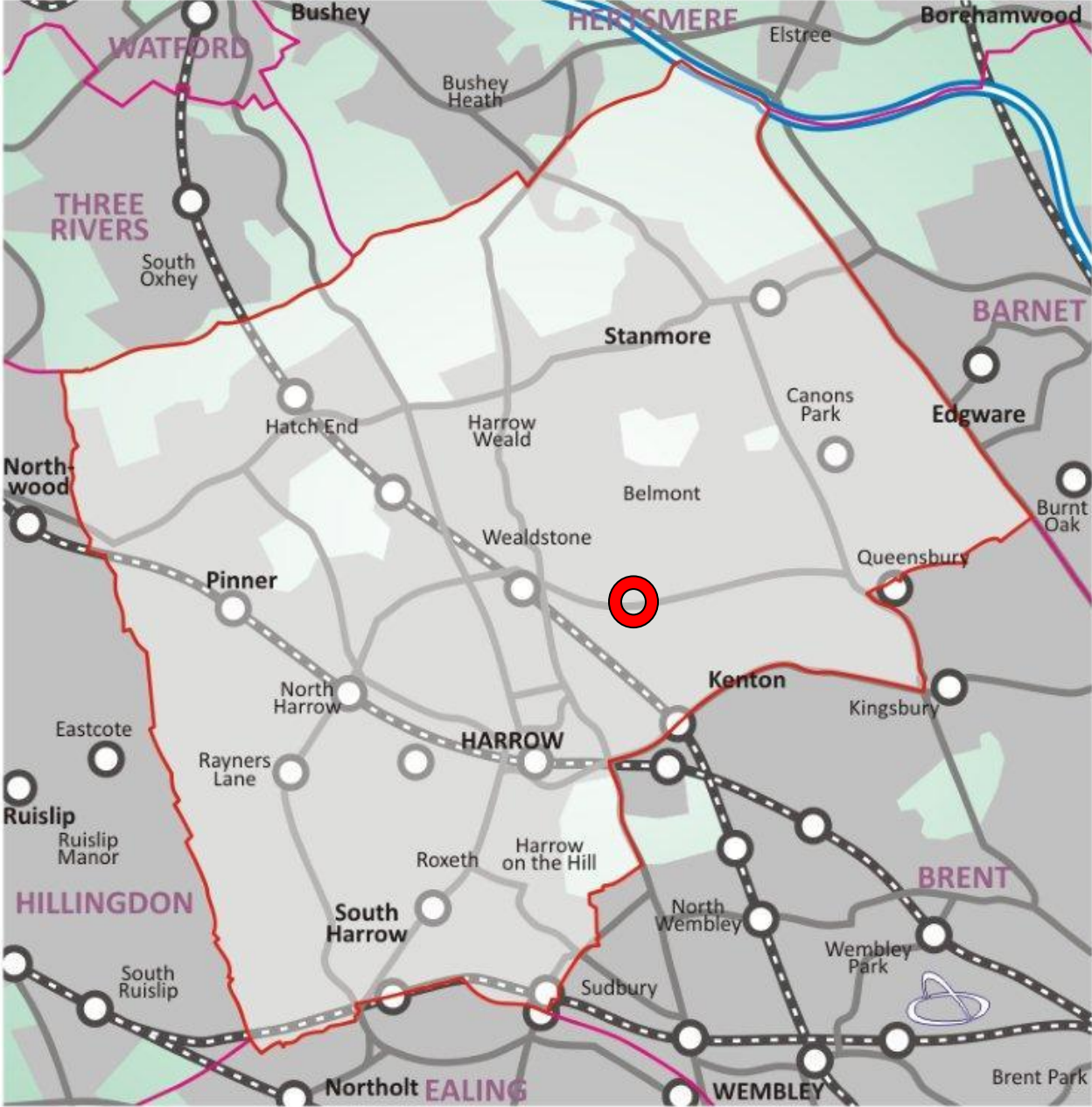
