buildings, the assessment finds the proposed development would be seen amongst town centre development which already features in views from these locations and the colour of the new civic centre would be accommodated within the setting which also features modern elements. It is concluded that overall there would be a minor but not adverse effect on the setting.
- 6.3.65 In respect of Wealdstone Police station the assessment finds that there would be no direct visibility of the proposed development from this building. However, there would be visibility of the upper part of the new civic centre in the setting of this building. In some view the top of the new civic centre would appear above the police station but would be of a comparable scale and massing to other modern town centre development, particularly Premier House and would site amongst this development in views. The colour of the building would be noticeable within the context and would introduce architectural variety and distinctiveness and as outlined previously is considered to be acceptable by officers given the civic function. Overall the assessment finds that the setting and significance would be preserved.
- 6.3.66 The HTVA outlines that the greatest effect would be on the locally listed Trinity Church in views along Canning Road. The new building would be seen amongst other modern development in the setting and the scale and massing would be acceptable in the context and comparable to in scale of Premier House, although largely screened by it. The report considers that that the 'entry tower' and entrance would introduce further activity into views and create a feature and focal point and furthermore the community/civic role of the building would be complementary to the community role of the church and a traditional town centre use. The improved public realm would introduce activity into the setting. For these reasons, it is concluded that the setting would be enhanced and the significance preserved.
- 6.3.67 There would also be large change to the setting of the locally listed No. 36. In respect of this building, the assessment considers that the proposed new civic centre would introduce a high quality modern architecture into the setting and increase active frontage and activity as well as architectural interest and variety. The replacement of the surface level car park with a new ISSC building would be in keeping with the scale of the surrounding buildings, would in principle be an enhancement. Nevertheless, as noted in the HTVA, the quality of the design, its orientation, articulation and materials will be an important consideration at the detailed design stage. The single storey cycle store and sub station would be situated directly adjacent to the wall on the rear boundary of the property and would screen the lower rear part of the bank in views from Peel Road. However, the additional screening

would be minimal and at the rear of the building. The HTVA considers that the termination of the string course on the rear elevation suggests it was not of importance when compared to the side elevation and decorative front elevation and this limited loss of visibility would not affect its significance. Officers consider that the scale of the cycle store and sub station would be sympathetic to the bank and subservient to it. Furthermore, it would also be set back from the building line of the bank so would not dominate in views along the side elevation from the High Street. The timber enclosure would be a simple modern structure which would be lit at night and would improve the appearance and activity levels along Peel Road and is considered to be an acceptable addition. Overall, the assessment finds that the setting of this building would be enhanced and the significance preserved and officers agree with this conclusion.

6.3.68 The final building considered in the HTVA is No. 22 Palmerston Road. However, this building has not been locally listed by the Council. Nevertheless the HTVA considers the building to have some limited architectural interest as a remnant of the initial phase of development in the area and as such there would be some harm arising from its loss as a consequence of the proposals. Officers consider the proposed building to be of low significance as a heritage asset, which is reinforced by its non-designated status. Overall, in officers' view, the wider public benefits of the proposed development in terms of significant regenerative benefits to Wealdstone Town Centre would outweigh the loss of the building. Moreover, the loss of its communal value would be accommodated by the replacement ISSC.

6.3.69 In summary, the heritage impact assessment considers that the significance of the heritage assets would be preserved. The report concludes that where the development would be visible in the setting of heritage assets, its impact would be mitigated through the use of high quality architecture, distinctive materials and appropriate scale within the surrounding context. The application has been referred to the Council's Conservation officer who is satisfied with the conclusions and findings of the heritage impact statement. As such, it is considered that the assessment demonstrates that the significance of the identified heritage assets would be sustained and the proposed development would not conflict with any of the above stated requirements of the Harrow development plan.

6.4. **Landscape and Public Realm**

6.4.1 Paragraph 58 of the NPPF states that planning decisions should aim ensure that developments are visually attractive as a result of, inter alia, appropriate landscaping.

6.4.2 London Plan Policy 7.5 Public Realm seeks landscape treatment, street furniture and infrastructure of the highest quality and calls for opportunities for greening to be maximised.

6.4.3 Draft London Plan Policy D7 outlines that development proposals should ensure the public realms is safe, accessible, inclusive, attractive, well connected easy to understand and maintain and that it relates to the local and historic context and

incorporates the highest quality design, landscaping, planting, street furniture and surfaces.

- 6.4.4 Local Plan Policy AAP 7 Creating a New Public Realm requires all development within the Heart of Harrow to contribute to the creation of a high quality, accessible, safe and attractive public realm; further biodiversity enhancement measures, are set out in Policy DM 21.
- 6.4.5 Local Plan Policy AAP3 (Wealdstone) states that proposals in the sub-area should (amongst other things) (b) contribute to the enhancement of the urban realm and visual amenity of the district centre as a key transport gateway into the Heart of Harrow; (c) contribute to the broader east-west connectivity set out in the Vision; (d) provide a design which respects, and relates positively to, the centre's heritage and character in terms of architecture, streetscape and road layout (e) make a positive contribution to the perception of safety and security within the centre; and (f) create an accessible, family friendly environment.
- 6.4.6 Policy DM22 Trees and Landscaping requires landscaping that: is appropriate to the character of the area; is well laid out; achieves a visual setting for buildings; provides sufficient space for planting to grow; and supports biodiversity.
- 6.4.7 The proposed development will deliver a substantial uplift in the quality of the public realm on site, whilst addressing existing anti-social behaviour. It has also been developed carefully to integrate with forthcoming improvements in the town centre which are being brought forward by the Council (including the Wealdstone Improvement Scheme and Wealdstone Square Scheme discussed in the Design and Access Statement). The proposed landscaping and public realm works are outlined in full in the Design and Access Statement. In summary, the key elements are:
- A pedestrian/cycle route from the High Street to George Gange Way (and via the crossing) along the former Peel Road alignment – including careful mediation of change of levels, improved visibility and incorporation of a swale;
 - Comprehensive improvement of existing footways, Gladstone Way carriageway and cycle path, incorporating short-stay cycle parking, trees, other planting and bird nesting boxes that enhances biodiversity and lighting and creates a safe and accessible environment;
 - Attractive and accessible entrances to the proposed New Civic building;
 - Vehicular servicing along Gladstone Way;
 - A pavilion building for long-term cycle parking and electricity sub-stations and maintaining pedestrian access to the rear of No. 34 High Street;
 - A surface car park for visitors to the town centre, incorporating a vibrant graphic surface treatment and allowing for occasional use by town centre uses, such as market stalls; and
 - A rooftop terrace on part of the fourth floor of the New Civic building, providing a social outdoor space for council staff and event space related to the Marriage Multi-Functional Space and less formal events.

- 6.4.8 Some features, including low level timber fencing around the proposed surface level car park and a height restriction barrier for the car park have yet to be designed in detail. However, a planning condition can be secured reserving details of these features for subsequent approval by officers.
- 6.4.9 The proposed high-quality landscaping and public realm works will help transform this part of Wealdstone Town Centre in to a more attractive, safer and inclusive place. It will significantly improve east-west permeability and connectivity for pedestrians and cyclists, improve the setting the locally listed building at No.36 High Street and also include a swale to help improve drainage and bird nesting opportunities to enhance biodiversity. The proposed works have been designed to facilitate further improvements to the surrounding streets and allow for the incorporation of a future District Energy Network.
- 6.4.10 The application has been referred to the Councils Landscape Architect who has raised some concerns with the southern entrance, plant selection and the number of trees in the surface car park. The applicants have sought to address the comments and have provided additional trees and a revised planting strategy. The applicants have sought to explore alternative options for the southern entrance including the provision of a wider ramp. However, it is outlined were the ramp were to be wider it would require a handrail along its centre, as well as reducing the width of Peel Road. This is not considered by officers to be desirable. Nevertheless, the applicant has amended the steps to the southern entrance so that a deeper tread is provided to provide improved access in this location. Any additional comments on the landscape and public realm strategy will be reported via the committee addendum.
- 6.4.11 Given management and maintenance are important aspects of ensuring high quality places, a planning condition is recommended requiring a landscape management and maintenance plan together with a detailed landscaping and planting strategy to be submitted for approval prior to the commencement of development.
- 6.4.12 Officers consider that the new landscape strategy will create a coherent, biodiverse and attractive landscape setting for the development. The proposals will enhance the clear architectural design approach of the proposal, encourage active travel including movement for pedestrians and cyclists, will activate and significantly improve natural surveillance of the surrounding streets. Overall the proposals will help the buildings integrate successfully with their surroundings and enhance the regeneration of Wealdstone Town Centre whilst also enhancing biodiversity.
- 6.4.13 Given the above, the landscape and public realm proposals accord with London Plan Policy 7.5, Draft London plan Policy D7 and the Mayor's All London Green Grid SPD and Local Plan Policies AAP3, AAP7, AAP11, DM1 and DM2.

6.5. Residential Amenity

6.5.1 The National Planning Policy Framework emphasises that:

- The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.” (Paragraph 56).
- It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes” (Paragraph 57).
- Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations.” Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.” (Paragraph 61).

6.5.2 Policy 7.6B, subsection D, of The London Plan (2016) states that new buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.

6.5.3 Draft Policy D1 A of the London Plan 2017 requires development proposals to deliver an appropriate outlook, privacy and amenity and help or mitigate the impacts of noise and poor air quality.

6.5.4 Draft Policy D4 F of the Draft London Plan makes clear that the design of development should provide sufficient daylight and sunlight to new housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside space.

6.5.5 Core Strategy Policy CS1 B requires development to respond positively to the local context in terms of design, siting, density and spacing.

6.5.6 Policy DM1 of the Local Plan undertakes to assess privacy and amenity having regard to, *inter alia*: the prevailing character of privacy and amenity and the need to make effective use of land; the overlooking relationships between windows and outdoor spaces; the distances between facing windows to habitable rooms and kitchens; the relationship between buildings and site boundaries; and the visual impact when viewed from within buildings and outdoor spaces. Supporting text to Policy DM1 (2.12) states that “Sunlight, daylight and outlook are highly valued components of residential quality that need to be considered early within the scheme design, especially where they add to the sustainability and attractiveness of the development. In addition to impacts on neighbouring development, the consideration of satisfactory sunlight, daylight and outlook applies equally to the proposed building(s) on site.

- 6.5.7 The Council's Residential Design Guide SPD sets out the Council's 45-degree code, which is a tool used to manage the relationship between buildings and spaces. It helps to ensure that visual impacts are appropriately contained and that reasonable levels of light and outlook are maintained.
- 6.5.8 There is no planning standard for the separation distance between non-residential buildings and homes. The Mayor's Housing SPG notes that, in the past, planning guidance for the relationship between homes has set a minimum distance of 18 – 21m between habitable rooms. It goes on to acknowledge that these can still be useful yardsticks for visual privacy, but adhering rigidly to these measures can, amongst other things, limit the variety of urban spaces and can sometimes unnecessarily restrict density.

Visual Impact, Outlook and Privacy

- 6.5.9 The applicants supporting documentation outlines that the proposed new buildings have been carefully design to safeguard the amenity of the existing and future residents. The proposals would have a dramatic visual impact for some of the surrounding neighbouring buildings, in particular Canning Point to the north and Premier House and No's 26 to 36 High Street to the west of the site.
- 6.5.10 The northern side of the new civic building would stepped down towards Canning Road with the exception of the proposed belvedere structure. The northern elevation of the building would be sited between approximately 17.4 and 25 metres away from the Canning Point development immediately to the north. At its closest point where the northern elevation is stepped out it would be approximately 15 metres away. The proposed higher 5th and 6th storey and perimeter plant screen would be sited between approximately 30 to 37 metres away. Although the northern elevation would contain a large amount of glazing, this elevation would have a partly angled orientation towards Canning Point which would help mitigate any perception of overlooking. In officers opinion the distances between the proposed civic building and neighbouring building are reasonable, particularly having regard to the urban town centre location and would ensure that no unreasonable harm would occur with regard to visual and privacy impacts. The proposed fourth floor roof terrace will sit above the highest flat in Canning Point and at about the same height as the proposed fifth floor residential extension to Premier House. Subject to an appropriately worded condition to manage the use of this terrace, it is not expected that its use would impact negatively on privacy or outlook.
- 6.5.11 The western elevation of the proposed civic building would be approximately 20 metres away from the nearest of the approved homes on the upper floor of premier house (refer to planning history). This is also considered to be acceptable and would be commensurate with the urban character of the proposed development and the location.
- 6.5.12 The proposed single-storey cycle parking pavilion would not have a negative impact on the privacy of first-floor non-residential window of No. 36 High Street and would enable satisfactory outlook from this room.

- 6.5.13 The proposed parameters plan for a replacement ashram temple allows for a 9.2m high building up to the back edge of the northern pavement on Palmerston Road (around the same height as the mixed commercial/residential buildings fronting Palmerston Road further to the west) and approximately 13m to the north of the existing Birchfield block of residential flats, located on the southern side of Palmerston Road. They also allow for an ashram temple to step up in height to around 13.8m above ground from a point 8m back from the back edge of pavement. There are many streets in London where non-residential and residential buildings face each other over these sorts of distances and the proposed relationship should safeguard the privacy and outlook of people living in Birchfield. The proposed parameters also allow for a building on the western edge of the site, approximately 18m from windows of residential flats on the upper floors of Nos. 32 and 34 High Street. Officers also considered that, this proposed relationship to be sufficient to safeguard privacy and outlook for people living in these flats. Further consideration would be given to impacts on privacy and outlook at the detailed design stage following the submission of reserved matters applications.
- 6.5.14 Undoubtedly, the proposed buildings would have a dramatic visual impact visual for the closest neighbouring developments outlined above. However, noting that the application site actually falls in the town centre boundary, relative to other parts of the Borough, the surrounding area is a more urban environment and it is envisaged that those choosing to live so centrally would expect a visual environment that includes some large buildings. Moreover, the development is considered by officers to be of high quality appearance and will be offer a significant visual improvement compared to the existing Peel House car park. The other flats on the eastern side of the civic building on the opposite side of George Gange Way which have a north south orientation, not direct towards the site, will not be adversely affected in terms of their outlook or privacy in officers' view.
- 6.5.15 The overall separation between the proposed building and existing surrounding development are considered to be consistent with spacing and separation that is typical of many urban areas across Harrow. The size and siting of the proposed buildings are not considered to be overly dominant or at odds with the wider character and relationships between buildings that are found elsewhere within this urban location. Furthermore, the impact must be judged against the desirability of securing new civic and community buildings with the potential to generate significant regenerative benefits to an economically and socially deprived part of the borough on this previously developed and highly accessible site within the Harrow and Wealdstone Opportunity Area. On balance, officers opinion, any perceived harm that would be caused, is not outweighed by the other planning benefits of the proposals.
- 6.5.16 The proposed development would, of course, be visible to residential occupiers and from commercial premises over a much wider area, not least within other parts of Wealdstone town centre and further east along Canning Road and Peel Road. Nevertheless, given the conclusions about visual and privacy impact in relation to properties much closer to the application site than those within the

wider area, it follows that the visual and privacy impact upon occupiers of all other affected properties would be acceptable.

Daylight and Sunlight

- 6.5.17 The Mayor's Housing SPG includes the following guidance with respect to daylight and sunlight:
- 6.5.18 "1.3.45 ... An appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.
- 6.5.19 13.46 The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm."
- 6.5.20 The scale and massing of the proposed scheme has been informed by advice from daylight and sunlight consultants and the application is supported by a Daylight and Sunlight Report. The daylight and sunlight report is based on the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight: A Good Practice Guide'. The assessment considers the impact on the site's residential neighbours, and on the quality of sunlight and daylight to the new residential dwellings and open space. The methodology adopted is considered to be appropriate.
- 6.5.21 The impact of the proposed development largely complies with the default BRE criteria. Whilst there are localised impacts, in each case these are reasonable and compare favourably with appropriate urban daylight levels. In this location, the Applicant considers that VSC values of 20% or more represent a good level of daylight that is commensurate with or better than those found in other desirable regions of London. There are isolated exceptions to this in constrained locations but this is a normal pattern of daylight distribution in an urban location. The proposed roof terrace on the fourth floor of the proposed New Civic building and nearby residential gardens to the south of the site will all significantly exceed the BRE guidance on sunlight within garden/amenity spaces (at least half of the space receiving at least two hours of sunlight on 21 March).
- 6.5.22 The Council commissioned an independent assessment of the applicants' daylight and sunlight analysis undertaken by Delva Patman Redler Chartered Surveyors. In respect of daylight, the independent assessment agrees with the applicants assessment in that the results for the majority of residential properties

surrounding the development would be negligible but that there are some properties which will experience an impact greater than negligible including Canning Point, 1A, Peel Road, 38 Peel Road and Premier House.

- 6.5.23 With regard to 1A and 38 Peel Road and Premier Road, the independent assessment still generally finds the impacts to these properties to be insignificant as they will all still retain good levels of light. The independent review notes that the most notable impacts in terms of daylight would be to Canning Point to the north of the site. The results of this property are affected by the fact that the building has deep balconies and the windows are set back behind those balconies and have a limited range of sky light visibility. The report outlines that the set back windows in the centre of the facing elevation serve bedrooms which will experience significant reductions in sky visibility and some of the bedrooms will be left with poor levels of daylight.
- 6.5.24 Notwithstanding the impacts outlined above, the independent review outlines it could be considered appropriate to assess the building as if it were part of the overall development of the area, given the building is relatively newly constructed and the occupiers have not enjoyed the existing daylight levels for any significant material period of time. Moreover In this case, it is stated it is also worth considering whether Canning Point is effectively a “bad neighbour” development in relation to the bedroom windows as their daylight is already so constrained. On this basis, and with the retained levels of daylight that will be left to the rooms that are not set back as well as the sites urban town centre location, the impacts on the building are concluded to be capable of being acceptable.
- 6.5.25 In respect of impact on sunlight the independent assessment concludes that all properties, except one, a sunlight analysis is either not required or the results meet the BRE standards. The exception is Canning Point where some of the windows will have annual or winter sunlight below the recommended minimum level and with more than a 20% reduction. However, as discussed above, the independent assessment considers that it is appropriate to treat this as a new construction where residents will not have enjoyed existing levels of sunlight for any material length of time. On this basis and having regard to the sites urban location as well as the buildings own in built constraints to sunlight as a result of overhanging balconies, the impacts on Sunlight to this building are concluded to be acceptable.
- 6.5.26 Overall, having regard to the applicant report and the expert independent assessment undertaken on behalf of the Council, it can therefore be concluded that the proposal achieves BRE guideline levels of daylight to the majority of the windows of the nearest neighbouring residential properties surrounding the site. For those properties identified as having shortfalls these are generally considered to be marginal with the exception of the southern windows on the Canning Point development to the north of the application site. Nevertheless, as discussed above, this building is already heavily constrained by its own design and is a relatively new building which sites within the Harrow and Wealdstone Opportunity Area. As such, further developments in line with the aspirations of the local plan are to be expected in this location. Although a number of windows would experience notable reductions in daylight, a number of these flats would still

receive good levels of daylight from their living spaces which have windows facing north at the rear of the building. In officers opinion, on balance, the fact that the worst affected windows are bedrooms set back behind deep balconies as well as having regard to the sites urban location within the Opportunity Area, it is considered that the proposal's impact upon daylight to this neighbouring property is acceptable and would not reasonably justify withholding planning permission when balanced against the other planning benefits of the scheme.