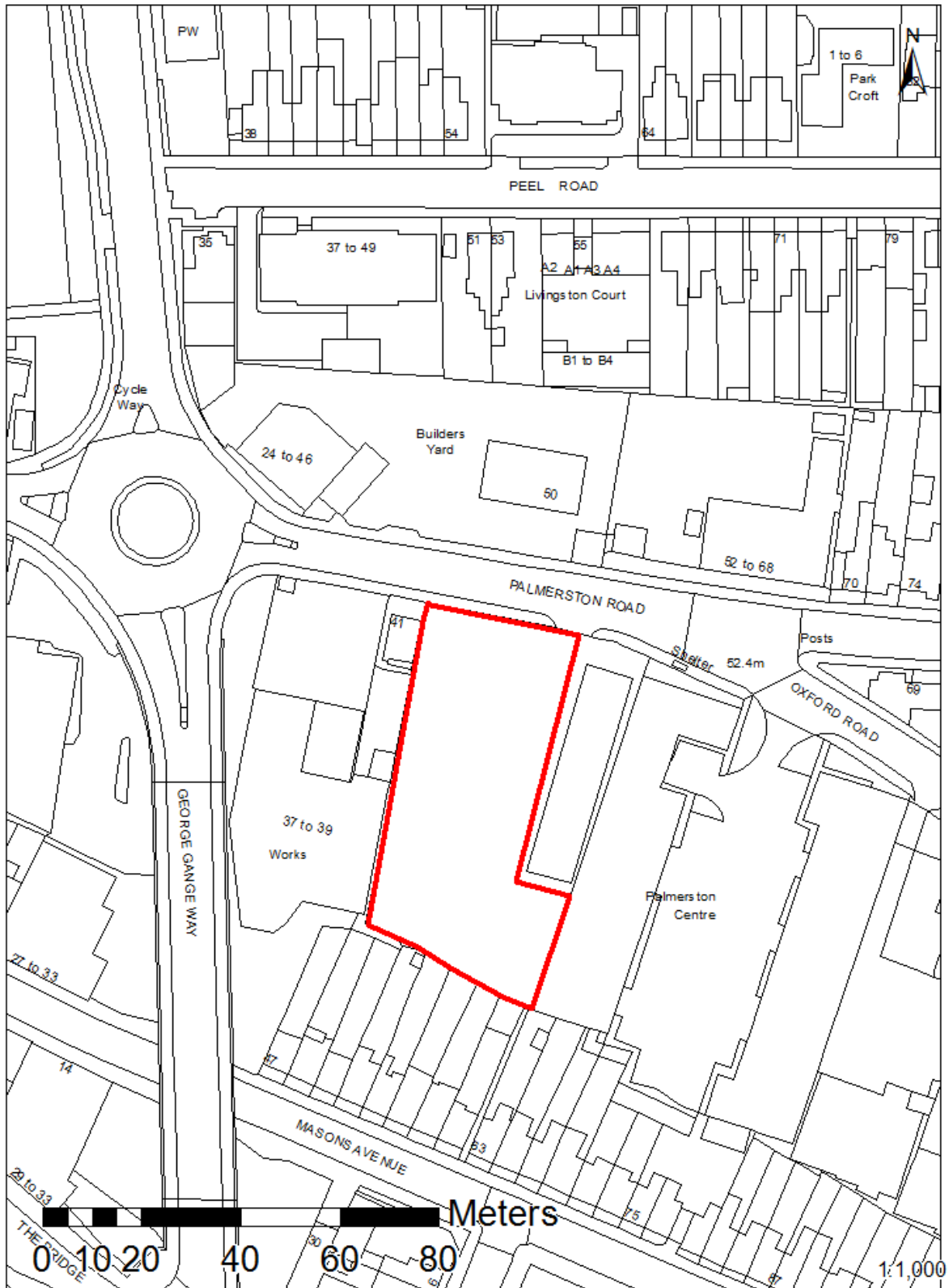


 = application site



55-59 Palmerston Road	P2555/18
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55-59 Palmerston Road



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LONDON BOROUGH OF HARROW

PLANNING COMMITTEE

26th September 2018

Application Number: P/2555/18
Validate Date: 27TH JUNE 2018
Location: 55-59 PALMERSTON ROAD
Ward: MARLBOROUGH
Postcode: HA3 7RR
Applicant: THE COLLECTIVE HURLINGTON LIMITED
Agent: DP9
Case Officer: NABEEL KASMANI
Extended Expiry Date: 5TH OCTOBER 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.

Demolition of existing buildings and redevelopment of the site to provide a part 9, part 8 and part 5 storey building comprising of offices (Use class B1a/B1c), café/restaurant (Use class A3) and co-living accommodation consisting of 222 units (Sui Generis); parking; bin and cycle stores; sub station

RECOMMENDATION A

The Planning Committee is asked to:

- 1) agree the reasons for approval as set out in this report, and
- 2) grant planning permission subject to authority being delegated to the Interim Chief Planning Officer in consultation with the Director of Legal and Governance Services for the completion of the Section 106 legal agreement and other enabling legislation and issue of the planning permission and subject to minor amendments to the conditions (set out in Appendix 1 of this report) or the legal agreement. The Section 106 Agreement Heads of Terms would cover the following matters:

Tenure and Management Strategy

- A tenure and management strategy

Affordable Housing

- An early and late stage review mechanism

Employment and Training

- A contribution to fund local employment and training programmes;
- The use of local suppliers and apprentices during the construction of the development
- A training and recruitment plan
- An employment management plan

Design Review and Design Code

- The retention of the existing architect (or one of equivalent standard) until the development is completed; or, the submission of a Design Code for approval by the Council that details the quality of the development

Decentralised Energy Network

- Sufficient space and a safeguarded route to allow connection to any future district decentralised energy network

Transport and Highway

- Development to be resident/visitor permit restricted
- Travel plan and contribution of £10,000 for a travel plan bond and £5,000 for monitoring fee
- Safeguarding new pedestrian and cycle route

Enhancements to the Wealdstone Brook

- A contribution of £56,600 to compensate for the lost opportunity to de-culvert the Wealdstone Brook

Legal Costs, administration and monitoring

- S106 legal and administrative costs.

RECOMMENDATION B

That if the Section 106 Agreement is not completed by 21st December 2018, or as such extended period as may be agreed by the Interim Chief Planning Officer in consultation with the Chair of the Planning Committee, then it is recommended to delegate the decision to REFUSE planning permission to the Interim Chief Planning Officer on the grounds that:

The proposed development, in the absence of a Legal Agreement to provide appropriate improvements, benefits and monitoring that directly relate to the development, would fail to adequately mitigate the impact of the development on the wider area and provide for necessary social, environmental and physical infrastructural improvements arising directly from the development, contrary to the National Planning Policy Framework (2018), policies 3.11, 3.13, 5.6, 5.12, 6.3, 7.4, 7.5, 7.6 and 7.7 of The London Plan (2016), Core Strategy (2012) policy CS1, policies DM 1, DM 2, DM 9, DM 13, DM 42, DM 43 and DM 50 of the Harrow Development Management, Policies Local Plan, policies AAP3, AAP4, AAP9, AAP10, AAP13, AAP15, AAP19 and AAP20 of the Harrow and Wealdstone Area Action Plan (2013) and the Supplementary Planning Document: Planning Obligations (2013).

REASON FOR THE RECOMMENDATIONS

The proposed development would provide a residential-led mixed use development, including flexible office space and a café/restaurant. The proposal would make a more efficient use of a prominent and highly accessible, already developed site, in close proximity to Wealdstone town centre and Harrow and Wealdstone station. It would also contribute to delivering the objectives of the Harrow and Wealdstone Opportunity Area, by providing residential accommodation and higher employment densities supporting the regeneration agenda. The financial viability position has been independently verified and a review mechanism will be carried out and will secure off-site affordable housing contributions if viable.

The design of the proposal is of a high quality in respect to its response to the site and local context, in terms of height and massing; layout and ground floor uses; connections and permeability; architectural appearance and materials; and public realm. The development would optimise the potential of the site, whilst delivering a high quality public realm. Officers are satisfied that material considerations exist to justify a 'taller' building on the site. The residential quality would be high given the general compliance with The London Plan and local policy standards and the quality of accommodation and services provided would be secured through legal obligations.

The proposal would preserve the significance of heritage assets located in the vicinity of the application site and their settings as well as the composition of the local protected views in which the development lies. The proposed development would greatly improve the accessibility of the built form and associated public realm for residents and visitors alike, by delivering an environment that is walkable with accessible commercial and office spaces. A range of wheelchair accessible units would also be provided. This inclusive environment would contribute to the principles of 'lifetime neighbourhoods'.

Given the urban context of the site, the application would not unacceptably impact upon the amenity of neighbouring occupiers in terms of: privacy/outlook; daylight, sunlight, overshadowing; noise and disturbance.

The proposed development would be of a high standard of sustainable design and construction, minimising carbon dioxide emissions by promoting passive design, using low carbon energy and including renewable energy in accordance with the energy hierarchy. The development would satisfy the Sequential and Exception Tests for a development in an area of high flood risk and it has been satisfactorily demonstrated that the proposal would not increase flood risk and would deliver sustainable urban drainage benefits over the existing situation at the site and deliver urban greening. The proposed development would also mitigate its own environmental impact in terms of air quality, land contamination and waste.