- 6.5.27 As the majority of the nearest neighbouring windows affected by the development are assessed as achieving guideline levels of daylight, it is reasonable to extrapolate that the daylight impact of the development on daylight to property over a wider area (i.e. not the subject of the Assessment) would not be significant. In this and all of the above circumstances, therefore, it is considered that the proposal's impact upon daylight to neighbouring property is acceptable.
- 6.5.28 Given the above, the proposals comply with the above stated policies including Local Plan Policies CS1 and DM1 and guidance in the Residential Design Guide SPD.

Impacts of Proposed Uses

- 6.5.29 Local Plan Policy DM 41(Evening Economy) includes criteria requiring the consideration of impacts of uses proposed upon neighbouring residential occupiers. Policy DM 1 (Achieving a High Standard of Development) requires consideration of the amenity impact of a proposed use/activity in terms noise (including hours of operation), vibration, dust, air quality and light pollution.
- 6.5.30 The proposed New Civic building would be in use during similar times to the existing Civic Centre. This is primarily during the working week (Monday to Friday), including evening public meetings that can go on to around 11.00pm, and also during the weekend for special events, including weddings on Saturdays. The proposed building will be air conditioned with fixed glazing and the submitted Noise Impact Assessment does not anticipate any significant noise breakout from the building. The proposed fourth floor roof terrace will sit above the highest flat in Canning Point and at about the same height as the proposed fifth floor residential extension to Premier House. The proposed kitchen on the fourth floor of the building will be ventilated at roof level, again above the height of existing and proposed residential flats and, subject to satisfactory detailed ventilation arrangements, the submitted Air Quality Assessment does not identify any significant effects. There will be some light spillage from the building, but the submitted Lighting Statement does not identify any adverse effects on residential amenity.
- 6.5.31 The application has been referred to the Councils Environmental Health Department who have raised no objections subject to securing planning conditions in relation to odour from any kitchens installed, air quality and dust management, banning of any amplified noise or music from the terrace and limiting the hours of use of the terrace.
- 6.5.32 Additionally Environmental Health have confirmed they are satisfied with the recommendations of the lighting report, in terms of avoiding nuisance from glare and

light overspill to surrounding residential properties, and also for use of blinds for late-night council functions.

- 6.5.33 Should approval be granted, planning conditions to manage the hours of use of the proposed terrace, ensure satisfactory ventilation arrangements and ensure that roof-level plant and machinery is designed to meet satisfactory noise emission criteria can be secured. Subject to such conditions, it is not expected that the use of the building and its basement car parking area or associated servicing activity will impact negatively on residential amenity.
- 6.5.34 The proposed surface car park will operate in a similar way to the existing surface level car park; it will remain accessible at all times, subject to a height restriction, and be subject to controls between the hours of 08.00 and 18.30 Mondays to Saturdays. The proposed landscaping works have been carefully designed to make the area safer and to design-out anti-social behaviour as much as possible, whilst ensuring that there is no light pollution to nearby homes. This aspect of the proposal is considered to be acceptable.
- 6.5.35 The proposed replacement ashram is expected to operate during similar hours as the existing place of worship. This is generally between the hours of 06.30 to 21.00 Mondays to Sundays (including public holidays) and up to 01.00 for special events/festivals. The submitted Noise Impact Assessment reports on the findings of a noise break-out assessment and concludes that, based on assumptions about the fabric of the building/glazing specification, the proposed use should have a negligible impact on the nearest noise sensitive receptor and that noise associated with events held in the building should be acceptable. The LPA will have the opportunity at Reserved Matters stage to ensure that the detailed building fabric/glazing specification is sufficient to ensure no unacceptable noise breakout.
- 6.5.36 The submitted Transport Assessment includes an Outline Construction Logistics Plan in order to, amongst other things, to ensure deliveries are planned and managed, promote the use of low emission vehicles and encourage construction workers to travel by non-car modes. It is inevitable that there will be an increase in noise and disturbance and levels of traffic during the construction process; however the impacts would be temporary and can be mitigated to some extent. A detailed construction management/logistics strategy can be secured by a planning condition to ensure that working practices including managing and maintaining site access routes, delivery times and security procedures would not unduly impacts on the residential amenities of existing and surrounding neighbouring occupiers.

6.6. **Transport and Parking**

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

- 6.6.2 The London Plan Policies 6.3, 6.9 and 6.13 seek to regulate parking in order to minimise additional car travel, reduce trip lengths and encourage use of other, more sustainable means of travel. The Parking Addendum to Chapter 6 of The London Plan sets out maximum parking standards for new development dependent upon their use and level of public transport accessibility. It is noted that at supporting paragraph 6A.3A to the Parking Addendum sets out that there is scope for greater flexibility to the parking standards in different parts of London having regard to patterns of car ownership and use, levels of public transport accessibility, the need for integrated approaches to on-site and off-street parking, efficiency in land use and overall impact upon environment and the transport network.
- 6.6.3 Relevant policies in the Draft London Plan (2017) are considered under policies T1, T3, T4, T5, T6.
- 6.6.4 Policy AAP 19 of the AAP seeks to limit on site car parking and development proposals to support the use of sustainable modes of transport, in particular in areas that have a high level of public transport accessibility. Policy AAP 20 (Harrow and Wealdstone Green Travel Plan) seeks to ensure that all major developments produce a site specific travel plan to demonstrate how the development would meet the wide Green Travel Plan provisions.
- 6.6.5 Local Plan Policy DM 42 (Parking Standards) (Part A) makes clear that proposals that make on-site provision for parking will be supported where:
- a. the number of vehicle parking spaces (including those with electric vehicle charging points) would have regard to the maximum London Plan standards; and
 - b. there would be 1 motorcycle/ scooter parking space (of dimensions 2.0m x 0.8m) per 20 car parking spaces subject to all developments with more than 10 car parking spaces having a minimum of 1 space.
- 6.6.6 Part B of the Policy DM42 states that proposals involving parking provision that would not be consistent with the London Plan will be assessed having regard to any exceptional operational requirements, any special safety considerations and the desirability of achieving modal shift away from private car use.
- 6.6.7 Part E of Policy DM42 states that the design and layout of parking areas (including those for scooters, motorcycles and bicycles) should be safe, secure and fit for purpose. Access to and from the public highway should maintain and, where necessary, improve safety and give priority to the convenience of pedestrians and cyclists.
- 6.6.8 Part F of Policy DM42 states that proposals that would result in inappropriate on-site parking provision, having regard to the criteria in this policy, and those which would create significant on-street parking problems, prejudice highway safety or diminish the convenience of pedestrians and cyclists, will be resisted.
- 6.6.9 The application is supported by a Transport Assessment (incorporating an Outline Car Parking Management Plan, Outline Delivery and Servicing Plan and

Outline Construction Logistic Plan). It is also supported by a Travel Plan for the proposed New Civic building.

Access and Highways

- 6.6.10 The development site is located in the centre of Wealdstone. Roads around the site include A409 George Gange Way to the east, Canning Road to the north, Gladstone Way through the centre, High Street to the west and Palmerston Road to the south.
- 6.6.11 Gladstone Way is proposed to be a one way southbound street with pedestrian and cycle priority. This will also provide access to the proposed staff car parking in the basement of the proposed civic offices and servicing and deliveries for the proposed offices. Therefore, Gladstone Way is proposed to be for access only. This arrangement is considered acceptable by officers.
- 6.6.12 A new pedestrian/cycle route through the site is proposed as a continuation of Peel Road running east/west.
- 6.6.13 In regards to access to the surface car park, concerns were raised by LBH Highways regarding potential traffic queues building up at the roundabout at A409/Palmerston Road and that it may result in conflict with consented Palmerton Road scheme on the opposite side of the site. However the applicant has provided additional information demonstrating that an all movement junction access for the proposed surface car park (allowing right in and right out from Palmerston Road would be achievable. As such, subject to securing a condition to make clear that notwithstanding what is shown on the drawings, details of the vehicular access (including signage and line markings) that facilitate an all movement junction shall be submitted to an approved by the LPA prior to the commencement of development. LBH Highways have confirmed that subject to this they would be satisfied with the proposals in this regard.

Trip generation

- 6.6.14 The submitted TA has considered the existing conditions for all modes of transport including walking, cycling and public transport and car have been considered along with a trip generation exercise to ascertain the likely impact of the development. An assessment of the impact of additional road traffic has been undertaken to determine whether the existing provision is sufficient is of sufficient quantity and quality to accommodate the expected number of trips generated by the proposed development. The findings of the TA show that the impact on any of the surrounding junctions of the site would be nominal.
- 6.6.15 The transport assessment identifies that that there would be an overall increase in trips generated by this redevelopment. This is expected as the site is mainly used for car parking at present. As noted in the consultation response from LBH Highways, additional information was requested in relation to an analysis of the Council's 2017 staff travel.

- 6.6.16 The applicants have outlined that the new facility is not intended to be a replication of the current travel patterns and is aimed at promoting sustainable travel measures at the outset. Its operation would be fundamentally different to the existing civic office, with the number of staff expected in the building at one time reducing from circa 1,200 to 735. As such, in the applicants view the staff travel survey is relevant to develop the applicant's approach for transformation of travel requirements and the Council staff survey should therefore not be used as the only means to accurately estimate the method of travel proposed for the new offices.
- 6.6.17 Moreover, the relocation of the existing Civic offices to the proposed site will progress in phases such that the reduction in car parking spaces would be over a length of time until 2020 when the new civic building is proposed to be completed.
- 6.6.18 Officers acknowledge the above and also recognise that the existing staff together with their home location and travel behaviour will change over time. However, it is also considered a transitional strategy is crucial in managing the transition to a lower level of car access.
- 6.6.19 As such, although the trip generation data indicates there will still be demand for parking that exceeds the number of parking spaces proposed for staff use and this will most certainly result in some on-street parking, should the predicted modal shift be realised, this would result in a significant reduction of car trips on the surrounding highway network which is considered a valuable benefit.
- 6.6.20 The applicants have outlined they are developing a transitional Travel Plan strategy to assist with the change to introduce a package of smarter choice measures to influence staff and visitor travel choices and will include short, medium and long term measures for transition and make recommendations for measures to be included in the framework travel plan documents which will be considered further through the planning process. Such measures will include personalised travel planning and potentially improved software to enable more efficient remote working.
- 6.6.21 In light of the above, officers recommend a Detailed Transitional Travel Plan is secured by planning condition, to be submitted to the LPA by July 2018 to ensure a successful transition can be implemented over a two year period prior to the occupation of the new building. Officers consider that subject to securing this will assist with the ambitious level of car trip reduction proposed.
- 6.6.22 The Transport Assessment submitted in support of the application includes an assessment of the likely impacts on the public transport network, cycle and pedestrian network and road traffic. Overall it shows that it is anticipated the level of trips generated by the development can be accommodated on existing services and in the areas surrounding cycle paths and footpaths.

Parking

- 6.6.23 The loss of parking has been previously discussed in the Principle of the Development and is considered to be acceptable.
- 6.6.24 The proposed staff parking is to be provided in a semi-basement offering 34 spaces, inclusive of nine blue badge spaces. The proposed level of parking represents 5% of the existing amount available at the current site. This is a major reduction in space and it is recognised that this would require a lot of work to achieve the required change in travel habits.
- 6.6.25 Of the 550 staff parking spaces at the current civic centre site, it is anticipated that by September 2018, around 40% will be lost and the remaining spaces as a result of the development of the existing site will be phased out by 2020 when the new civic building is anticipated to be completed.
- 6.6.26 The level of car parking proposed for the new civic building would be within the relevant London Plan Parking Standards which allow for between 15 and 90 spaces. Nevertheless, it is acknowledged that the proposed car parking provision only represents about 5% of the staff car parking that is available at the existing Civic Centre. However, as discussed above, subject to securing a Transitional Travel Plan by July 2018, it is considered that this will make a significant contribution to modal shift before staff move to the new building.
- 6.6.27 The submitted TA includes details of a car park management plan but a further detailed version can be secured for both staff car parking and the surface level car park. The proposed pool cars would be double banked but it is intended that they will be managed through a central booking system and the details of this could be secured through the provision of a car park management plan.
- 6.6.28 The GLA response also notes that any car park management plan must prevent long stay use of the town centre spaces, including persons working at the Council offices and to consider dual use of office provision to reduce separate provision for the town centre at peak times when the Council offices are closed.
- 6.6.29 As noted in the Planning Statement, the application before the LPA is for a new civic building, surface level car park and replacement temple and that 'subject to identifying satisfactory alternative town centre car parking facilities, the land (to the east of Gladstone Way) could accommodate a mixed-use/residential building providing between 80-100 homes in the future. However this is an aspiration and is not being considered under the current proposals.
- 6.6.30 Officers note that the landscape plans show that there is an area to the north of the car park indicated as 'flexible use space for parking and events facing Peel Road.' However, the applicant has outlined that possible use of part of car park for other use is subject to parking demand which could also be addressed through provision of a car park management plan discussed above.

- 6.6.31 As outlined in the consultation response from LBH Highways, the reduction in staff and public parking is likely to give rise to some increased parking stress on surrounding streets. At present the streets to the east and west of the proposed civic offices site are subject to controlled parking restrictions from 10am to 11am and 2pm to 3pm Monday to Friday (CPZ Zone CA). This type of restriction is primarily to restrict people from parking for prolonged periods of time, particularly parking and commuting using public transport. However, it is possible that the street could be used by visitors and staff to the civic offices as well as the town centre. Notably LBH Highways is currently consulting on extending the CPZs CA into Zone CPZ J and extending zone CA to include Byron Road, Wealdstone and streets to the east.
- 6.6.32 In order to mitigate this issue further possible extensions to the CPZ can be investigated to include an extension to the existing hours, including for the streets to the west subject to due consultation with the relevant authorities and the public. A financial contribution of £10,000 for CPZ investigation and £50,000 for possible implementation is recommended to be secured as part of the committee decision, should approval be granted.
- 6.6.33 LBH Highways have considered the additional analysis and the Council's Staff Travel Survey Questionnaire (2017) submitted by the applicant and consider that the level of parking proposed can be supported subject to careful management and mitigation through the Transitional Travel Plan, a detailed Full Travel Plan for the office an effective car park management plan as well as an investigation into an extension or extended controls of the surrounding CPZs.
- 6.6.34 The two accessible car parking spaces that are expected to be provided as part of the proposed replacement ashram temple is in accordance with the relevant minimum accessible spaces for the proposed maximum floorspace (1,672sqm) and this aspect of the proposal is considered to be acceptable.
- 6.6.35 A further condition is recommended to secure Electric Vehicle charging points within the surface level car park and civic centre car park in line with London Plan (216) Standards.

Cycle parking

- 6.6.36 The proposals include 100 long-stay cycle parking spaces for staff working in the New Civic building in a safe and secure pavilion building (with a mixture of Sheffield Stands and stacking, including provision for 5% of spaces for larger cycles such as trikes). This is based on the London Plan's more stringent minimum standards for Inner London. Locker space and showers will be provided on the mezzanine level of the proposed New Civic building to encourage staff to cycle.
- 6.6.37 The proposals also include 11 stands (22 parking spaces) in the public realm areas (close to both entrances of the proposed New Civic building) for visitors to park their bikes. Again, this level of provision is based on the London Plan's Inner London standards. The proposed public realm works also accommodates the existing cycle lane that runs along the side of George Gange Way.

- 6.6.38 Detailed designs for the proposed replacement ashram temple is expected to include provision of long and short-term cycle parking in accordance with London Plan standards (1 space per 8 staff and 1 space per 100sqm respectively).
- 6.6.39 It is noted that that the GLA response outlines that cycle parking spaces be EVCP should be provided in line with the new Draft London Plan (2017) Standards. However, officers consider this request to be unreasonable given the limited weight that can be afforded to the plan at this stage in the process and this would therefore conflict with paragraph 216 of the NPPF (2012). Nevertheless, it is possible that further spaces could be considered through the Travel Plan should demand dictate.
- 6.6.40 Furthermore the GLA response outlines a need to secure improvements in relation to cycling identified within the The Cycling Level of Service (CLoS) in the submitted TA. However, the issues relating to cycling are to be addressed as part of other schemes already agreed. This will include changes to George Gange Way, Canning Road and Palmerston Road.
- 6.6.41 Given the above, the proposals accord with London Plan Policies 6.9 and 6.13 and Local Plan Policies AAP19 and DM42

Office and ISSC Travel Plan

- 6.6.42 The submitted office travel plan provides a rigorous framework to reduce user reliance on private car and instead encourage sustainable modes of transport and also helps promote the health benefits of cycling and walking. The submitted Travel Plan proposes conducting surveys of the mode of travel of the site's users three months into the building's occupation, after 3 years and after 5 years. It goes on to identify appropriate mode share targets (for walking, cycling, use of different forms of public transport, driving, car passenger etc.) for three and five years after the New Civic building opens, identifies a range of measures for achieving these targets and proposes the appointment of a Travel Plan Co-Ordinator to oversee the implementation of the Plan.
- 6.6.43 It is recommended that a detailed Full Travel Plan be secured by condition prior to occupation of the building as well as a financial contribution of £5000 is secured to monitor the Travel Plan.
- 6.6.44 The GLA response notes that in order to minimise parking impacts for the proposed place of worship, upto date travel surveys and a combined framework travel plan and parking managed plan should also be secured. Officers consider this issue can be considered at reserved matters stage by condition and subsequent section 106 agreement if required.