The proposal for a high density residential scheme in a highly accessible location accords with the London Plan policy of encouraging such development in locations that give rise to a pattern of development that minimises the need to travel by car. The car-free proposal is acceptable subject to a permit free agreement and measures to encourage sustainable travel through a travel plan. The transport aspects of this proposal when considered with

the conditions and obligations are considered to be in accordance with strategic and local transport policies.

Appropriate, reasonable and necessary planning conditions and planning obligations are proposed to ensure that the development is acceptable in planning terms and the environmental impacts are adequately managed. Accordingly there are no, or insufficient, grounds to withhold planning consent on the basis of the policies considered and other material planning considerations. Officers conclude that the proposed development is worthy of support.

INFORMATION

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

Statutory Return Type:	Largescale Major Development
Council Interest:	None
GLA Community Infrastructure Levy (CIL) Contribution (provisional):	£314,297
Local CIL requirement (provisional):	£453,877

HUMAN RIGHTS ACT

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

EQUALITIES

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

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

S17 Crime & Disorder Act

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

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

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

LIST OF ENCLOSURES / APPENDICES:

Officer Report:

Part 1: Planning Application Fact Sheet

Part 2: Officer Assessment

Appendix 1 – Conditions and Informatives

Appendix 2 – Site Plan

Appendix 3 – Site Photographs

Appendix 4 – Plans and Elevations

OFFICER REPORT

PART 1: Planning Application Fact Sheet

The Site	
Address	55-59 Palmerston Road, HA3 7RR
Applicant	The Collective Hurlington Limited
Ward	Marlborough
Local Plan allocation	n/a
Conservation Area	n/a
Listed Building	n/a
Setting of Listed Building	n/a
Building of Local Interest	n/a
Tree Preservation Order	n/a
Flood Zone	EA flood zone 2 (medium probability of flooding) and flood zone 3 (high probability of flooding)
Employment Land	The site falls within a designated Industrial and Business Use Area

Housing		
Co-living accomodation type	14m ²	3 (1%)
	16m ²	148 (67%)
	16m ² with private balcony	13 (6%)
	19m ² bed	31 (14%)
	21m ²	4 (2%)
	24m ²	23 (10%)

Non-residential Uses		
Existing Use(s)	Existing Use / Operator	B1, B8
	Existing Use Class(es) sqm	1,830m ² (of which 605m ² is currently vacant)
Proposed Use(s)	Proposed Use / Operator	B1(a,c) / A3
	Proposed Use Class(es) sqm	370m ² flexible workspace 193m ² Cafe
Employment	Existing number of jobs	21 (approximately) of which 12 are full-time
	Proposed number of jobs	Potential for 65 full-time

Transportation		
Car parking	No. Existing Car Parking spaces	10

	No. Proposed Car Parking spaces	5 car parking spaces for persons with disability (development would be car-free)
Cycle Parking	No. Existing Cycle Parking spaces	n/a
	No. Proposed Cycle Parking spaces (residential use)	222 Long stay spaces 12 Short stay spaces
	Cycle Parking Ratio	1:1
	No. Proposed Cycle Parking spaces (commercial use)	2 Long Stay 2 Short Stay
Public Transport	PTAL Rating	5
	Closest Rail Station / Distance (m)	Harrow & Wealdstone (300m south-west)
	Bus Routes	H9, H10 opposite application site and 140, 182, 186, 258 and 340 approximately 280m southwest of the site
Parking Controls	Controlled Parking Zone?	Yes (Zone J)
	CPZ Hours	7am - 12 midnight Mon - Sun
	Other on-street controls	Double yellow lines and bus clearways
Refuse/Recycling Collection	Summary of proposed refuse/recycling strategy	Two refuse collection cores within the building and bulk waste storage area located to south of site

Sustainability / Energy	
Development complies with Part L 2013?	36.5% reduction over Part L1 2013

PART 2: Assessment

1.0 SITE DESCRIPTION

- 1.1 The application site consists of a broadly L- shaped parcel of land located on the southern side of Palmerston Road with an approximate area of 0.22 hectares. The site is located within the Harrow & Wealdstone Opportunity Area
- 1.2 The site is currently occupied by three buildings. No. 55 Palmerston Road is a vacant three storey building which fronts the highway. No.59b Palmerston Road consists of a one and a half storey rectangular shaped building which is sited along the western boundary and is currently in use as a workshop and offices for Concept Glazing Systems. No. 59c Palmerston Road is a two-storey building and is occupied by Raymech Ltd who manufacture ventilation systems. The ground floor is used as a workshop and the first floor is used as offices/storage.
- 1.3 The application site is bounded to the east by a shared vehicular entrance to the site. Beyond this is No.59 Palmerston Road which is a two-storey rectangular building which runs parallel to the application site. The building is currently occupied by City Dry Cleaning Company. The application site wraps around the rear of the adjoining property and adjoins the rear of units 5 and 6 of the Palmerston Centre.
- 1.4 The parcel of land adjoining the application site to the west is occupied by a detached dwellinghouse and workshop buildings which accommodate a tyre garage and motor vehicle repair businesses. The front of the site is a tarmacked car park and is partially utilised as a hand car wash. Planning permission has been granted, subject to the completion of a section 106 agreement, for the redevelopment of this site which forms part of the 'Origin Housing Scheme' under planning reference P/1619/16. Permission has been granted on the adjacent site for a mixed use block (building C) ranging from ten to fifteen storeys with residential and commercial uses fronting Palmerston Road and a smaller five storey block (building E) to the rear with seven residential units and a commercial/community use.
- 1.5 Adjoining the application site to the south are the rear gardens of the residential dwellinghouses of Nos. 49-91 Masons Avenue. Travis Perkins Builders Yard is located opposite the application site.
- 1.6 The application site is located within EA flood zone 2 (medium probability of flooding) and 3 (high probability of flooding). The culverted Wealdstone Brook is located in close proximity to the southern boundary of the application site.
- 1.7 The application site is located within a designated Industrial and Business Use Area and has a public transport accessibility (PTAL) rating of 5.

2.0 **PROPOSAL**

- 2.1 Full Planning permission is sought for the redevelopment of the application site to provide mixed use development between 5 and 9 storeys in height, comprising 222 co-living accommodation units (Sui generis), workspace/Artists studios (Class B1a/c) and a café/restaurant (Class A3).
- 2.2 The proposed building would have a rectangular form with a maximum depth of 54m and width of 22m. At ground floor level, the proposed building would be sited approximately 2.5m from the adjoining western boundary, between 4.5m-9m from the adjoining eastern boundary and between 12m-16m from the adjoining southern boundary. The proposed building would have a maximum height of 29.6m.
- 2.3 The proposed building would have a stepped design. From the first to fourth floors, the proposed west facing flank wall would be recessed from the proposed ground floor by 2-4.5m. The proposed rear elevation would oversail the proposed ground floor by approximately 2.5m. On the fifth floor, the proposed west facing elevation would be recessed in part by a further 2.2m and the proposed east facing elevation would be recessed by an additional 2.3m. The southern elevation would be set-in by a further 5.7m with the flat roof being utilised as a communal amenity space. A further courtyard space would be provided on this floor.
- 2.4 Owing to the elevated courtyard on the proposed fifth floor, the proposed building would have two distinct blocks from this floor upwards. A walkway on the 8th floor would bridge the two blocks. The southern elevation of the proposed 8th floor would be set-in by a further 6m to provide a terrace.
- 2.5 With regards to the proposed floorplan layouts, the basement would provide plant rooms, a linen store and residential storage. At ground floor level, the café/restaurant would front Palmerston Road. While the proposed reception would be accessible from the café, the main entrance would be located on the eastern elevation some 17m from the building frontage via a colonnade. The flexible B1a workspace would also be provided on the ground floor in conjunction with administrative spaces and integral refuse storage.
- 2.6 The proposed residential use would be located on floors one to nine. A shared laundry and gym would be provided on the first floor and a shared kitchen, library, screening room, events/games room and lounge would be located on the proposed ninth floor.
- 2.7 To offer variety to the co-living accommodation, a selection of room types are proposed with regards to floor area and layout. The proposed rooms would vary in size from 14m² to 24m². The majority of units (67%) would have a floor area of 16m². Each unit would benefit from a single bed, kitchenette, worktable, bathroom and fitted wardrobe and storage space.