Servicing and Refuse

- 6.6.45 The Transport Assessment submitted in support of this application includes an Outline Delivery and Servicing Plan and vehicle swept path analysis. The above Plan demonstrates that sufficient refuse and recycling storage is provided within the

proposed New Civic building. It also demonstrates that proposed servicing arrangements for both the proposed New Civic and replacement ashram temple buildings in the form of servicing bays on Gladstone Way is generally acceptable. However as noted in comments from TFL improvement could be made in relation to the detailed design of the Gladstone Way route in order to maintain the safe flow of traffic on this and other public highways, provide a high-quality and safe environment for pedestrians and cyclists and safeguard residential amenity. This will be subject to further discussion with TFL under stage 2 of the GLA referral process. A condition is recommended to secure the detail design of Gladstone Way in order to ensure any conflict with pedestrians and service vehicles is designed out. LBH Highways have not objected to the proposals in respect of the servicing strategy proposed. Furthermore, a detailed delivery and service plan can be secured through condition.

Demolition and Construction Logistics

6.6.46 London Plan Policy 6.3 (Assessing effects of development on transport capacity) calls for Construction Logistics Plans to support major applications.

6.6.47 The submitted outline Construction Logistics Plan would ensure that the developments constructions impacts are minimised and managed appropriately. It is recommended that a detailed Construction Logistics Plan be secured by a planning condition.

6.7. Flood Risk and Drainage

6.7.1 Policy 5.12 Flood Risk Management states that development proposals must have regard to measures proposed in Catchment Flood Management Plans. It is noted that the EA's Thames Catchment Flood Management Plan (2009) focuses on the adaptation of the urban environment to increase resistance and resilience to flood water, and that this objective informed the preparation of Harrow's Local Plan policies on flood risk management.

6.7.2 Core Strategy Policy CS1 U undertakes to manage development to achieve an overall reduction in flood risk and increased resilience to flood events.

6.7.3 London Plan Policy 5.13 states that development should utilise sustainable urban drainage systems (SUDS) and should aim to achieve greenfield run-off rates and this objective is reiterated in Policy AAP9. Policy 5.13 of the London Plan sets out a drainage hierarchy to manage surface water run-off as close to its source as possible.

6.7.4 Local Plan Policies DM9 (Sustainable Flood Risk Management) and DM10 (on-site water management and surface water attenuation) reiterates messages in Policy AAP9. Local Plan Policy AAP 9 *Flood Risk and Sustainable Drainage* calls for major development to: reduce surface water run-off; utilise sustainable drainage systems; ensure adequate arrangements for management and maintenance of on-site infrastructure; use appropriate measures to prevent water pollution; and where appropriate, demonstrate that the proposal would be resistant and resilient to flooding from all sources.

- 6.7.5 Policy DM10 B makes clear that 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 and maintenance of the measures used. In September 2016, the Council approved its Local Flood Risk Management Strategy.
- 6.7.6 The whole site is within a Critical Drainage Area and the vast majority of the site is within Flood Zone 1 (Low Probability), although a small area on the western side of the site near the High Street is within Flood Zone 2 (Medium Probability) and Flood Zone 3 (High Probability) – associated with the Wealdstone Brook.
- 6.7.7 The sequential and exceptions test is considered within the principle of development section of the report. Although a small part of the development site would be situated within flood zones 2 and 3, the proposed buildings would be sequentially located within flood zone 1, low risk and is therefore considered to be acceptable in this respect. The Environment Agency has been consulted on the application and they also concur with officers' view on this matter and have raised no objections to the proposals.
- 6.7.8 The application is supported by a Flood Risk Assessment (FRA) and Surface Water Drainage Strategy. Wealdstone Brook is considered to be the primary source of flood in the area and although a fluvial flood source Wealdstone Brook also conveys surface water, acting in part as a surface water sewer. The FRA notes that detailed flood modelling of the Wealdstone Brook Catchment has been undertaken by Thames Water Utilities Limited in partnership with the EA and LB Harrow to determine the impact the watercourse has on Wealdstone Town Centre and the surrounding area.
- 6.7.9 The FRA adequately demonstrates that the flood levels are not considered to be a risk to the development given flood levels for the 1 in 1000 annual probability storm event would remain approximately 2 metres below the proposed new civic centre's finished floor level (FFL) at 56m AOD. Furthermore, the flood model for the 1 in 1000 annual probability storm event demonstrates flooding of less than 0.01m around the south western boundary of the proposed temple building. Officers consider that the flood risk impact is very low and subject to careful design and flood resilience measures, the impacts of flood risk can be effectively mitigated through the detailed drainage design which can be secured by means of an appropriately worded planning condition.
- 6.7.10 Thames Water modelling does not identify the culverted ordinary watercourse in George Gange Way at risk of fluvial flooding for any of the modelled storm events.
- 6.7.11 Sewer capacity is a concern throughout the borough, however Wealdstone Brook Catchment modelling data does not identify any sewers on the site, or in the near vicinity as a major risk. Notably Thames Water has been consulted on the application and have not raised an objection to the proposal with regards to sewer capacity.

- 6.7.12 The site is not located within an area at risk in the event of a reservoir breach, and there are no canals, ponds or other artificial watercourse located nearby.
- 6.7.13 Risk of flooding at the site from groundwater is considered to be low.
- 6.7.14 The surface water drainage strategy (including attenuation storage tanks, soft landscaping and tree pits, permeable paving and swale) will result in run off rates of between 1.00l/s and 2.40l/s to two outfalls and comply with Thames Water's and the Council's drainage policies. The Council has agreed to adopt the proposed SUDS features.
- 6.7.15 The Council's drainage team has expressed satisfaction with the sustainable drainage strategy, as set out in the applicant's FRA, but has advised that it is necessary to secure detailed drainage proposals as a condition of any planning permission. It is considered that such a condition should include details of the proposed SUDS techniques to ensure that opportunities to manage surface water at the upper end of the hierarchy are exploited wherever possible.
- 6.7.16 In summary, the detailed design of the drainage strategy can be secured by means of a planning condition. Subject to this, it is considered that the proposed development would accord with the above policy requirements.

Accessibility, Inclusive Design and Lifetime Neighbourhoods

- 6.7.17 London Plan Policy 7.1 Lifetime Neighbourhoods requires development to: improve people's access to social and community infrastructure, shops, services, employment opportunities and public transport; contribute to healthy, active lives, social inclusion and cohesion, and people's sense of place, safety and security; and reinforce the character, legibility, permeability and accessibility of the neighbourhood. Local Plan Policy DM2
- 6.7.18 *Achieving Lifetime Neighbourhoods* requires the location, design and layout of development, and any associated improvements to the public realm, transport and other infrastructure, to contribute to the creation of lifetime neighbourhoods. In particular it calls for:
- non-residential development to be located to sustain town centres and local employment opportunities, and to be accessible to all;
 - new residential development to ensure good access to services and facilities, and to provide accessible homes;
 - all proposals to be safe and secure in accordance with Secured by Design principles; major proposals to demonstrate how they contribute to lifetime neighbourhoods within and beyond the site boundary;
 - improvements to the public realm must achieve an inclusive, legible pedestrian and cycling environment; and
 - accessible bus stops and provision of car parking for disabled people;
 - major development within town centres to make provision for the comfort and convenience of all users.

- 6.7.19 Draft London Plan (2017) Policy D3 outlines the requirements for Inclusive Design to ensure development proposals deliver an inclusive environment and meet the needs of all Londoners. It outlines that the development proposal should ensure that they:
- Can be entered and used safely, easily and with dignity by all
 - Are convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment
 - Are designed to incorporate safe and dignified emergency evacuation for all building users. In developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a fire evacuation lift suitable to be used to evacuate people who require level access from the building
- 6.7.20 Justifying text paragraph 4.9 to the Core Strategy (in support of the 18 Overarching Policy Objectives) makes clear that all development should help to create accessible environments. It goes on to state that Lifetime Neighbourhoods are those which are accessible to everyone, from transport services and housing, to public services, civic spaces and amenities and make it possible for people of any age or level of mobility to have a full life and take part in the community around them.
- 6.7.21 Local Plan Policy DM1 (Achieving a High Standard of Development) calls for all proposals to achieve a high standard of design and layout and sets out a range of relevant criteria, including (g) arrangements for safe, sustainable and inclusive access and movement to and within the site. Local Plan Policy DM2 (Achieving Lifetime Neighbourhoods) requires the location, design and layout of development, and any associated improvements to the public realm, transport and other infrastructure, to contribute to the creation of lifetime neighbourhoods. This policy is supported by guidance in the Access for All SPD.
- 6.7.22 As discussed elsewhere, the town centre location means the site has excellent links to the public transport system and a range of shops and services. The proposed community and civic uses will therefore be highly accessible to the wider community in Harrow and will help generate linked trips to the town centre, thereby helping to sustain and enhance the vibrancy and vitality of the District Centre within London. The development will also generate employment opportunities within the community/civic space.
- 6.7.23 The accompanying Design and Access Statement sets out the inclusive and accessible design principles in detail. The proposed public realm improvements would help restore the east-west route through the site through Peel Road, linking the High Street to the Byron Park to the east. In addition a north-south route through Gladstone Way would be maintained, thereby creating a public realm crossroad with Peel Road. Furthermore, the existing designated cycle route connecting Peel Road to Headstone Drive would be retained with the majority having segregated provision between pedestrians and cyclists.

- 6.7.24 Both Canning Road and Peel Road would be the primary pedestrian links, with Canning Road offering direct access from the High Street to the main entrance. Gladstone Way will be for service vehicle access only. It is acknowledged that TFL have raised some concerns in relation to how pedestrians would be prioritised along the Gladstone Way route, even allowing for the aim to undertake all servicing outside peak hours. In response the applicant has outlined that the number of daily service and delivery vehicles on this route is anticipated to be low at a maximum of 14 vehicles per day and could be subject to low speeds of 5mph. In addition it has been suggested that a kerb could be considered to mitigate any accidental migration of manoeuvring vehicles into the path of pedestrians. Further comments are currently awaited from TFL and this issue together with the other issues raised by TFL will be considered further prior to the application being referred back to the GLA under stage 2 of the 2008 GLA referral procedures.
- 6.7.25 Officers consider that the proposed public realm has been carefully thought out in relation to the changing levels across the site which vary from + 52.4m to +55.9m and have taken into account easy accesses into the new development as well as the existing Premier House which has a below street level entrance on Peel Road (+52.350) and a service entrance point on Gladstone Way +55.9m requiring street levels to be raised in this location.
- 6.7.26 Generally routes across the site will be no steeper than 1:30. Peel Road (between High Street and Gladstone Way) will be split into two levels as it currently is to provide a level route that is 1:60 or less steep from the High Street and stepped alternative from Gladstone Way to Premier House peel Road entrance. It is noted in the Design and Access Statement that as site levels rise from +52.5 to 54.75 in the centre of the site at the junction of Peel Road and Gladstone Way, suitable level access cannot be provided without this split. The primary circulation routes will have good levels of lighting and will remain free from potential obstacles including street furniture.
- 6.7.27 The proposed town centre surface level car park will include four designated blue badge space for visitors to the town centre. The accessible bays will conform to the requirements of BS 8300 and would be clearly marked out and identifiable. A total of 9 (or 56%) of the proposed 16 staff car parking spaces would be accessible bays and it is also intended that both of the proposed parking bays for the replacement temple would be accessible. A total of 5% of the long term cycle parking provision would be for non-standard bikes such as trikes.
- 6.7.28 As discussed above, the building would have a semi basement which would raise the building about 1.4m above ground level. The two principal entrances would be easily accessible and step free.
- 6.7.29 A publically accessible viewing gallery within the Council chamber is proposed at Mezzanine level and this will be accessible via lift and designed with suitable viewing spaces for wheelchair users, people with assistance dogs and people with limited mobility.

- 6.7.30 In addition New Civic facilities that include a publicly accessible 'Changing Places' toilet, step-free access, careful specification of fixture and fittings including door furniture, a prayer room with associated washing facilities and audio reinforcement systems to assist hearing aid users and hard-of-hearing staff and visitors.
- 6.7.31 The north loading bay to the east of Gladstone Way is next to the new Civic Centre refuse store and will be used by refuse vehicles for collections. The distance and access routes are considered to be acceptable and the Councils Waste Management Department have raised no objection to the application in this regard.
- 6.7.32 With regard to the accessibility of the replacement Ashram building, this will be assessed within a reserved matters application at a later date. However, it is noted that nothing precludes the building and its associated parking from meeting the high standards of inclusive design required by the development plan.
- 6.7.33 It is considered that overall the applicant has demonstrated that the internal layout of the development and its external spaces would be compliant with the adopted policies. The development would be inclusive and accessible to future residents and visitors alike and would create opportunities for employment and community activity that would contribute positively to the vibrancy of Wealdstone Town Centre. Future users would enjoy access to public open space, community facilities, public transport and economic opportunities within Wealdstone Town Centre. A condition is recommended to ensure that the inclusive access strategy outlined within the applicant supporting documentation is implemented. Subject to this condition, officers consider that the proposed development would comply with the policies outlined above.

6.8. **Trees and Biodiversity**

Trees

- 6.8.1 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. 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.
- 6.8.2 Local Plan Policy DM23 (Street side greenness and forecourt greenery) encourages the inclusion of additional street trees.
- 6.8.3 The planning application is supported by an Arboricultural Impact Assessment. This categorises the 17 trees on the site and in the immediate surrounding area in accordance with advice in BS 5837:2012. It identifies the proposed loss of 13 of these trees as follows: Category B – 2; Category C – 8 and Category U – 3. The three Category U trees are outside of the site, in the rear yard of No. 34 High Street.
- 6.8.4 None of the trees on the site are subject to a Tree Preservation Order (TPOs) or Conservation Area designations.

- 6.8.5 Officers consider that the vast majority of trees that would need to be removed to make way for the development are not significant in terms of townscape and amenity value. It is considered that the loss of any trees would be mitigated through the landscape scheme which proposes 34 trees. 21 more than will be removed. The Arboricultural report outlines that the trees have been selected to complement and enhance the landscape and will significantly increase the quantum of trees on and adjacent to the site. As such, there will be a net gain of new healthy trees. The protection of all identified retained trees and planting of new trees is sought as a planning condition of any planning permission.
- 6.8.6 None of the retained trees will be subject to construction within their root protection areas, although special measures are recommended to ensure that these trees are not damaged, and no retained trees require remedial tree work to facilitate the development and to reduce the likelihood of their being subject to excessive pressure after the completion of the development.
- 6.8.7 The planting of new trees will sufficiently mitigate their loss, enhancing the sustainability and biodiversity of the site and contribute to the green infrastructure of the locality. Furthermore, the loss of trees on the site must be weighed in balance against all other material planning benefits of this proposal as noted elsewhere in this report. Having regard to the net gains in trees overall, officers consider that the harm that would be caused by the loss of the trees is strongly outweighed by the realisation of wider planning objectives.
- 6.8.8 Given the above, the proposal accords with London Plan Policy 7.21 and Local Plan Policies DM22 and DM23.

Biodiversity

- 6.8.9 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.
- 6.8.10 London Plan Policies 5.10 (Urban Greening) and 5.11 (Green Roofs and Development Site Environs) call for the provision of green infrastructure on site, including planting, green roofs and green walls. 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. Draft London Plan Policy G6 E outlines proposals which create new or improved habitats that result in positive gains for biodiversity should be considered positively.

- 6.8.11 Local Plan Policy AAP 12 *Improving Access to Nature* requires all major development proposals to incorporate features that support the protection, enhancement, creation and management of biodiversity within the Heart of Harrow.
- 6.8.12 Local Plan Policy DM20 (Protection of Biodiversity and Access to Nature) makes clear that proposals that would be detrimental to locally important biodiversity or that would increase local deficiencies will be resisted. Local Plan Policy DM 21 (Enhancement of biodiversity and access to nature) encourages improvements to biodiversity, including the incorporation of techniques to enhance biodiversity – such as green roofs and green walls.
- 6.8.13 An ecological assessment was undertaken which found that the site had no overriding ecological constraints to the future development of the site. No evidence of bat roosts was found. The overall potential importance of the site to bats was deemed to be negligible due to its urban location and lack of connectivity to other suitable habitat off-site. Existing buildings and trees provide some potential to support common species of nesting birds and to comply with legislation, works could be carried out at suitable times to avoid the nesting season or be carried out under ecological supervision. The report also recommends precautionary measures to control/eradicate small areas of non-native invasive species (butterfly-bush and cotoneaster).
- 6.8.14 The following ecological enhancement are proposed:
- The planting of 34 new trees within the site (resulting in a net gain of 21 trees)
 - The installation of a minimum of four nest boxes suitable for house sparrow (*Passer domesticus*) on one of the proposed new trees within the Site.
 - The use, where possible taking account of maintenance responsibilities, of native species of tree, shrub and other plants or the use of species with a known wildlife value (e.g. nectar-rich species) in the landscaping schemes.
- 6.8.15 The application has been referred to the Council Biodiversity Officer who has outlined concerns with the limited ecological enhancement value proposed on the application site (please refer to comments above). The applicant has sought to respond the comments of the biodiversity officer above, noting the following points:
- Tree planting will ultimately compensate for those to be lost
 - Roof space is limited and the requirements for civic and staff spaces, plant and PV arrays mean that opportunities for green/blue/brown roof space is limited.
 - The nest boxes proposed within the Ecological Assessment Report (PBA, 2017) are to provide ecological enhancement only; with the soft landscape / tree planting considered sufficient to compensate for the loss of a small amount of suitable nesting habitat as a result of the proposed development.
 - With the proposed additional tree planting (see above), this compensatory habitat will be further increased

- Further to this:
 - Considering the proposed use of the roof terrace and tower by staff and for wedding receptions and functions, the applicant is concerned about possible disturbance both to the birds from users of these areas and to users of these areas on account of the birds
 - Given the nature of the façade (the majority of which is heavily glazed), the applicant is also concerned about the risk of incidental bird strike
 - The applicant is also concerned about bird excrement on the building and the additional cost and complexity of integrating bird boxes within the facade system (bespoke cutting of ceramic tiles, consideration of rain screen support, fire treatment, etc).
- Considering the above, the applicant is willing to commit to providing 4 nesting boxes (suitable for house sparrow and tits) rather than the two previously proposed
- Provision could be made within any brown roof area that is provided for invertebrate shelters which could be secured by a condition for an ecological management and maintenance plan
- Opportunities for surface level planting have been maximised, taking account of practical requirements for servicing and on-going maintenance obligations.
- Species specific enhancements measures will also be installed in accordance with the proposed Ecological Mitigation and Management Plan.
- Ecological input will be provided in relation to all of the above to maximise their biodiversity value.
- A green wall (or multiple sections) is incompatible with the developed aesthetic intent. Moreover, it is important to note that green walls require a significant maintenance regime and may be susceptible to vandalism and damage leading to significant ongoing costs. This is considered to be insufficiently robust given the context. Their vertical construction requires specialist irrigation and restricts ease of access. They cannot be easily maintained from the ground. For all these reasons, the applicant considers it more appropriate and of greater benefit to develop further landscaping at ground or terrace level, as outlined above.

6.8.16 Further comments have been received from the Council biodiversity officer in relation to the above comments. Overall, it is considered that the design objectives for what is a restricted space, combined with the design ethos have not incorporated sufficient biodiversity measures from the outset. Although a number of possibilities have been identified the applicant's view is that none of these are desirable or even possible without compromising the design or proposed operation or adding significantly to running costs.

6.8.17 Given the above and at the time of writing this report, officers consider in order to make the development acceptable in biodiversity terms the equivalent of what could have been proposed as positive biodiversity measures for this development are secured elsewhere in Harrow, ideally within the near neighbourhood. This will necessitate some 'biodiversity offsetting' arrangement which could be secured through as an obligation on the applicant through this committee report.

6.8.18 Additionally it is considered, to ensure that the site makes the maximum possible contribution to green infrastructure, consistent with policies and biodiversity objectives, it is recommended that an ecological mitigation and management plan be secured by planning condition to maximise the biodiversity potential of the site, appropriate to its urban setting.

6.8.19 At the time of writing this report additional comments are awaited on this matter and will be reported to members via the committee addendum.

6.9. **Energy, Sustainability and Environment**

6.9.1 Section 10 of the National Planning Policy Framework seeks to promote low carbon and renewable energy, including decentralised energy. This includes requiring local planning authorities to have a positive strategy to delivery low carbon and renewable energy infrastructure and for these matters to be considered as part of any planning application.

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

6.9.3 Policy 5.5 (Decentralised Energy Networks) requires developers to prioritise connection to existing or planned decentralised energy networks where feasible, with Policy 5.6 (Decentralised Energy in Development Proposals) requiring the evaluation of the feasibility of Combined Heat and Power (CHP) systems in new developments and where such a system is appropriate, the examination of opportunities to extend the system beyond the boundary to adjacent sites. The policy also requires development to prioritise connection to existing heating and cooling networks, followed by a site wide CHP network, and lastly communal heating and cooling.

6.9.4 Policy 5.7 (Renewable Energy) requires new development to provide a reduction in expected carbon emissions through on-site renewable energy, where feasible. The supporting text to the policy indicates there is a presumption that the reduction achieved through on-site renewable energy will be at least 20%.

6.9.5 The above requirements are also echoed in policies SI2 and SI3 of the Draft London Plan (2017).

6.9.6 Harrow Local Plan policy largely cross-refers to the London Plan requirements with respect to carbon emissions [see Core Strategy Policy CS1 (T), Policies DM12 Sustainable Design and Layout, DM13 Decentralised Energy, and DM14 Renewable Energy Technology]. Within the Harrow and Wealdstone AAP, Policy

AAP4 (Achieving a High Standard of Development throughout the Heart of Harrow) also cross-refers to the London Plan. Policy AAP10 (Harrow and Wealdstone District Energy Network) recognises that the nature and scale of development envisaged within the AAP area is likely to be conducive to the establishment of a district energy network and requires all new development to prioritise connection to existing or planned decentralised energy networks, where feasible. Where such a network is not feasible at present, development proposals should ensure the design of the development would facilitate connection in the future. Furthermore, the policy requires that all new major development includes on-site heating and cooling networks linking all buildings on-site and prioritising CHP where applicable and served by a single energy centre. The policy establishes a hierarchy for the selection of heating and cooling systems, as follows: connection to existing CCHP/CHP distribution networks; site-wide CCHP/CHP powered by renewable energy; gas-fired CCHP/CHP or hydrogen fuel cells, both accompanied by renewables; communal heating and cooling fuelled by renewable sources of energy; and finally, gas fired communal heating and cooling.

- 6.9.7 The LB Harrow published an Energy Masterplan (EMP) in December 2015. The EMP identifies two heat network cluster opportunities considered to be financially feasible in the short-term. A North cluster - comprising the re-development sites at the current Civic Centre, the Kodak factory and Wealdstone Town Centre and a South cluster - comprising Harrow Metropolitan Centre, Northwick Park Hospital and University of Westminster campuses.
- 6.9.8 The EMP identifies the Peel Road Car Park as possibly forming part of a North Cluster – although the Site has not been identified as a possible site for an energy centre (a site to the south next to the George Gange Way is identified as a possibility). The EMP raises the possibility to extend North Cluster to take in redevelopment of the Council's Grange Farm Estate. In September 2016, Harrow's Cabinet considered a report on establishing an Energy Services Company (ESCO) to deliver heat networks and a separate report on a possible Grange Farm satellite.
- 6.9.9 A report by the Council's consultants WSP Parsons Brinckerhoff in September 2017 sets out scheme development for the proposed northern cluster and identifies a recommended configuration of a scheme to take forward to outline business case and more detailed design. This includes a proposed heat network alignment which shows flow and return pipes (125mm each) extending up Gladstone Way before terminating at a New Civic building. It assumes that the New Civic building would be connected to a network in 2020, although this is not certain, with the delivery of the proposed District Heating Network being subject to a satisfactory business case and detailed design.

Energy

- 6.9.10 The Energy Statement set out the energy strategy for the site. Connection of the proposed New Civic building to the proposed Harrow 'Northern Cluster' [Lot 1] District Heating Network (DHN) will be facilitated by safeguarding a pipeline route along Gladstone Way and providing a point of connection in the New Civic building.

However, given the uncertainty surrounding the delivery of a DHN, the following contingency measures have been adopted:

- Rooftop plant space accommodating a local heating source in the form of modular, gas-fired boilers, to provide a temporary arrangement in the event that heat is not available from the DHN prior to completion and occupancy;
- A local CHP engine and thermal store and a PV array within the rooftop plant space, so that the 35 % emissions reduction target could still be met in the event the DHN is not brought forward.

6.9.11 A site-wide network linking both building (Civic Centre and Ashram Temple) has not been proposed due to the distribution losses and the parasitic electricity consumption. The GLA have requested further information on the anticipated space heating and hot water demand of the Temple in order to verify whether a site-wide network would be of benefit to the site. Additionally the applicant is also required to outline the strategy on site which ensures that the development is designed to allow future connection to a district heating network. These matters will be considered further before the application is referred back to the Mayor under stage 2.

6.9.12 Officers consider that the connection to the District Heating Network (DHN) should be prioritised and pursued. It would be necessary to ensure appropriate safeguarding routes are secured by means of a planning condition. Given the expressed preference to connect to the DHN, the proposed interim solutions are considered to be acceptable. However, in the event that the connection to the DHN did not come forward it would be necessary, to ensure a planning condition was secured to ensure connection to a CHP was installed in the place of any gas fire boilers in accordance with the requirement of the energy hierarchy identified in the Harrow AAP.

6.9.13 Subject to the above mentioned conditions, the proposed strategy for the proposed New Civic building is in accordance with London Plan Policy 5.6 and Local Plan Policies CS2, AAP10 and DM13. The proposed replacement ashram temple is well located to also connect to a DHN and an Energy Statement that supports a subsequent Reserved Matters application will consider the appropriateness of such a connection.

6.9.14 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install Photovoltaic (PV) panels. 120sqm are proposed for the Civic Centre and an assumption of a 10% contribution has been made for the Ashram Temple.

6.9.15 The submitted Energy Statement sets out detailed calculations in relation to the proposed New Civic building. For the proposed replacement ashram temple, the calculations are estimates only, based on the proposed maximum quantum of development, benchmark data and estimated CO2 reductions. Based on this, and no connection to a DHN, the predicted reduction in regulated CO2 emissions (over the 2013 Building Regulations requirements) are as follows:

- 'Lean' (energy efficiency) – 24.6%
- 'Clean' (heating and cooling systems) – 7.6%
- 'Green' (renewable energy technology) – 7.9%

- Overall – 35.9%

6.9.16 The proposed development will therefore meet the target 35% reduction required by London Plan Policy 5.2 and include renewable energy where feasible in accordance with London Plan Policy 5.7 and Local Plan Policy DM14.

Sustainability

- 6.9.17 The National Planning Policy Framework seeks to achieve sustainable development. London Plan Policy 5.3 requires that development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation. It outlines broad considerations that developments should address, including minimising carbon emissions, avoiding overheating, making the efficient use of resources, minimising pollution and the generation of waste, avoiding the impacts from natural hazards, ensuring developments are comfortable and secure, using sustainable materials and promoting and protecting biodiversity and green infrastructure. The Policy notes that all aspects of the London Plan contribute to the sustainability of developments. Core Strategy Policy CS1 and Development Management Policy DM12 (Sustainable Design and Layout) articulates the principles of sustainable development at a local level.
- 6.9.18 The applicant has submitted a detailed Sustainability Statement with the application. The Statement provides an assessment of the scheme against typical sustainability considerations, including energy, water, materials, flood risk and surface water management, waste, pollution, health and wellbeing, land use, ecology and biodiversity, and transport.
- 6.9.19 Many of the issues covered by the Sustainability Statement are assessed in detail through separate reports accompanying the application (i.e. energy, flooding / drainage, transport, air quality, noise assessment, geotechnical assessment, ecological assessment etc). In general terms, the proposal is considered very sustainable. It is located in a highly sustainable location within close proximity to the Harrow and Wealdstone Station and Harrow Metropolitan Centre. It is located on brownfield land and makes efficient use of land through a mix of town centre uses appropriate to its location and setting (subject to assessment of the design aspects of the application / proposal). It seeks to minimise carbon emissions through an energy strategy that applies the energy hierarchy (refer to detailed energy section above).
- 6.9.20 In terms of local procurement, the Council has a target for 15% of all spend to be with local suppliers. The Council has adopted a Social Value policy as part of its procurement process. Under the provisions of the Public Services (Social Value) Act 2012, the Council is required to consider how the economic, social and environmental well-being of the borough might be improved through the procurement of services.
- 6.9.21 In summary as set out in the GLA response further information is required in relation to the provision of a site wide heat network, future connection to a district heat network and details of the CHP and the roof layout of the photo voltaic panels and subject to securing this as well conditions to ensure that the proposals detailed in the energy and sustainability assessment are implemented for the proposed civic

building and a subsequent energy report will be provided for the replacement temple, the scheme is considered to comply with the development plan policies outlined above and is acceptable in energy and sustainability terms.

Air Quality

- 6.9.22 London Plan Policy 7.14 Improving Air Quality provides further detail in relation to the air quality impacts of development. Specifically, it requires: minimisation of increased exposure to poor air quality; provision to address local problems of air quality; measures to reduce emissions during demolition and construction; proposals to be 'air quality neutral' and not to lead to further deterioration in air quality; ensure on-site provision of measures to reduce emissions; and assessment of the air quality implications of biomass boilers. The Mayor's SPGs provide further amplification of air quality issues in relation to this and related London Plan policies.
- 6.9.23 Draft London Plan Policy SI1 requires that development proposals use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. Moreover the development of large scale redevelopment areas such as Opportunity Areas and those subject to Environmental Impact Assessment should propose methods of using an Air Quality Positive approach through new development. All other development should be at least air quality neutral.
- 6.9.24 Local Plan Policy DM1 (Achieving a high standard of development) requires development to achieve a high standard of amenity, making clear that the assessment of amenity will have regard to, amongst other things, the need where relevant for the design and layout of buildings to incorporate measures to mitigate any significant air pollution arising from the future use of the development. Similarly, Local Plan Policy DM12 (Sustainable Design and Layout) states that, where relevant, the design and layout of buildings should incorporate measures to mitigate any significant air pollution arising from the future use of the development.
- 6.9.25 The whole of the Borough has been designated as an Air Quality Management Area (AQMA), due to exceedances of the annual mean objective levels for nitrogen oxide (NO₂) and particulates (PM₁₀).
- 6.9.26 The application is supported by an Air Quality Assessment. The key conclusions of this document can be summarised as follows:
- There are no exceedances of the relevant national air quality objectives within the site and therefore there is no need for specific mitigation in relation to air quality.
 - Energy plant emissions from the proposed New Civic building, from either the boilers only option or alternative boilers and CHP option, are predicted to have an insignificant effect on local air quality, as are the likely emissions from the replacement ashram temple. The associated stacks can therefore be a nominal height above the buildings on which they are located.
 - Energy plant emissions from the New Civic building and replacement Ashram will comply with the requirements of the Mayor of London's SPG on Sustainable Design and Construction and comply with the air quality neutral requirements.

- An air quality neutral assessment for transport has been carried out and emissions and the number of trips generated will be below the benchmark requirements of the Mayor of London's SPG.
- Odour from the commercial kitchen in the proposed New Civic building can be satisfactorily controlled by relevant mitigation once the details of the kitchen operation are known, and the Applicant would accept an appropriately worded condition to reserve details of ventilation arrangements.
- A package of mitigation measures is recommended to minimise the risk of elevated PM10 concentrations and dust nuisance during demolition and construction. The Applicant would accept an appropriately worded condition to secure this.

6.9.27 Notwithstanding the above conclusions, the proposals would also incorporate a number of other measures which would help improve air quality. These include the proposed significant reduction in car parking spaces, the provision of Electric Vehicle Charging Points in the Civic building and improvements to the public realm to encourage walking and cycling. Further mitigation would be provided through a travel plan to encourage modal shift. It is also relevant that the proposal is within an area of very high public transport accessibility which will assist in relation to staff, members of the public and users of the temple accessing the site by means other than private car.

6.9.28 The application has been referred to the Council Environmental Health Department who have advised that the air quality assessment is satisfactory for the operational phase, as is the air quality neutral assessment. Nevertheless, it is considered that there is potential for dust nuisance during the demolition and construction phases. Therefore a condition is required for an air quality and dust management plan to be developed and approved by the council before works start on site.

6.9.29 Subject to the above condition, officers consider that the proposed mitigation measures outlined would help ensure that the proposed development would not result in further deterioration of air quality in the borough and the development would comply with the policies of the development plan outlined above.

Noise and Odour

6.9.30 London Plan Policy 7.15 (Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes) sets out criteria by which development proposals should manage noise. These include avoiding adverse noise impacts on health and quality of life as a result of new development; mitigating and minimising potential adverse noise impacts upon new development; improving the acoustic environment; separating new noise sensitive development from major noise sources or, where separation is not possible, apply good acoustic design principles; and to promote new technologies/improved practices to reduce noise at source. Local Plan Policy DM1 requires a high standard of amenity taking into account, noise, hours of operation and vibration.

6.9.31 The Noise Impact Assessment submitted in support of the application draws on the findings of an environmental sound survey at two positions on the site over a 24-hour period. Assuming the use of conventional building materials during

detailed design, similar activities and hours of uses as existing and building layout, the Assessment finds that the proposed replacement ashram temple is likely to increase the ambient sound level at the nearest sensitive receptor (residential flats at Birchfield on the south side of Palmerston Road) by a maximum of +1 dBA. This is considered to have a negligible impact.

- 6.9.32 Given the nature of the proposed New Civic building (mechanical ventilation/fixed windows) and its proposed relationship with nearby buildings, the break-out noise from this building is likely to be insignificant. The use of the proposed fourth floor terrace is also considered acceptable, subject to a condition managing its use. The Assessment also considers likely noise impact from external building services plant on the roof of the proposed New Civic building. This proposes daytime and night-time noise emission criteria for the nearest noise sensitive receptors
- 6.9.33 In addition, the Assessment concludes that the likely changes in traffic movements is not expected to have a significant effect on nearby noise sensitive receptors
- 6.9.34 Subject to suitable worded conditions in relation to hours of use of the ashram temple, the hours of use of the fourth floor terrace on the civic building as well as banning any form of amplified noise or music from this area and noise restrictions on building services plant, the proposals will safeguard residential amenity and the noise environment of the area and accord with London Plan Policy 7.15 and Local Plan Policy DM1.
- 6.9.35 The Councils Environmental Health Department have outlined that there is potential for odour from any kitchens installed in the development. Therefore a condition is also attached for a kitchen ventilation and extraction scheme to be submitted and approved by the Local Planning Authority before the construction commences.

Contaminated Land

- 6.9.36 Paragraph 109 of the NPPF recognises that there is a role for the planning in the remediation and mitigation of derelict and contaminated land. More specifically, the National Planning Practice Guidance advises that the planning system should ensure that a site is suitable for its new use and prevent unacceptable risk from pollution, and states that as a minimum land should not be capable of being determined as contaminated land under Part 2A of the Environmental Protection Act 1990. Reference is also made to the EU Water Framework Directive.
- 6.9.37 London Plan Policy 5.21 Contaminated Land requires appropriate measures to be taken to ensure that the redevelopment of contaminated land does not activate or spread the contamination. Local Plan Policy DM 15 Prevention and Remediation of Contaminated Land requires the consideration of proposals on land known or suspected to be contaminated to have regard to: the findings of a preliminary risk assessment; the compatibility of the intended use with the condition of the land; and the environmental sensitivity of the site.