- 2.8 The proposed building would have a brick finish with stone coping. The window frames would be anodised light bronze/gold colour and opaque horizontal spandrel pieces are also proposed to animate the elevations. The proposed eighth floor would feature distinctive circular windows and the ground floor would feature expressed double height glazing.
- 2.9 Three outbuildings are provided to the southern part of the site. The largest of these structures is the cycle and refuse storage located to the south-east corner of the site. It would have an area of 155m² and a flat roof profile. An additional cycle store is located adjacent to the south-western boundary. The proposed substation would be located to the rear of No.59 Palmerston Road with an approximate area of 34m². All the proposed structures would have a maximum height of 3.5m and would feature a trellis fixed to perforated metal cladding.
- 2.10 The public realm around the building is comparatively small but would be defined through distinctive, patterned ground treatments. Soft landscaping is proposed through a mixture of tree planting and green walls with a trellis system. Street furniture would be provided in the form of benches and tables.
- 2.11 The proposed ground level landscaping works have been designed to integrate with future links from the site through the neighbouring 'Origin Housing scheme'.
- 2.12 The proposed development would be 'car free'. Five car parking spaces for persons with disability would be provided for the accessible co-living units. A total of 238 cycle spaces would be provided and would be located within the two designated cycle stores at the southern part of the site.
- 2.13 There would be two integral refuse stores within the building on the ground floor and an external refuse store attached to the cycle store at the southern end of the site

3.0 RELEVANT PLANNING HISTORY

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

Ref no.	Description	Status and date of decision
<u>55 Palmerston Road</u>		
LBH/22083	Change of use of part of ground floor and basement from showrooms and storage to offices assistant	Grant: 16/09/1982
P/1709/11	Change of use of offices (class b1) to education facility	Grant: 03/10/2011

	(class d1) for a period of five years (retrospective application)	
<u>59 Palmerston Road</u>		
HAR/1242	Erection 3 storey office building	19/04/1949
HAR/1462/B	Erection Factory Laboratory on 2 Floors	08/04/1963
LBH/4365/4	Erection of 2 Storey Building for Use as Offices and Storage with Car Parking Underneath	18/05/1970
LBH/41252	Single Storey Store Building	21/08/1990

4.0 CONSULTATION

- 4.1 Site Notices were erected on 17th July 2018 expiring on 7th August 2018
- 4.2 A Press Notice was advertised in the Harrow Times on the 28th June 2018, expiring on 19th July.
- 4.3 The application was advertised as a major application
- 4.4 A total of 395 consultation letters were sent to neighbouring properties regarding this application.
- 4.5 The overall public consultation period expired on 20th July 2018.
- 4.6 Adjoining Properties

Number of letters Sent	395
Number of Responses Received	1
Number in Support	0
Number of Objections	1
Number of other Representations (neither objecting or supporting)	0

4.7 1 objection was received from an adjoining occupier

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

Summary of Comments	Officer Comments
Would the proposal affect operation of dry cleaning company; right of way and this is not clear on drawing; windows would result in overlooking and loss of privacy; existing drain system is in common; parking impacts	The application site is demarcated on the submitted plans and it is not envisaged that the proposal would have a detrimental impact on the functioning of the adjoining business; rights of way are a civil matter; the windows would face towards the adjoining building but given the distance to the boundary and use of the business, officers consider that this would not give rise to an unsatisfactory amenity relationship; drainage has been addressed in section 6.7 of the report; Parking has been addressed in section 6.6 of the report.

4.9 Statutory and Non Statutory Consultation

4.10 The following consultations have been undertaken.

LBH Highways
LBH Planning Policy
LBH Drainage
LBH Environmental Health
LBH Design
LBH Economic Development
LBH Conservation Officer
LBH Landscape Architect
LBH Biodiversity Officer
LBH Housing Enabling
LBH Waste Officer
LBH Travel Planner
TFL
Ministry of Defence
Environment Agency
Designing Out Crime Officer, Metropolitan Police Service
Thames Water Authority

4.11 External Consultation

4.12 A summary of the consultation responses received are set out below.

LBH Highways

This proposal is within a PTAL 5 location; it is within close walking distance of Harrow & Wealdstone Station offering links to central London and beyond. Wealdstone High Street is also a short distance away where there is access to numerous bus services and many local amenities.

Due to the good public transport access, it is considered that this location is suitable for accommodating low car or car-free developments. This particular proposal seeks to be car free, only providing 5 parking bays for residents with disabilities. There are stringent parking controls in the vicinity of the proposal site therefore, it is considered that despite the minimal car trip generation predicted, there are unlikely to be many car trips associated with this development at all as there are few on-street parking opportunities nearby. It is however, considered unrealistic to expect that there would be zero demand for car journeys, therefore, it would be beneficial if the site provided residents with access to a car club which could be accommodated within the site. It is acknowledged that there is a proposal for a car club bay associated with the proposed development adjacent this site, however this has not actually come forward for implementation and I am not aware of the current progression with the Section 106 agreement.