- 6.9.38 The application is accompanied by a detailed Ground Risk Assessment which evaluates the risks to potential receptors from the site including humans, controlled waters, ecology, crops/livestock and buildings.
- 6.9.39 A review of potential ground stability hazards has identified a Moderate potential risk associated with shrinking/swelling clays owing to the London Clay present on the site. In addition, there is a High potential risk for areas of worked ground and a Moderate potential risk for unexploded ordnance to be present in the area of the former garages on the northern part of the site.
- 6.9.40 A qualitative risk assessment carried out utilising a Conceptual Site Model of identified 'source-pathway-receptor' linkages identified the following level of risk:
- Site workers – Low;
 - Future Site Users – Very Low;
 - Ground and Surface Waters – Very Low;
 - Ecology and Wildlife – Very Lows; and
 - Built Environment – Very Low.
- 6.9.41 The Council have Environmental Health Department have been consulted and consider remedial or mitigation works are not necessary in this case given the low risk identified. However, they note that there is always the possibility of finding unexpected contamination during demolition and construction operations. As such a planning condition is recommended requiring a scheme for management of unexpected sources of contamination. Subject to this condition, the proposed development would accord with the requirements of the development plan.

6.10. **Infrastructure and Planning Obligations**

Electricity and Gas

- 6.10.1 London Plan Policy 5.4A Electricity and Gas Supply calls for developers to engage with boroughs and energy companies to identify the gas and electricity requirements of their proposals. This is reiterated in policy SI3 of the Draft London Plan (2017). Core Strategy Policy CS1 Z requires proposals to demonstrate that adequate existing or proposed infrastructure capacity exists or can be secured both on and off the site to serve the development.
- 6.10.2 The Foul Water and Utilities Statement submitted in support of the application outlines discussions with UK Power Network and the need for an additional substation to manage expected electricity requirements. The proposed development incorporates a double sub-station (replacing an existing one from the Peel Road Multi-storey Car Park and providing a new one) as part of the proposed cycle parking pavilion building. The Statement also outlines discussions with National Grid about the possible need for the diversion of existing gas mains. As such, the proposals accord with London Plan Policies 5.14 and 5.15 and Local Plan Policy CS1.

Water Use and Waste Water Capacity

- 6.10.3 London Plan Policy 5.14 (Water Quality and Waste Water Infrastructure) and Draft London Plan Policy SI5 requires development to ensure adequate waste water infrastructure capacity London Plan Policy 5.15 (Water Use and Supplies) requires development to minimise the use of mains water by incorporating water saving measures. This is echoed in policy SI5 of the Draft London Plan (2017). Local Plan Policy CS1 Z (Overall Approach) echoes the need for proposals to demonstrate adequate existing or proposed infrastructure capacity.
- 6.10.4 The Sustainability Statement submitted in support of the application outlines the measures to be incorporated within the proposed New Civic building to minimise water usage. The Foul Water and Utilities Statement submitted in support of the application makes clear that Thames Water Utilities Limited has confirmed that its foul network in the area has capacity for the proposed foul water loads of both the proposed New Civic and replacement temple buildings. As such, the proposals accord with London Plan Policies 5.14 and 5.15 and Local Plan Policy CS1.

Waste and Recycling

- 6.10.5 London Plan Policy 5.17(Waste Capacity) requires adequate provision during for waste and recycling storage and collection and Policy 5.18 (Construction, Excavation and Demolition Waste) requires developers to produce Site Waste Management Plans to arrange for the efficient handling of construction, excavation and demolition waste and materials.
- 6.10.6 London Plan Policy 5.3 (Sustainable Design and Construction) requires development to minimise the generation of waste and maximise reuse or recycling. This is echoed in Policy SI7 of the Draft London Plan (2017). These sentiments are echoed in Core Strategy Policy CS1 X (Overarching Principles).
- 6.10.7 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.
- 6.10.8 The Joint West London Waste Local Plan (July 2015) outlines the vision and strategy for managing waste in the West London area until 2031. It identifies the following targets to be achieved by2020:
- 95% recycling and re-use of construction, demolition and excavation (CD&E) waste and 80% recycling of that was as aggregates;

- 50% recycling/composting/re-use of municipal solid waste (MSW); and
- 70% recycling/composting/re-use of commercial and industrial waste.

- 6.10.9 With regard to operational waste and recycling, the LPA currently has no specific guidance relating to commercial waste storage requirements. Volumes have therefore been estimated through reference to the LB of Hackney's 'Refuse and Recycling Storage Guidance'. Based on two collections per week, this guidance calls for the proposed New Civic building to accommodate 4 x 1,100 litre bins for residual waste and 4 x 1,280 litre bins for recycling waste. These will be accommodated on the ground floor of the proposed New Civic, next to the proposed northern loading bay on Gladstone Way, which will be used by refuse vehicles. Details of the waste and recycling facilities for the proposed replacement ashram temple will be included with the subsequent Reserved Matters application. It is expected that this will be collected from the proposed southern loading bay on Gladstone Way.
- 6.10.10 The details of the operational and recycling arrangement have been referred to the Council waste department who have raised no objection to the proposals.
- 6.10.11 With regard to demolition The submitted Framework Site Wide Waste Management Plan (SWWMP) aims to ensure that:
- Construction, excavation and demolition materials are managed efficiently;
 - Waste is disposed of legally and fly tipping is reduced; and
 - Materials reduction, reuse, recycling and recovery is increased.
- 6.10.12 A condition is recommended to secure a detailed site waste management plan to ensure the above objectives are met and subject to this the proposal would accord with the policies of development plan.

Community Infrastructure Levy

- 6.10.13 On 1st April 2012 the Mayor of London's Community Infrastructure Levy (CIL) came into force and applies to all development except medical and educational uses. In Harrow, the Mayor's CIL is charged at a rate of £35.00 per square metre. It used to help fund the Crossrail infrastructure project. It is calculated that the proposal would generate an estimated liability of £273, 280 under the Mayor's CIL.
- 6.10.14 Harrow adopted its CIL on 16 September 2013 and it applies Borough wide for certain uses of over 100sqm gross internal floor space. The CIL was examined by the Planning Inspectorate and found to be legally compliant. It has been charged from the 1st October 2013. However the CIL does not apply to B1 and D1 uses and there is no charge in this case.

Planning Obligations

- 6.10.15 London Plan Policy 8.2 Planning Obligations states that planning obligations should address strategic as well as local priorities and that affordable housing

and public transport improvements should be given the highest importance. Draft Policy DF1 provides further guidance on the consideration of planning obligations on development proposals.

- 6.10.16 Core Strategy Policy CS1 AA requires all development to contribute to the delivery of strategic infrastructure identified in Harrow's Infrastructure Delivery Plan. Local Plan Policy DM 50 Planning Obligations undertakes to seek s.106 planning obligations to secure the provision of affordable housing and other infrastructure needed to mitigate site specific impacts of the proposed development.
- 6.10.17 Pursuant to the aforementioned policy framework the Council has published a Planning Obligations supplementary planning document (SPD).
- 6.10.18 As outlined above in the introduction of this report, the planning application comprises 'council own development' and is subject to Regulation 3 of the Town and Country Planning General Regulations 1992. The Council cannot enter in to a legal (Section106) agreement with itself and some matters that would normally be secured by way of planning obligations need to be secured by other means. The proposed strategy for securing these points is set out in the introduction above.

Land Ownership

- 6.10.19 The heads of terms between the Council and the ISSC for an exchange of land and the provision of a replacement ashram temple are summarised in paragraph 6.2.39 of this report. At the time of writing this report the Council has executed the agreement and one of the ISSC trustee has signed the agreement. Nevertheless, the agreement has not yet been completed. Subject to the agreement being signed prior to the determination of this application, officers consider the land exchange agreement to be sufficiently robust and would therefore not require the ISSC as a current land owner within the site to replicate the terms of the land exchange in a separate section 106 agreement with the Council.

Decentralised Energy Networks

- 6.10.20 London Plan Policy 5.6 Decentralised Energy in Development Proposals states that, where a new CHP system is found to be appropriate for a development, opportunities to extend the system beyond the site boundary should also be examined. The Council is committed to the delivery of a district-wide decentralised energy network within the Heart of Harrow. Local Plan Policy AAP 10 Harrow & Wealdstone District Energy Network requires major development proposals to within the Heart of Harrow to ensure that the design of the development would facilitate future connection to such a district-wide network. The SPD calls for the developer to carry out any on and/or off site works and, where connection to a network is required, a contribution towards the cost incurred by the Council (or its agent) of any off site works.
- 6.10.21 Connection of the proposed New Civic building to the proposed Harrow District Heating Network (DHN) will be facilitated by safeguarding a pipeline route along Gladstone Way and providing a point of connection in the building. Officer accept

the use of gas-fired boilers, to provide a temporary arrangement in the event that heat is not available from the DHN prior to completion and occupancy and a local CHP engine, thermal store and a PV array,

- 6.10.22 Nevertheless, a planning condition is considered necessary to ensure that an agreed route for infrastructure to the boundary of the site should be safeguarded to ensure it would be technically feasible to connect to the proposed DHN. Moreover, in the event that the DHN did not become available, it would be necessary to ensure that the applicant would install a CHP system within a specified time period in order to comply with the energy hierarchy outlined in the development plan.

Skills and Training

- 6.10.23 London Plan Policy 4.12 (Improving opportunities for all) and Local Plan Policy support the provision of skills and training opportunities and London Plan Policy 8.2 (Planning Obligations) affords importance in securing obligations to learning and skills development.
- 6.10.24 Local Plan Policy DM 31 (Supporting Economic Activity and Development) makes clear that, amongst other things, the Council will support proposals for enabling mixed-use development where this is necessary to facilitate the intensification, renewal and modernisation of existing industrial and business floorspace.
- 6.10.25 Harrow's Planning Obligations & Affordable Housing SPD (October 2013) seeks to secure various employment and training measures from major developments, including, where appropriate, Construction Training, General Employment and Training Contributions, Securing Employment Premises; and Use of Local Suppliers.
- 6.10.26 The Council's Economic Development Department have outlined that they expect:
- the contractor to work closely with the council's employment and training programme (Xcite) to ensure that local residents have the opportunity to access construction and related employment opportunities that become available during the construction phase of the development, to agree an action plan (including activities to maximise local benefit, targets, monitoring arrangements and review processes)
 - the contractor to work closely with Procurement and Economic Development to ensure that Harrow businesses benefit from supply chain opportunities. The developer/contractor involved in the development of the site meets the Council's Social Value targets in any contracts agreed with the Council. These targets will be included in any procurement contracts that the council let for the development of the site.
- 6.10.27 The applicant has outlined a commitment to secure skills training and apprenticeships by incorporating requirements in to contracts with contractors. In addition the applicant intends to encourage local procurement with the aim of meeting the Council's 15% target of spend with local suppliers by incorporating requirements in to contracts with contractors. It is recommended that this is included as an agreed committee resolution to ensure the applicant works towards this target.

Travel Plan and Transport Infrastructure

- 6.10.28 The SPD makes it clear that whilst general improvements to transport infrastructure are to be funded by the CIL and other sources, additional works required to accommodate or mitigate the impact of a proposed development should be funded by the developer.
- 6.10.29 A planning condition is considered necessary to ensure the implementation of appropriate travel planning activities in relation to the Council's new offices and for the ISSC to develop a travel plan for the proposed ashram temple.
- 6.10.30 Transport mitigation measures and off-site highway works including financial contributions will be required as set in the introduction of this report.

Public Art

- 6.10.31 The provision of public art is supported by London Plan Policy 7.5 Public Realm and Local Plan Policy AAP 1 Development within Harrow town centre. The SPD states that all major development that has a significant impact on its physical environment and setting will be required to make provision for public art. Thus, the installation of an appropriate piece of public art within or adjacent to the site is considered to be necessary to comply with the relevant provisions of these development plan policies and the SPD.
- 6.10.32 In accordance with the SPD a contribution of £50,000 for public art is sought. It is envisaged that this sum will be transferred to the Council to run a transparent process for commissioning a public art work the exact location to be agreed with the applicant.

7. CONCLUSION AND REASONS FOR APPROVAL

- 7.1. Whilst not identified as an opportunity site in the AAP, the Site is within an Opportunity Area and District Town Centre, where London Plan Policy 2.13 and Local Plan Policies CS1 and AAP3 strongly support development to be located. The proposal to locate the New Civic building here follows a thorough appraisal of alternative sites. The Gladstone Way site was chosen partly because of the positive regenerative benefits that it will have on Wealdstone Town Centre. The proposed development is fully aligned with the Council's regeneration and growth strategies and with the key relevant development plan policies referred to above.
- 7.2. The proposed New Civic offices and associated civic facilities and replacement ashram temple are 'main town centre uses' and are of an appropriate scale for Wealdstone District Town Centre. The proposed surface car park will provide sufficient car parking to support the vibrancy, vitality and viability of the town centre, whilst encouraging sustainable modes of travel and providing opportunities for occasional meanwhile town centre uses.

- 7.3. The proposed parameters for the outline element of the development requires the re-provision of at least the same amount of D1 floorspace as the existing place of worship (321sqm), ensuring that there will be no net loss of community floorspace. They also allow for a significantly larger place of worship (up to 1,672sqm), which would be a welcome benefit to religious and cultural life in Wealdstone.
- 7.4. The proposed buildings are considered to be of high quality architectural merit and the development as a whole, displays a high quality approach to its design. It would introduce an exciting new marker towards the approach to Wealdstone Town Centre and raise the quality of the local townscape. It would make a significant contribution to economic development and regeneration objectives of the Council.
- 7.5. The proposals will deliver a substantial uplift in the quality of the public realm on site, whilst addressing existing anti-social behaviour. They have also been developed carefully to integrate with forthcoming improvements in the town centre, including the Wealdstone Improvement Scheme, potential highway improvements and a future District Energy Network. The proposed high-quality landscaping and public realm works will help transform this part of Wealdstone Town Centre in to a more attractive, safer and inclusive place. It will significantly improve east-west permeability and connectivity for pedestrians and cyclists and improve the setting of the locally listed building at No.36 High Street.
- 7.6. The car parking for the proposed New Civic building is within the relevant London Plan car parking standards (with the number of motorcycle spaces exceeding Harrow standards). It does, however, represent only about 5% of the staff car parking that is available at the existing Civic Centre. Given this, the submitted Travel Plan sets out measures and targets for encouraging the required change in staff travel behaviour. The Wealdstone Town Centre Transport Study has established the need for 60 public car parking spaces to cater for the existing demand for town centre use. The proposed 57 spaces will be augmented by 12 spaces on the former 'Magic Carwash' site. Together, this would provide 69 public spaces, which is more than the identified need. The two accessible car parking spaces that are expected to be provided as part of the proposed replacement ashram temple is in accordance with the relevant minimum accessible spaces for the proposed maximum floorspace (1,672sqm).
- 7.6.1 LBH Highways consider that the level of parking proposed can be supported subject to careful management and mitigation through the Transitional Travel Plan, a detailed Full Travel Plan for the office an effective car park management plan as well as an investigation into an extension or extended controls of the surrounding CPZs.
- 7.7. The proposed new buildings have been carefully located on the site to safeguard the amenity of existing and future nearby residents and will have an acceptable impact in terms of daylight and sunlight, visual impact, outlook and privacy.
- 7.8. For all these reasons and weighing up the development plan policies and proposals and other material considerations, it is recommended that the planning committee make a resolution to grant planning permission, subject to the completion securing the above stated financial contributions, stage 2 referral to the Mayor of London (GLA) and the following conditions:

APPENDIX 1: Conditions and Informatives

Conditions relating to the 'Full' element

1. Timing

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

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

2. Approved Plans and Documents

Save where varied by other planning conditions comprising this permission and unless otherwise agreed in writing by the local planning authority, the development shall be carried out in accordance with the approved drawings and documents:

REASON: To ensure that the development is carried out to the highest standards of architecture and materials in accordance with Policies 7.6 and 7.7 of the London Plan (2015) and Policies AAP 4 and AAP 6 of the Local Plan (2013) and for the avoidance of doubt and in the interest of proper planning.

PRE-COMMECEMENT (INCLUDING DEMOLITION)

3. Demolition and Construction Logistics and Management Plan

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

- a) Detailed timeline for the phases and implementation of the development
- b) The parking of vehicles of site operatives and visitors;
- c) Loading and unloading of plant and materials;
- d) Storage of plant and materials used in construction the development;
- e) The erection and maintenance of security hoardings including decorative displays and facilities for public viewing;
- f) Wheel washing facilities;
- g) A scheme for recycling/disposing of waste resulting from demolition and construction works;
- h) Measures for the control and reduction of dust;
- i) Measures for the control and reduction of noise and vibration; and
- j) Measures to ensure that pedestrian access to the residential flats on the upper floors of No. 34 the High Street is maintained at all times.

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

REASON: To ensure that measures are put in place to manage and reduce noise and vibration impacts during demolition and construction and to safeguard the amenity of

neighbouring occupiers, in accordance with Local Plan Policies DM1 and DM43 and Policies 7.14 and 7.15 of the London Plan (2016) and to ensure that the transport network impact of demolition and construction work associated with the development is managed in accordance with Policy 6.3 of the London Plan (2016), this condition is a PRE-COMMENCEMENT condition.

4. Construction and Site Waste Management Plan

No development shall take place, including any works of demolition, until a construction and site waste management plan, setting out arrangements for the handling of excavation, demolition and construction waste arising from the development, and to make provision for the recovery and re-use of salvaged materials wherever possible, has been submitted to and approved in writing by the local planning authority.

The development shall be carried out in accordance with the approved plan or any amendment or variation to it as may be agreed in writing by the local planning authority.

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

5. Non-Road Mobile Machinery

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

REASON: To ensure that the development would not result in a deterioration of air quality in accordance with, Local Plan Policies AAP 4 and DM1 and Policy 7.14 of the London Plan (2016) to ensure that suitable vehicles would be used during the construction process, this is a PRE-COMMENCEMENT CONDITION.

6. Tree Protection

No development shall take place, including any works of demolition, until a Tree Protection Plan (TPP) in respect of the existing trees to be retained on the site has been submitted to and approved in writing by the local planning authority.

The TPP shall follow the recommendations set out in BS 5837:2012 (Trees in relation to design, demolition and construction – Recommendations). The TPP shall also clearly indicate on a dimensioned plan superimposed on the building layout plan and in a written schedule details of the location and form of protective barriers to form a construction

exclusion zone, the extent and type of ground protection measures, and any additional measures needed to protect vulnerable sections of trees and their root protection areas where construction activity cannot be fully or permanently excluded.

REASON: To safeguard the health and safety of trees during building operations and the visual amenities of the area generally and to comply with Local Plan Policy DM22 and Policy 7.21 of the London Plan (2016).

7. Non-Road Mobile Machinery

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

REASON: To ensure that the development would not result in a deterioration of air quality in accordance with, Local Plan Policies AAP 4 and DM1 and Policy 7.14 of the London Plan (2016) to ensure that suitable vehicles would be used during the construction process, this is a PRE-COMMENCEMENT CONDITION.

8. Tree Protection

No development shall take place, including any works of demolition, until a Tree Protection Plan (TPP) in respect of the existing trees to be retained on the site has been submitted to and approved in writing by the local planning authority.

The TPP shall follow the recommendations set out in BS 5837:2012 (Trees in relation to design, demolition and construction – Recommendations). The TPP shall also clearly indicate on a dimensioned plan superimposed on the building layout plan and in a written schedule details of the location and form of protective barriers to form a construction exclusion zone, the extent and type of ground protection measures, and any additional measures needed to protect vulnerable sections of trees and their root protection areas where construction activity cannot be fully or permanently excluded.

REASON: To safeguard the health and safety of trees during building operations and the visual amenities of the area generally and to comply with Local Plan Policy DM22 and Policy 7.21 of the London Plan (2016).

NO COMMENCEMENT – APART FROM DEMOLITION

9. Surface Water Drainage

No development shall take place, other than works of demolition, until details of works for the disposal of surface water, including surface water attenuation and storage, have been submitted to, and agreed in writing by, the local planning authority. The submitted details

shall include measures to prevent water pollution and details of SuDS and their management and maintenance.

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

REASON: To ensure that the development achieves an appropriate greenfield run-off rate in this critical drainage area and to ensure that sustainable urban drainage measures are exploited, in accordance with London Policies 5.13 & 5.15 of the London Plan (2015) and Policy AAP 9 of the Local Plan (2013). To ensure that measures are agreed and built-in to the development to manage and reduce surface water run-off, this condition is a PRE-COMMENCEMENT condition.

10. Foul Water Drainage

No development shall take place, other than works of demolition, until a foul water drainage strategy, has been submitted to and agreed in writing by the local planning authority. The development shall not be occupied until the agreed drainage strategy has been implemented.

REASON: To ensure that there would be adequate infrastructure in place for the disposal of foul water arising from the development, in accordance with Policy 5.14 of the London Plan (2016) and Harrow Core Strategy Policy CS1, and to ensure that the development would be resistant and resilient to foul water flooding in accordance with Policy AAP 9 of the 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.

11. Detailed Highway Design

No development shall take place, other than works of demolition, until the detailed design of highway works within the site along Gladstone Way and Peel Road to prevent conflict between pedestrian and cyclists and service vehicles have been submitted and agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with the agreed details and thereafter retained.

REASON: To ensure the safety of all users on the highway users in accordance with policy DM 42 of the Harrow Development Management Policies Local Plan (2013).

12. Levels

Notwithstanding the details shown on the drawings, no site works or development shall commence (other than demolition works) until details of the levels of the building(s), road(s) and footpath(s) in relation to the adjoining land and highway(s), and any other changes proposed in the level of the site, have been submitted to, and agreed in writing by the local planning authority. The development shall be carried out in accordance with the details so agreed.

REASON: To ensure that the works are carried out at suitable levels in relation to the highway and adjoining properties in the interests of the amenity of neighbouring residents,

the appearance of the development, drainage, gradient of access and future highway improvement in accordance with Policies AAP 1, AAP 4, AAP 9, and AAP19 of the Harrow and Wealdstone Area Action Plan (2013) and policies DM 1 and DM 42 of the Harrow Development Management Policies Local Plan (2013). To ensure that appropriate site levels are agreed before the superstructure commences on site, this condition is a PRE-COMMENCEMENT condition.

NO DEVELOPMENT ABOVE GROUND FLOOR SLAB

13. External Materials

Notwithstanding the details shown on the approved drawings, the New Civic office building hereby approved shall not progress beyond the ground floor slab level until samples of the materials to be used in the construction of the external surfaces noted below have been submitted to, and agreed in writing by, the local planning authority:

- a) facing materials for the building;
- b) windows/doors for the building.
- c) Ground surfacing

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

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

14. Hard and Soft Landscaping

The New Civic office building hereby approved shall not progress beyond the ground floor slab level until a scheme for the hard and soft landscaping details for the ground level public realm areas have been submitted to, and agreed in writing by, the local planning authority. 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. Hard landscaping details shall include details of hard surfacing materials, raised planters and external seating, proposed finished levels, boundary treatment and means of enclosure to circulation areas including hand rails and railings and any minor artefacts and structures.

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

REASON: To ensure that the development makes provision for 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 Local Plan Policies CS.1B, AAP1, AAP4 and Policy 7.4B of The London Plan (2016) and to ensure that the development makes appropriate provision for the protection, enhancement, creation and management of biodiversity in accordance with Local Plan Policies AAP 12 and DM 21.

15. External Lighting

Notwithstanding the details set out in the Lighting Statement (December 2017) and drawings GAP 1001P Rev F, GAP 3001P Rev C, GAP 4101P Rev E, GAP 4101P Rev E, GAP 4201P Rev G, GAP 4301P Rev C and HNC-NC-07-801-Rev 1 – Northern Entrance Bay Study, the New Civic office building hereby approved shall not progress beyond the ground floor slab level until details of the lighting of all public realm and other external areas (including buildings) within the site has been submitted to, and agreed in writing by, the local planning authority.

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

REASON: To ensure that the development incorporates lighting that contributes to Secured by Design principles, achieves a high standard of residential quality in accordance with Local Plan Policy AAP 4 and to ensure that the development does not unduly impact on the biodiversity potential of the site in accordance with Local Plan Policy DM 20.

16. Ecological Mitigation and Management Plan

The New Civic office building hereby approved shall not progress beyond the ground floor slab level until an Ecological Mitigation and Management Plan (EMMP) has been submitted to and approved in writing by the local planning authority. The EMMP shall:

- a) Set out details of the two bird nesting boxes to be installed in proposed Tress PT13 and PT14 (as identified on drawing GA_P_4201P_Rev_G)
- b) Identify suitable proposed trees for the installation of two further bird nesting boxes and set out details of these boxes
- c) Set out other measures to help to maximise the biodiversity value of the scheme, such as the inclusion of a brown roof and the use of native species planting / seed mixes appropriate to the urban setting of the site
- d) The removal and treatment of existing cotoneaster

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 in accordance Local Plan Policies AAP 12 and DM 21.

17. Combined Heat and Power

The New Civic office building hereby approved shall not progress beyond the ground floor slab level until a specification of any proposed combined heat and power plant to include any drawings of the flue, and arrangements for testing the emissions from the plant, have been submitted to, and agreed in writing by, the local planning authority. The aforementioned arrangements shall include a timetable for testing the plant and for reporting the test results to the local planning authority for the authority's approval in writing.

Any combined heat and power plant shall be installed and thereafter retained in accordance with the specification so agreed, and the testing shall be carried out in accordance with the arrangements so agreed.

In the event that the local planning authority does not approve the test results, such remedial action as shall be specified in writing by the local planning authority shall be carried out no later than a date as shall be specified in writing by the local planning authority.

REASON: To ensure that the emissions from the combined heat and power system comply with the standards published at Appendix 7 of the Mayor of London's Sustainable Design & Construction supplementary planning document (2014) (or such appropriate standards as may supersede them) and that the development is consistent with the provisions of Policy 7.14 of the London Plan (2015).

PRIOR TO OCCUPATION

18. Secured by Design

Prior to the first occupation of the development, evidence of Secured by Design Certification shall be submitted and approved in writing by the Local Planning Authority. The development shall be retained in accordance with the approved details.

REASON : In the interests of creating safer and more sustainable communities and to safeguard amenity by reducing the risk of crime and the fear of crime, in accordance with Policies 7.3 and 7.13 of the London Plan (2016) and Policy AAP 4 of the Local Plan (2013), and Section 17 of the Crime & Disorder Act 1998.

19. Mechanical Ventilation

The New Civic office building hereby approved shall not progress beyond the ground floor slab level until details of extraction flues and ventilation systems to control odour from the kitchen on the fourth-floor of the building have been submitted to and approved in writing by the Local Planning Authority.

The application shall be implemented in full accordance with such details before the kitchen is first brought in to use and be maintained thereafter.

REASON: To ensure that the development safeguards residential amenity and is carried out to the highest standards of architecture and materials in accordance with Local Plan Policy DM1 and Policies 7.6 and 7.7 of the London Plan (2015) and Policies AAP 4 and AAP 6 of the Local Plan (2013).

20. Landscaping Roof Terrace

The New Civic office building hereby approved shall not be occupied until details of the layout and hard and soft landscaping details of the fourth-floor roof terrace have been submitted to, and agreed in writing by, the local planning authority. Hard landscaping details shall include: hard surfacing materials, raised planters, external seating and any

railings/screening to the perimeter. Soft landscaping details 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 development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development makes provision for soft landscaping which contributes to the creation of a high quality, accessible, safe and attractive roof space to ensure a high standard of design, layout and amenity in accordance with policy 7.4B of The London Plan (2015), policy CS.1B of the Harrow Core Strategy (2012) and policies AAP 1 and AAP 4 of the Harrow and Wealdstone Area Action Plan (2013) and to ensure that the development makes appropriate provision for the protection, enhancement, creation and management of biodiversity within the Heart of Harrow, in accordance with Policies AAP 12 and DM 21 of the Local Plan (2013).

21. Pedestrian Signage

The New Civic office building hereby approved shall not be first occupied until a pedestrian signage strategy has been submitted to, and agreed in writing by, the local planning authority. The strategy shall set out proposed signage within the site and surrounding area

Signage in accordance with an approved strategy shall be erected before the building first comes in to public use.

REASON: To direct visitors to the New Civic office building to the entrance that is most appropriate to their needs and to help ensure an inclusive, legible pedestrian and cycling environment in accordance with policy DM 2 of the Harrow Development Management Policies Local Plan (2013).

22. Soft Landscaping Management and Maintenance

The development hereby approved shall not be occupied until a scheme for the on-going management and maintenance of the soft landscaping within the development, to include a landscape management plan, including long term design objectives, management responsibilities and maintenance schedules for a minimum period of 5 years for all landscape areas, and details of irrigation arrangements and planters, has been submitted to, and agreed in writing by, the local planning authority.

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

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes (i) to the creation of a high quality, accessible, safe and attractive public realm and (ii) to the enhancement, creation and management of biodiversity with the Heart of Harrow, in accordance with Policies DM22, AAP 7 and AAP 12 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.

23. Car Park Management Plan – New Civic Office Building

The New Civic office building hereby approved shall not be first occupied until an Office Parking Management Plan has first been submitted to, and agreed in writing by, the local planning authority. The plan shall set out the following:

- a. Details of the 20% of general spaces that are to be 'active' electric vehicle charging point spaces and 10% of general spaces that are to be 'passive' electric vehicle charging point spaces
- b. Mechanism for increasing the number of general spaces that have an 'active' electric vehicle charging point if monitoring demonstrates additional demand.
- c. Details of the pool car booking and management system.
- d. Details of the allocation and management of the accessible car parking spaces.
- e. Details of roller shutters, gates or other means of controlling access to the basement car park.

The development shall be carried out and operated only in accordance with the plan so agreed.

REASON: To ensure that the car parking is managed in a satisfactory manner and that sufficient electric vehicle charging points are provided in accordance with Local Plan Policies AAP 19 and DM42 and Policy 6.13 of the London Plan (2016).

24. Access and Car Park Management Plan – Public Car Parking

The public car parking hereby approved shall not be first brought in to use until a Public Car Park Management Plan has first been submitted to, and agreed in writing by, the local planning authority. Notwithstanding what is shown on the approved drawings, the plan shall set out the following:

- a. Details of the vehicular access (including signage and line markings) that facilitate a right-in and right-out movements
- b. Details of transitional arrangements for the surface car park.
- c. Details of a vehicular access height restriction barrier;
- d. Public opening hours; and
- e. Maximum length of stay and charging regime.

The development shall be carried out and operated only in accordance with the plan so agreed.

REASON: To ensure that the car parking is accessed and managed in a satisfactory manner and which allows for possible future highway improvement scheme in accordance with Local Plan Policy AAP 19, and Policy 6.13 of the London Plan (2016).

25. Delivery and Servicing Plan

The office building hereby approved shall not be first occupied until a Delivery and Servicing Plan has first been submitted to, and agreed in writing by, the local planning authority. The Plan will include setting out permitted delivery times.

Use of the office building shall adhere to the plan so agreed.

REASON: To ensure that the transport network impact of deliveries associated with the New Civic office building is managed in accordance with Local Plan Policy DM1 and Policy 6.3 of the London Plan (2016).

26. Cycle Parking

The development hereby permitted shall not be occupied until details of the cycle parking spaces on the site have been submitted to and approved in writing by The Local Planning Authority. The cycle parking shall be implemented on site in accordance with the approved details and shall be retained for the lifetime of the development.

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

POST OCCUPATION

27. Travel Plan

Within 6 months of the first occupation of the development a Full Office Travel Plan shall be submitted to the Local Planning Authority in writing to be agreed. The submitted Travel Plan shall include that:

- A) A Baseline Survey shall be undertaken within 6 months of First Occupation of the Development and completed. Further Monitoring Surveys shall thereafter be undertaken during the same calendar month as the Baseline Survey, for a period of not less than five years in the 3rd and 5th years from First Occupation of the Development.
- B) Within two months of carrying out the Monitoring Surveys, the Owner shall submit a Monitoring Report to the Council.
- C) The Owner undertakes that it will each year submit an Annual Monitoring Report to the Council which shall demonstrate how the Travel Plan has been implemented during the previous 12 - 24 month period to include:
 - a. Measures introduced and actions taken to promote the Travel Plan.
 - b. A statistical summary of the Modal Split of Employees/ Residents/ Users disclosed by the Monitoring Surveys.
 - c. The progress of the Travel Plan in achieving targets; and
 - d. in the event that targets as set out in the Travel Plan are not achieved identifying any proposed amendments to the Travel Plan together with a plan for future actions to be implemented.
 - e. And any measures identified in part (d) shall be submitted to the Council for agreement.

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

28. Energy and Sustainability

The development shall be undertaken in accordance with the approved Sustainability Statement and Energy Strategy. Within 3 months (or other such period agreed in writing by the Local Planning Authority) of the final completion of the development a post construction assessment shall be undertaken demonstrating compliance with the approved Energy Statement, Ref 40451 Rev P4, dated December 2017 which thereafter shall be submitted to the Local Planning Authority for written approval.

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 policy AAP 4 of the Harrow and Wealdstone Area Action Plan (2013).

29. Decentralised Energy Network 1

The office building hereby permitted shall be connected to a District Heating Network pursuant to the Councils Energy Masterplan within 6 months of the District Heating Network being established. In the event that the District Heat Network is not established, the developer/owner shall submit details of a local Combined Heat and Power Plant (CHP), thermal store and PV array to be installed in the building within 3 years of practical completion of the building to be agreed in writing by the Local Planning Authority. The approved details shall be installed within 12 months of the date of approval and shall thereafter be retained in accordance with the arrangements so agreed.

REASON: To ensure the delivery of a sustainable development in accordance with the National Planning Policy Framework 2012, policies 5.5 and 5.6 of The London Plan (2016) and policy AAP 10 of the Harrow and Wealdstone Area Action Plan (2013).

COMPLIANCE

30. Decentralised Energy Network 2

A pipeline route shall be safeguarded within the application site from a point of connection in the building to facilitate a future connection to a local District Heating Network.

REASON: To ensure the delivery of a sustainable development in accordance with the National Planning Policy Framework 2012, policies 5.5 and 5.6 of The London Plan (2016) and policy AAP 10 of the Harrow and Wealdstone Area Action Plan (2013).

31. Travel Plan Implementation

Unless otherwise agreed in writing by the local planning authority, the New Civic office building shall be operated in accordance with the approved Office Travel Plan submitted under condition 26 in accordance with the timescales contained in the Travel Plan (or as amended by the agreement between the Council and the Owner in writing). The Owner shall use all reasonable endeavours to ensure that the Travel Plan (or Final Travel Plan) is complied with and that each of the targets contained in the Travel Plan are met. The applicant shall continue to implement and observe the requirements and obligations set out in the Travel Plan (or such amended plan as may be agreed between the applicant

and Council) for a period of not less than five years following First Occupation of the Development. If monitoring demonstrates that there is the need for long-stay cycle parking spaces in addition to those required by Condition 31, the applicant shall provide up to an additional 14 spaces in locations to be agreed in writing by the local planning authority within 12 months of the need being identified.

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

32. Car and Cycle Parking

The basement car parking (34 car parking spaces and 4 motorcycle spaces), cycle parking pavilion (100 long-stay cycle parking spaces including at least 5 non-standard large cycle parking spaces) and surface level visitor cycle parking (22 cycle parking spaces) shown on the approved drawings shall be provided and made ready for use before the office building is first occupied and shall be retained thereafter.

REASON: To accord with Local Plan Policy DM42 and Policy 6.13 of the London Plan (2016).

33. Use of Roof Terrace

Unless otherwise agreed in writing by the local planning authority, the fourth-floor roof terrace hereby approved shall only be open for use between: 08.00 and 20:00 on Mondays to Sundays (including public holidays).

REASON: To ensure that the operation of the ground floor uses is compatible with residential amenity.