The level of cycle parking, disabled parking and electric vehicle charge points is acceptable. Subject to this development being parking permit restricted via legal agreement, we would consider the residual highways impact to be minimal and therefore have no objection.

The TfL response is broadly supported however the suggestion for improvements to walking and cycling in the form of wayfinding signs and cycle facilities on George Gange Way may not be necessary. We already have proposals for improvements to the cycling infrastructure on George Gange Way and wayfinding signs were included as part of the proposals for the Deller site next door – should the scheme come forward, further signs would not be required.

LBH Planning Policy (summary)

Harrow does not have any such developments within the Borough, but note that this product is supported within the draft London Plan (2017) through policy H18. Furthermore it may lead to mixed and balanced communities, and towards meeting housing targets within the Borough. In the absence of any current adopted policies or guidance in relation to this typology, and the direction of travel that the draft London Plan (2017) the LPA requires compliance with policy H18. Policy H18 of the draft London Plan (2017) is relatively prescriptive in how such a development ought to be arranged, however, does not provide minimum space standards in relation to private or communal areas of a development. The

proposal, along with proposing commercial floor space, also provides a valuable contribution to the Housing targets (3:1). Notwithstanding the remainder of the appraisal, this typology would meet an identified need, and given its location with the Harrow Opportunity Area and a very high PTAL, would be ideally located.

Further to the loss of the existing floor space (from approximately 1800sqm to 619sqm), in determining the acceptability of this, consideration of the offer of replacement floor space / employment yield must also be undertaken. The proposal in this case would propose the majority of the ground floor to be set aside as employment floorspace. Specifically, the development would provide 412sqm of modern employment floor space as co-working (flexible) space. This provides a flexible offer where a number of users and uses can be incorporated into this element, specifically favouring small start-up business. Furthermore, the employment space would provide 195sqm of café / restaurant (Use Class A3). The proposed employment floor space is then anticipated to provide an approximate employment yield of 60 – 65 employees for the site. This is substantially higher than the employment yield of the site currently, which is approximately 21 employees across the site.

It is noted that the applicant states the maximum reasonable contribution (Cash in Lieu) for Affordable Housing is zero. Whilst this will be tested, it is recommended that a review clause be added to any grant of planning permission. The sequential and exception tests are acceptable. Subject to the above, Planning Policy would not have an objection to the above proposal.

LBH Drainage

I can confirm that the FRA with the drainage strategy proposed is satisfactory. Further drainage design details are still required so conditions/informative should be applied:

LBH Environmental Health

No objection subject to conditions

LBH Design (summary)

This is a high quality scheme that will make a positive contribution to Wealdstone and help to raise the standard of architecture in the area. The scheme was presented at two Design Review Panel sessions in January 2018 and April 2018, and was well received by the Panel who judged it to be an interesting and well-designed proposal. The Panel made a number of suggestions, and the design team have subsequently addressed all of the major points in this application. At the DRP's suggestion, the applicant has used this project as an opportunity to explore different residential models (e.g. rooms for downsizers etc). This approach is welcomed, although it still remains to be seen how future proof this form of residential development is, and a greater degree of flexibility would have been beneficial

LBH Economic Development

Economic Development is concerned that the loss of this space to mostly residential development will have a knock on effect on these neighbouring industrial uses both by setting a precedent for mixed use development and in restricting future uses of the industrial areas given the new residential use in the area.

With the loss of office and other employment uses across the borough to residential uses, Economic Development consider that this site is ideally located for industrial and employment uses and so its redevelopment for part residential uses is not acceptable. However, we recognise that this approach would limit the development potential of the site. If the proposal is acceptable from the Planning Policy viewpoint, we would require that employment use is included within the proposals. Given the low cost of industrial and office accommodation in the area, the Council supports the development of employment space for creative businesses in Wealdstone. It has already supported the development of Whitefriars Studios and has submitted a bid to the GLA for funding to support a Wealdstone Creative Enterprise Zone. A section 106 agreement should secure the employment space and construction training.