34. Noise – Mechanical Plant

The rating level of noise emitted from any plant, machinery and equipment on the site, including within the approved electrical substation, shall be lower than the existing background level by at least 10 dB(A). Noise levels shall be determined at one metre from the boundary of the nearest noise sensitive premises. The measurements and assessments shall be made in accordance with BS 4142:2014. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which the plant is or may be in operation.

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

REASON: To ensure that the development achieves a high standard of amenity for future occupiers of this and the neighbouring buildings, in accordance with Local Plan Policy DM1 and Policy 7.6 of the London Plan (2016).

35. Implementation of hard and soft Landscaping

All hard landscaping shall be carried out prior to the New Civic office building or the public car parking being brought in to use 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 New Civic office building being brought in to use 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 Policies DM22, AAP 7 and AAP 12 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.

36. Unexpected Contamination

In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken and where remediation is necessary a remediation scheme must be prepared which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority.

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 receptors in accordance with Policy 5.21 of the London Plan 2016 and Policy DM 15 of the Harrow Development.

37. Protection for Breeding Birds

If the development hereby permitted commences during the bird breeding season (March to August) inclusive trees and buildings in the vicinity of the site shall be examined for nests or signs of breeding birds. Should an active bird's nest be located, time must be allowed for birds to fledge and the nest should not be disturbed during building works.

REASON: To safeguard the ecology and biodiversity of the area in accordance with policies DM 21 and DM 22 of the Harrow Development Management Policies Local Plan (2013).

38. Architecture Retention

The applicant shall use reasonable endeavours to ensure that the scheme Architects continue to be employed as the lead design architect until Practical Completion to produce all drawings in respect of all design and materials planning permission conditions including 10, 12 and 14 and any non-material and minor amendments changes which may have an impact on the planning permission drawings. Where necessary the Architects shall produce drawings of any necessary revisions. Where the Architect does not produce the drawings submitted in support of an application to discharge a condition or any revisions, the drawings should be endorsed and agreed by the scheme Architect before they are submitted to the Council for approval.

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

39. Noise from the fourth floor Terrace

No music or any other amplified sound caused as a result of this permission including from the use of the fourth floor roof terrace, shall be audible at the boundary of any residential premises either attached to, or in the vicinity of, the premises to which this permission refers.

REASON: To ensure that the proposed development does not give rise to noise nuisance to neighbouring residents in accordance with policy DM1 of the Harrow Development Management Policies Local Plan (2013)

40. Permitted Development Rights

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that order with or without modification), no development which would otherwise fall within Class O in Part 3 of Schedule 2 to that Order shall be carried out without the prior written permission of the local planning authority.

REASON: To safeguard the business use of the proposed development and vitality of the area in accordance with London Plan Policy 2013 and Local Plan Policies CS1 and AAP3.

41. Community Use

Prior to the commencement of superstructure of the building hereby permitted, including any works of demolition, an alternative premises for an acceptable replacement D1 (h) community use shall be secured.

REASON: To ensure there is no loss of community facilities and to ensure the development would accord with local plan policies CS1 Z, DM 46 and DM 47.

Conditions relating to the 'Outline' element

1. Timing

Applications for approval of the Reserved Matters for the development hereby approved shall be made to the local planning authority before the expiration of 3 years from the date of this planning permission.

The development hereby approved shall be begun no later than 2 years from the approval of the last Reserved Matter.

REASON: To comply with the provisions of section 92 of the Town and Country Planning Act 1990.

2. All Matters Reserved

Approval of the details shown below (the Reserved Matters) shall be obtained from the local planning authority in writing before any development is commenced:

- (a) The layout of the site incorporating:
 - The siting of all buildings and ancillary structures
 - The means of access to and from the site
 - The extent and position of accommodation or parking of cars within the site and/or building.
 - The extent and position of accommodation for loading and unloading of vehicles within the site or building
 - The layout and surface treatment of all service roads, drives parking and turning areas
 - The internal layout of the accommodation on each floor, including the size and purposes of the rooms and the position of the fitting and facilities in each room.
 - The facilities to be provided for the storage and removal of waste
- (b) The scale
 - Details of the maximum number of patrons using the facility
- (c) The appearance of the building including:
 - Full plans and elevations of the building and other structures showing the design and external appearance of the building and including all details of materials to be used for external surfaces.
- (d) Access
 - The provisions to be made within the development to ensure that people with disabilities are able to gain full access to and make adequate use of the accommodation to be provided.
- (e) landscaping
 - The means of enclosure on all site boundaries, indicating clearly which are existing and which are proposed and including full details of height, materials and construction

The development shall not be carried out otherwise than in accordance with the reserved matters thus approved.

REASON: In order to comply with the provisions of Section 92 of the Town and Country

Planning Act 1990 (as amended).

3. Approved Plan and Documents

Unless otherwise agreed in writing by the local planning authority, the development shall be carried out in accordance with the approved Parameter Plan (HNC-A-07-001 Rev P2) and documents.

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

PRE-COMMECEMENT (INCLUDING DEMOLITION)

4. Demolition and Construction Logistics Plan

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

- a) The parking of vehicles of site operatives and visitors;
- b) Loading and unloading of plant and materials;
- c) Storage of plant and materials used in construction the development;
- d) The erection and maintenance of security hoardings including decorative displays and facilities for public viewing;
- e) Wheel washing facilities;
- f) A scheme for recycling/disposing of waste resulting from demolition and construction works;
- g) Measures for the control and reduction of dust;
- h) Measures for the control and reduction of noise and vibration; and
- i) Measures to ensure that pedestrian access to the residential flats on the upper floors of No. 34 the High Street is maintained at all times.

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

REASON: To ensure that measures are put in place to manage and reduce noise and vibration impacts during demolition and construction and to safeguard the amenity of neighbouring occupiers, in accordance with Local Plan Policies DM1 and DM43 and Policies 7.14 and 7.15 of the London Plan (2016) and to ensure that the transport network impact of demolition and construction work associated with the development is managed in accordance with Policy 6.3 of the London Plan (2016), this condition is a PRE-COMMENCEMENT condition.

5. Construction and Site Waste Management Plan

No development shall take place, including any works of demolition, until a construction and site waste management plan, setting out arrangements for the handling of excavation, demolition and construction waste arising from the development, and to make provision for the recovery and re-use of salvaged materials wherever possible, has been submitted to and approved in writing by the local planning authority.

The development shall be carried out in accordance with the approved plan or any

amendment or variation to it as may be agreed in writing by the local planning authority.

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

6. Non-Road Mobile Machinery

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

REASON: To ensure that the development would not result in a deterioration of air quality in accordance with, Local Plan Policies AAP 4 and DM1 and Policy 7.14 of the London Plan (2016) to ensure that suitable vehicles would be used during the construction process, this is a PRE-COMMENCEMENT CONDITION.

7. Levels

Notwithstanding the details shown on the drawings, no site works or development shall commence (other than demolition works) until details of the levels of the building(s), road(s) and footpath(s) in relation to the adjoining land and highway(s), and any other changes proposed in the level of the site, have been submitted to, and agreed in writing by the local planning authority. The development shall be carried out in accordance with the details so agreed.

REASON: To ensure that the works are carried out at suitable levels in relation to the highway and adjoining properties in the interests of the amenity of neighbouring residents, the appearance of the development, drainage, gradient of access and future highway improvement in accordance with Policies AAP 1, AAP 4, AAP 9, and AAP19 of the Harrow and Wealdstone Area Action Plan (2013) and policies DM 1 and DM 42 of the Harrow Development Management Policies Local Plan (2013). To ensure that appropriate site levels are agreed before the superstructure commences on site, this condition is a PRE-COMMENCEMENT condition.

ACCOMPANYING RESERVED MATTERS APPLICATIONS

8. Car Parking

Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout, scale, appearance, access and landscaping shall make provision for two car parking spaces for disabled members of staff and/or visitors and cycle parking that accord with Tables 6.2 and 6.3 of the London Plan (2016).

REASON: To ensure satisfactory parking arrangements in accordance with Local Plan Policies AAP19 and DM42 and Policy 6.13 of the London Plan (2016).

9. Travel Plan

Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout and access shall be accompanied by a Travel Plan that sets out up-to-date travel surveys of the existing ashram temple at No. 22 Palmerston Road and measures to encourage greater use of sustainable transport modes, particularly cycling and walking and principles for managing the use of the two car parking spaces hereby approved.

The building shall be operated only in accordance with a Travel Plan that has been submitted to and approved in writing by the local planning authority.

REASON: To encourage shifts to more sustainable modes of travel in accordance with Local Plan Policy DM43 and Policies 6.11 and 6.14 of the London Plan (2016).

10. Energy Statement

Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout and scale shall be accompanied by an Energy Statement. This will set out how energy use and carbon dioxide emissions are to be reduced in accordance with the London Plan energy hierarchy. It will include consideration of the following:

- a. Connecting with a future District Heat Network
- b. Incorporating a stand-alone Combined Heat and Power system;
- c. Incorporating onsite renewable energy technology

The building shall be constructed and operated only in accordance with an Energy Statement that has been submitted to and approved in writing by the local planning authority.

REASON: To ensure that the building is designed to meet the highest possible environmental standards in accordance with Local Plan Policy DM14 and Policies 5.2, 5.6, 5.7 and 5.9 of the London Plan (2016).

11. Drainage

Applications for approval of Reserved Matters submitted pursuant to this permission relating to layout and scale shall be accompanied by a surface water and foul water drainage strategy to be agreed in writing by the Local Planning Authority. This shall include details of works for the disposal of surface water, including surface water attenuation and storage works and measures to prevent water pollution and details of SuDS and their management and maintenance.

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

REASON: To ensure that the development achieves an appropriate greenfield run-off rate in this critical drainage area and to ensure that sustainable urban drainage measures are exploited, in accordance with London Policies 5.13 & 5.15 of the London Plan (2015) and Policy AAP 9 of the Local Plan (2013).

COMPLIANCE

12. Flood Risk

The development shall be undertaken in accordance with the approved Flood Risk Assessment and Surface Water Drainage Strategy Ref: 40451/2001 Rev 3, dated December 2017. This shall include that the ancillary residential accommodation hereby approved shall be located at a height of 53.0m AOD and above and that access to the building is located to the north of the building in flood zone 1.

Reason: To ensure the safety those sleeping in the building in accordance with Local Plan Policies CP3, AAAP9, DM9 and DM10 and Policies 5.12 and 5.13 of the London Plan (2016).

13. Unexpected Contamination

In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken and where remediation is necessary a remediation scheme must be prepared which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority.

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 receptors in accordance with Policy 5.21 of the London Plan 2015 and Policy DM 15 of the Harrow Development.

14. Opening Hours

The place of worship hereby permitted shall not be open outside the hours of 06:30 TO 23:00 Monday to Friday and Sunday (including public holidays) and 10:00 to 24:00 on Friday and Saturday.

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).

Plan List: To Follow

Informatives

1. Policies

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

2016 London Plan (consolidated with Alterations since 2011) (March 2016)

Policy 1.1: Delivering the strategic vision and objectives for London

Policy 2.13: Opportunity Areas and Intensification Areas

Policy 2.15: Town centres

Policy 2.16: Strategic outer London development centres

Policy 3.1: Ensuring equal life chances for all

Policy 3.2: Improving health and addressing health inequalities

Policy 3.16: Protection and enhancement of social infrastructure

Policy 4.1: Developing London's economy

Policy 4.2: Offices

Policy 4.7: Retail and town centre development

Policy 4.8: Supporting a successful and diverse retail sector

Policy 4.9: Small shops

Policy 4.12: Improving opportunities for all

Policy 5.1: Climate change mitigation

Policy 5.2: Minimising carbon dioxide emissions

Policy 5.3: Sustainable design and construction

Policy 5.5: Decentralised energy networks

Policy 5.6: Decentralised energy in development proposals

Policy 5.7: Renewable energy

Policy 5.8: Innovative energy technologies

Policy 5.9: Overheating and cooling

Policy 5.10: Urban greening

Policy 5.11: Green roofs and development site environs

Policy 5.12: Flood risk management

Policy 5.13: Sustainable drainage

Policy 5.14: Water quality and wastewater Infrastructure

Policy 5.15: Water use and supplies

Policy 5.16: Waste self-sufficiency

Policy 5.17: Waste capacity

Policy 5.18: Construction, excavation and demolition waste

Policy 5.20: Aggregates

Policy 5.21: Contaminated land

Policy 6.1: Strategic approach

Policy 6.2: Providing public transport capacity and safeguarding land for transport

Policy 6.3: Assessing effects of development on transport capacity

Policy 6.7: Better streets and surface transport

Policy 6.9: Cycling

Policy 6.10: Walking

Policy 6.11: Smoothing traffic flow and tackling congestion
Policy 6.12: Road network capacity
Policy 6.13: Parking
Policy 7.1: Building London's neighbourhoods and communities
Policy 7.2: An inclusive environment
Policy 7.3: Designing out crime
Policy 7.4: Local character
Policy 7.5: Public realm
Policy 7.6: Architecture
Policy 7.7: Location and design of tall and large buildings
Policy 7.8: Heritage assets and archaeology
Policy 7.14: Improving air quality
Policy 7.15: Reducing noise and enhancing soundscapes
Policy 7.18: Protecting local open space and addressing local deficiency
Policy 7.19: Biodiversity and access to nature
Policy 7.30: London's canals and other rivers and water spaces
Policy 8.1: Implementation
Policy 8.2: Planning obligations
Policy 8.3: Community infrastructure levy
Policy 8.4: Monitoring and review for London

Draft London Plan December 2017:

Policy SD1 Opportunity Areas
Policy SD6 Town centres
Policy SD7 Town centre network
Policy SD8 Town centres: development principles and Development
Plan Documents
Policy SD10 Strategic and local regeneration
Policy D1 London's form and characteristics
Policy D2 Delivering good design
Policy D3 Inclusive design
Policy D7 Public realm
Policy D8 Tall buildings
Policy S1 Developing London's social infrastructure
Policy S2 Health and social care facilities
Policy HC1 Heritage conservation and growth
Policy G1 Green infrastructure
Policy G5 Urban greening
Policy G6 Biodiversity and access to nature
Policy G7 Trees and woodlands
Policy SI1 Improving air quality
Policy SI2 Minimising greenhouse gas emissions
Policy SI3 Energy infrastructure
Policy SI4 Managing heat risk
Policy SI5 Water infrastructure
Policy SI7 Reducing waste and supporting the circular economy
Policy SI12 Flood risk management
Policy SI13 Sustainable drainage
Policy T1 Strategic approach to transport
Policy T2 Healthy Streets

Policy T3 Transport capacity, connectivity and safeguarding
Policy T4 Assessing and mitigating transport impacts
Policy T5 Cycling
Policy T6 Car parking
Policy T6.2 Office parking

Harrow Core Strategy (February 2012)

Core Policy CS1: Overarching Principles
Core Policy CS2: Harrow and Wealdstone (including the Intensification Area)

Harrow and Wealdstone Area Action Plan (July 2013)

Policy AAP1: Development within Harrow town centre
Policy AAP2: Station Road
Policy AAP3: Wealdstone
Policy AAP4: Achieving a High Standard of Development throughout the Heart of Harrow
Policy AAP5: Density and Use of Development
Policy AAP6: Development Height
Policy AAP7: Creating a New Public Realm
Policy AAP8: Enhancing the Setting of Harrow Hill
Policy AAP9: Flood Risk and Sustainable Drainage
Policy AAP10: Harrow & Wealdstone District Energy Network
Policy AAP11: Provision of Open Space
Policy AAP12: Improving Access to Nature
Policy AAP14: The Consolidation of the Wealdstone Strategic Industrial Location
Policy AAP17: Primary Shopping Areas and the Primary Shopping Frontage
Policy AAP18: Secondary Frontages, Neighbourhood Parades, and Non-Designated Retail Parades
Policy AAP19: Transport, Parking and Access within the Heart of Harrow
Policy AAP 20: Harrow & Wealdstone Green Travel Plan
Policy AAP 21: Harrow Waste Management Site
Policy AAP 22: Supporting Site Assembly within the Heart of Harrow

Harrow Development Management Policies (July 2013)

Policy DM 1 Achieving a High Standard of Development
Policy DM 2 Achieving Lifetime Neighbourhoods
Policy DM 3 Protected Views and Vistas
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 Decentralised Energy Systems
Policy DM 14 Renewable Energy Technology
Policy DM 15 Prevention and Remediation of Contaminated Land
Policy DM 19 Provision of New Open Space
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 23 Street side Greenness and Forecourt Greenery

Policy DM 31 Supporting Economic Activity and Development
Policy DM 32 Office Development
Policy DM 35 New Town Centre Development
Policy DM 36 Primary Shopping Frontages
Policy DM 37 Secondary and Designated Shopping Frontages
Policy DM 38 Other Town Centre Frontages and Neighbourhood Parades
Policy DM 40 Mixed-Use Development in Town Centres
Policy DM 41 Evening Economy
Policy DM 42 Parking Standards
Policy DM 43 Transport Assessments and Travel Plans
Policy DM 44 Servicing
Policy DM 45 Waste Management
Policy DM 46 New Community, Sport and Education Facilities
Policy DM 47 Retention of Existing Community, Sport and Education Facilities
Policy DM 50 Planning Obligations

Other Guidance

Mayor of London Guidance

- Social Infrastructure (May 2015)
- Accessible London: Achieving an Inclusive Environment (October 2014)
- Town centres (July 2014)
- The control of dust and emissions during construction and demolition (July 2014)
- Character and Context (June 2014)
- Sustainable Design and Construction (April 2014)
- London View Management Framework SPG
- Shaping Neighbourhoods: Play and Informal Recreation (September 2012)
- Land for Industry and Transport (September 2012)
- All London Green Grid (March 2012)
- Planning for Equality and Diversity in London (October 2007)

LB Harrow Guidance

- Council's Code of Practice for the Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (February 2016)
- Planning Obligations & Affordable Housing SPD (October 2013)
- Access for All SPD (April 2006)

2. INFORMATIVE: MAYORAL CIL

Please be advised that approval of this application (either by Harrow Council, or subsequently by PINS if allowed on Appeal following a Refusal by Harrow Council) will attract a liability payment of **£636, 475** 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 **£636, 475** for the application, based on the levy rate for Harrow of £35/sqm and the stated increase in floorspace of 13, 000 sqm (C2 use) and 5185 (C3 Use)

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

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

3. INFORMATIVE: DISCHARGING TO PUBLIC SEWER

A Groundwater Risk Management Permit from Thames Water will be required for discharging ground water to the public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 0203 577 9483 or by emailing wwqriskmanagement@thameswater.co.uk Application forms should be completed online via www.thameswater.co.uk/wastewaterquality"

4. INFORMATIVE: FLOOD RISK ACTIVITY PERMIT INFORMATIVE:

Under the terms of the Environmental Permitting Regulations a Flood Risk Activity Permit is required from the Environment Agency for any proposed works or structures in, under, over or within 8 metres of the top of the bank of the Wealdstone Brook designated as a 'main river.'

Details of lower risk activities that may be excluded or exempt from the Permitting Regulations can be found on the gov.uk website. For further information please contact us at PSO-Thames@environment-agency.gov.uk

5. INFORMATIVE: CONSIDERATE CONTRACTOR CODE OF PRACTICE

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

6. INFORMATIVE: THE PARTY WALL ACT

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

1. work on an existing wall shared with another property;
2. building on the boundary with a neighbouring property;
3. excavating near a neighbouring building, and that work falls within the scope of the Act. Procedures under this Act are quite separate from the need for planning permission or building regulations approval. "The

Party Wall etc. Act 1996: Explanatory booklet" is available free of charge from: Communities and Local Government Publications, PO Box 236, Wetherby, LS23 7NB. Please quote Product code: 02 BR 00862 when ordering. Also available for download from the CLG website:

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/133214.pdf> Tel: 0870 1226 236, Fax: 0870 1226 237, Textphone: 0870 1207 405, E-mail:

7. INFORMATIVE: IMPORTANT: COMPLIANCE WITH PLANNING CONDITIONS

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

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

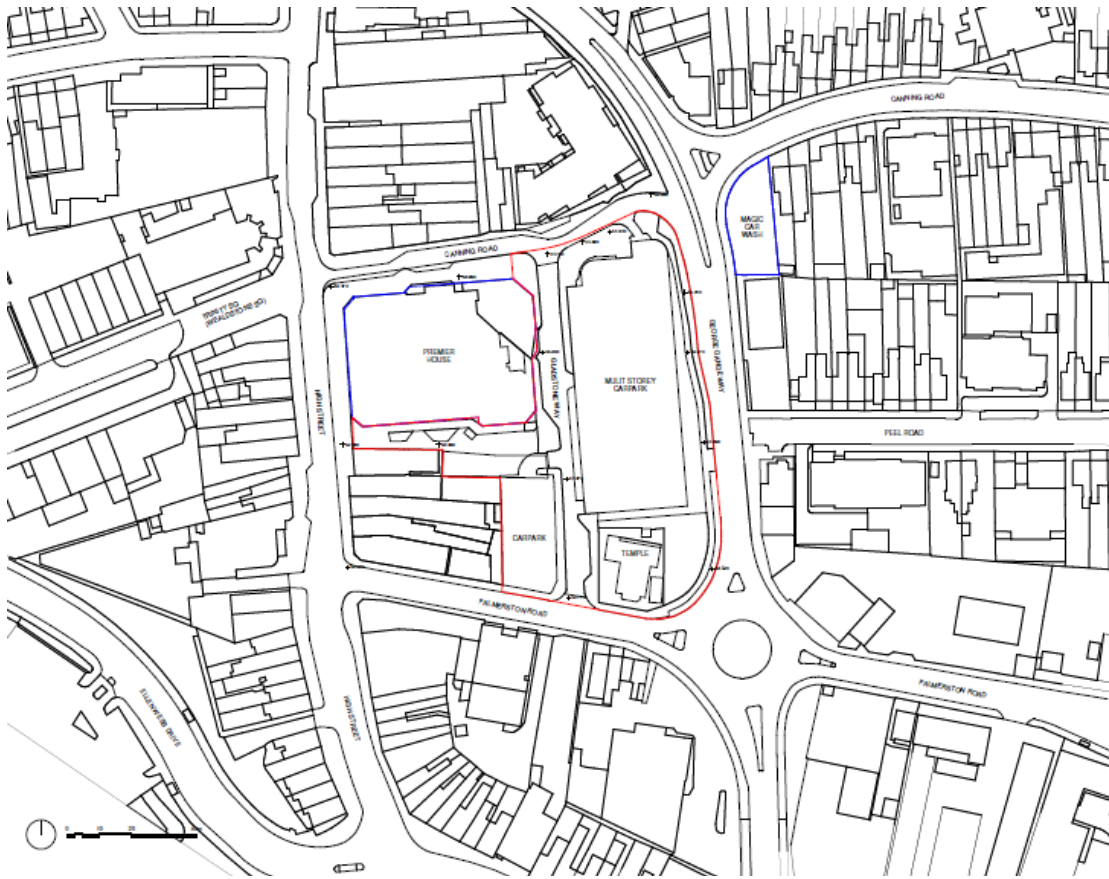
Beginning development in breach of a planning condition will invalidate your planning permission. If you require confirmation as to whether the works you have carried out are acceptable, then you should apply to the Local Planning Authority for a certificate of lawfulness.

8. INFORMATIVE: PRE APPLICATION ADVICE

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

APPENDIX 2: SITE PLAN



APPENDIX 3: SITE PLAN



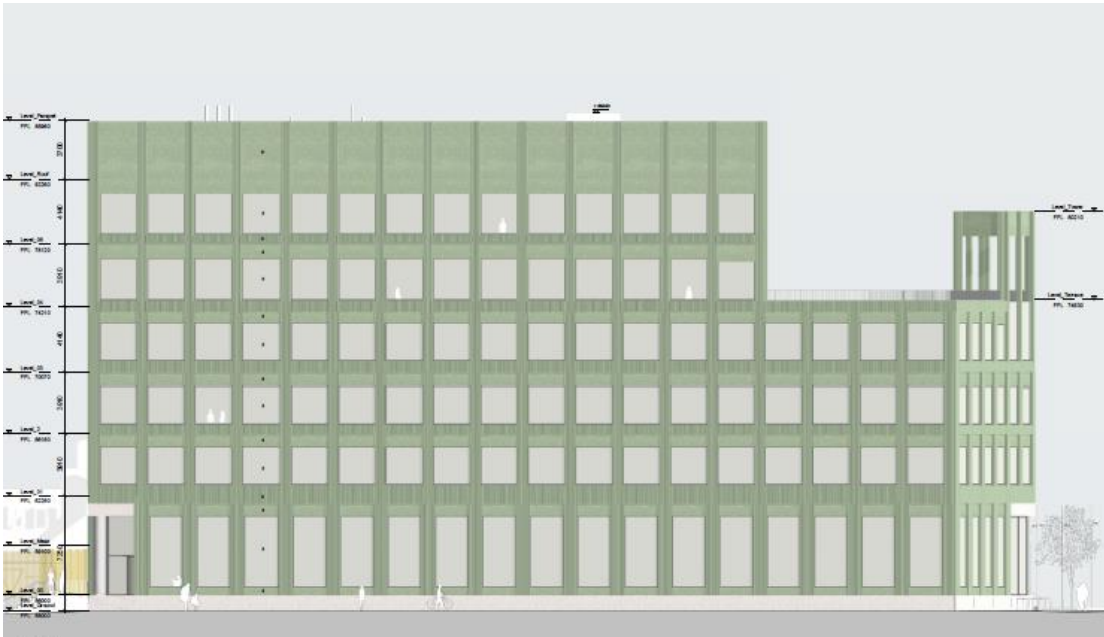
APPENDIX 4: PLANS AND ELEVATIONS



West Elevation



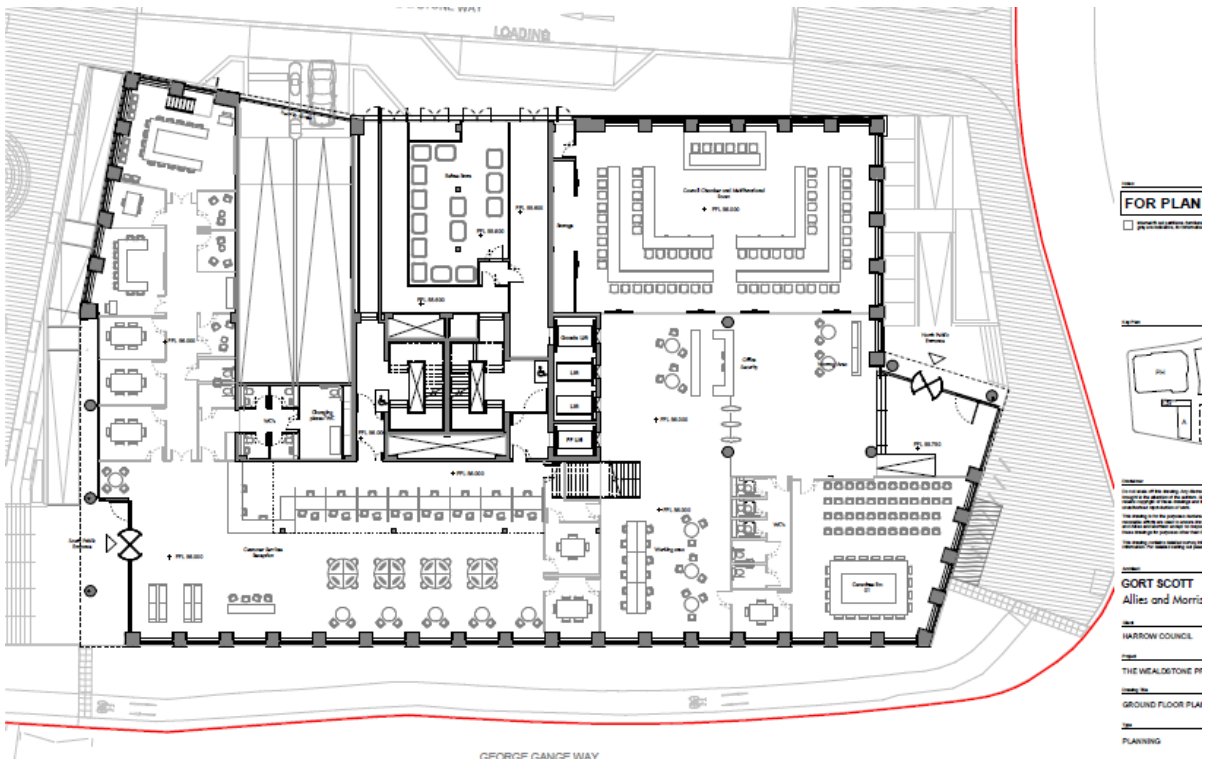
South Elevation



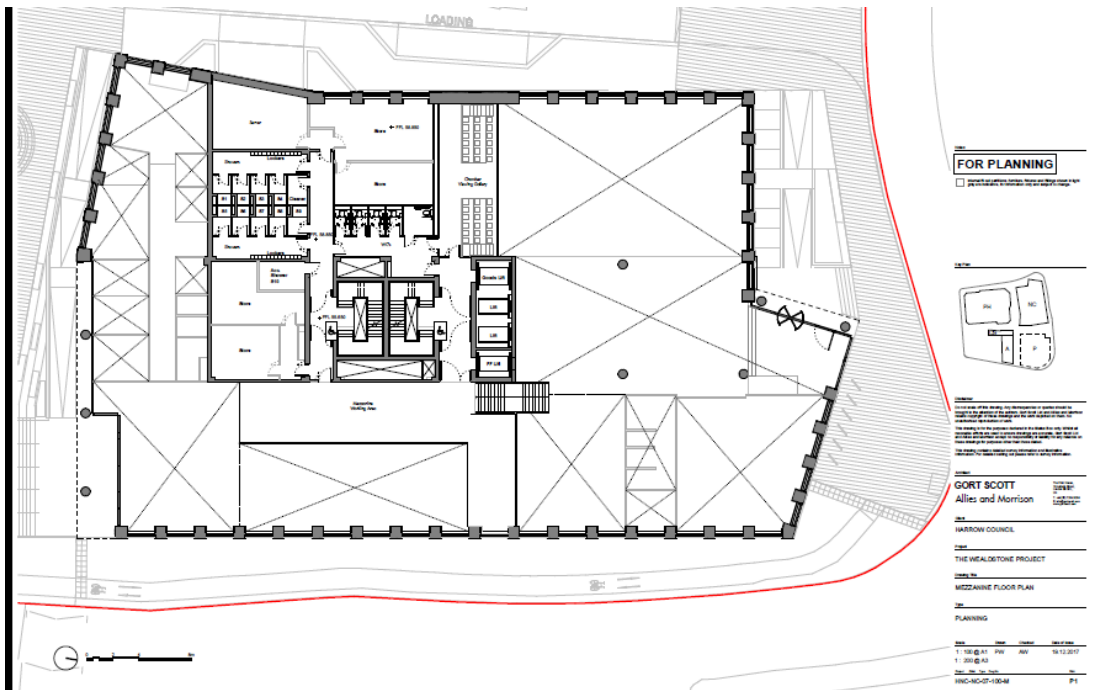
East Elevation



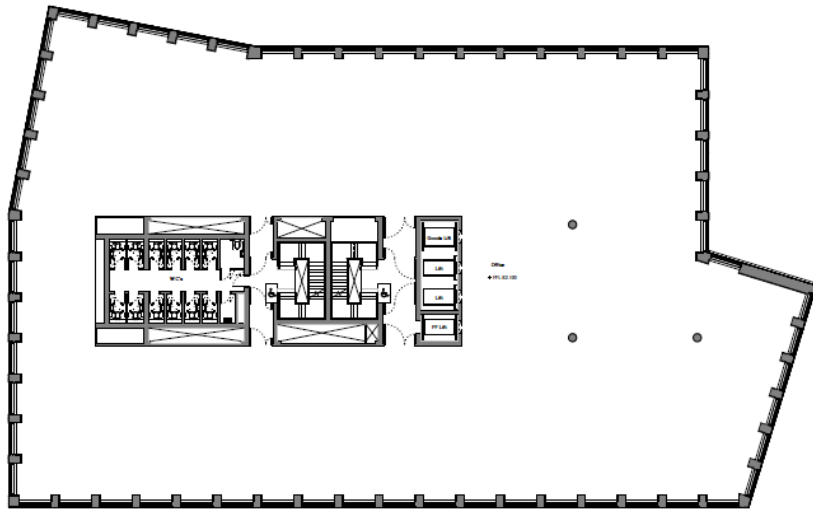
North Elevation



Ground Floor Plan



Mezzanine Floor plan



FOR PLANNING



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HARROW COUNCIL
 THE WEALSTONE PROJECT
 LEVEL 01 PLAN
 PLANNING

Scale: 1:200 @ A1, 1:200 @ A3
 Date: 08.12.2017
 Ref: HING-NC-01-101

Level One Floor Plan

APPENDIX 5 - Travel Plan Officer Full Comments

P/5737/17 – New Civic Centre Travel Plan

Please find below details of changes required to the proposed travel plan for the New Civic Centre.

Please resubmit the travel plan for approval by the London Borough of Harrow.

REF	Page #	Current proposed Travel Plan	Changes required for approval of Travel Plan
1	Pg 16	3.5.2	Although PTAL scoring is 6a, the local transport orbital connections for bus are relatively poor and train connections run in and out of London only. This suggests the site is not as accessible as the scoring suggests and should be reflected in the Travel Plan. Please update the Travel Plan to reflect this.
2	Pg 17	3..6.5	Further analysis of survey data is required in order to gain a better understanding of the travel needs of staff. For example, of the 25% that live within a 30 minute walk, how many use vehicles for business purposes during the day.

			<p>Please include a full summary of the 2017 survey and provide further analysis of data.</p> <p>Total response rates to the survey are not discussed other than in the table of results and seem high.</p> <p>Please provide an analysis of postcode data in a reader friendly format and include in the Travel Plan. The data should also be used to inform and amend, where necessary, the rest of the Travel Plan,</p>
3	Pg 21	4.4.1	<p>Based on ref 1 and 2, further analysis of current staff journeys to work and during business hours is required in order to understand the needs of staff travel.</p> <p>Please update the Travel Plan to reflect this.</p>
4	Pg 22	4.4.2	<p>The reduction in car parking spaces is a significant amount, therefore what is the current demand for accessible parking?</p> <p>Please also refer to comments provided by Laura McIntosh.</p>
5	P.22	4.5.1 <p>“The Provision of 631 less car parking spaces for office use at TWP is appropriate because it has been established that a majority of those who currently drive to the offices do so due to ease of parking”.</p>	<p>What is this based on? If this was covered in the staff survey, please provide response data to support this as there could be varying reasons why staff currently travel by car.</p>
6	P.24	5.3.2	<p>Has this been assessed against relevant survey data? It is uncertain that a shift of - 6% will be achieved, unless there is necessary data to support this. If a percentage of staff who take the bus have child care obligations, then they are unlikely to cycle to work. Has travel distance been taken in</p>

			to consideration? Please provide evidence of this and update the Travel Plan. Please include a target to reduce car usage.
7	P.25	6.2.3	Again, it would be helpful to have a summary of the survey conducted in 2017 to determine if there is support for this.
8	P.25	6.3.1	The OTPC should be in place at least 1 year prior to occupation and arrange a meeting with Travel Planners at Harrow Council once employed. Please update the Travel plan to reflect this.
9	P.25	6.3.2	Staff should be provided with travel information prior to occupation of the Civic Centre. This is to ensure a smooth transition and enable staff to make decisions about their travel options. Please update the Travel Plan to reflect this.
10	p.26	6.7	More Information is required on how this will be achieved, including a commitment to provide equipment for staff working from home.
11	P.26	6.7.2	Again please review this section in against ref 1 and 2 and amend, if necessary.
12	P.27	7	Action plan: <ul style="list-style-type: none"> • OTPC should be in place one year prior to occupation • Action plan items need to be in place prior to occupation to encourage the desired modal shift • Pool cars should be in place prior to occupation and staff made aware of arrangements for booking and general use of cars
13	p.29	Table 8.1	Staff should be updated on travel developments when changes occur and not annually.

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