LBH Conservation Officer

The proposal would preserve the setting of the heritage assets

LBH Landscape Architect

The paved areas should be simplified. High quality natural stone paving would be a requirement for the development. Any hard surface proposals adjacent to the road, such as the public footway, would require agreement with the Highways Department, the proposed materials would need to be easily maintained and available, or alternatively a quantity of replacement hard landscape materials could perhaps be stored offsite, at a cost to the developer. The proposed footway hard surfacing material would also need to link and be the same material as adjacent footway surfacing.

There is a proposed living extensive green roof and in order to provide ecological enhancements a more species rich living roof should be created, by planting wildflowers and native grasses rather than native Sedum species, as noted in the Ecological report, (J Taylor Ecology Consulting), Clause 7.4.7. This would not only provide the benefits of thermal and acoustic insulation and protection of the roof surfaces but also aesthetic and ecological benefits. A landscape condition for the green roofs should ensure that the ecological enhancements are developed and built.

The courtyard area would be an intensive green landscaped roof area and care would be required to ensure sufficient depth of growing medium and drainage is provided for the proposed trees and shrubs, in raised beds. This area would require regular maintenance and plant replacement together with an irrigation

system or facility for regular watering, noting the possibility of climate change, hot summers and drought conditions.

There is very limited space for any tree planting to provide a permanent landscape structure and green softening to the external area. It would be very important that any proposed new trees survive and thrive and therefore not only should the trees be large at time of planting, as proposed, semi mature trees but also the trees should be planted in a structural urban soil, with a large expanse of growing medium spread underground. This can be subject to a landscape condition. If you are minded to approve this application a number of hard and soft landscape conditions would be required.

LBH Biodiversity Officer

There has been no effort to quantify biodiversity impact, so the applicant will need to provide enhancement that is self-evidently well beyond such loss and the expected net gain so that any calculations will be redundant. Mention is made of 'green walls' yet the necessary detail for these is lacking. A mix of tree species is to be preferred across the scheme as a whole. Where space will permit, trees that will grow taller and larger, and live longer should be selected. A number of conditions should be applied.

LBH Housing Enabling

No Comment

LBH Travel Planner

No objections subject to a revised travel plan to be submitted with a £10,000 bond and £5000 monitoring fee

LBH Waste Officer

No Comment

TfL (summary)

The developer has briefly studied the routing and barriers through, to and around the site and concluded (para 6.89 of Planning Statement) that the culvert to the south of the site "presents the opportunity to create a potential new pedestrian link [TfL would add cycling, too] from Byron Road in the East to Masons Avenue and the station beyond".

It is important that the Council considers the feasibility of this and pursues this improved connectivity opportunity, then seeking appropriate developer funding and co-operation through a legal agreement - all in line with HWAAP's policy 19 which states that "all major development proposals should prioritise access by sustainable modes". TfL considers the development generates a considerable increase in trips by sustainable modes requires this kind of intervention. The Council should similarly consider pursuing developer funding towards improving its

quality as designing & funding for better cycling infrastructure is necessary;’ likewise improved waymarking should be sought through a developer contribution: TfL’s preferred design is Legible London signage.

There is potential for significant parking, safety and congestion impacts on the highway unless the applicant agrees to a car-and-permit free agreement with the Council. With regards to the on-site car parking, the proposal for solely disabled access parking is welcomed as in accordance with the aims of the Area Action Plan and the new draft London Plan.

Until improved trip generation and mode share analysis is received, TfL cannot comment on whether the scheme will generate capacity issues for public transport, in particular buses. Further information is required on the proposed service and delivery plan.

The swept paths confirm space is tight but accommodating of the necessary vehicles without loss of safety to users of the site or congestion/queuing on-street. It is recommended a condition requiring all servicing to take place on site to discourage spilling of service impacts on the street (and its bus operation).

TfL accepts the assurances regarding securing a suitable Travel Plan, and likewise for a Construction Logistics Plan. A recommendation for construction vehicles pre-booking arrangement should be feature in the forthcoming detailed CLP to be submitted prior to implementation.

There is little analysis of mode share, census information or trip generation. The survey sites chosen are not a good fit with this location or the greater size/trips likely to emanate from this development. It is requested that the applicant supplements this analysis with a survey of travel patterns from one of the other shared-living sites under its ownership to help TfL understand the travel patterns of this new hybrid residential model.

Ministry of Defence

The Ministry of Defence has no safeguarding objection to the proposal

Environment Agency

The proposed development lies in close proximity to the Wealdstone Brook (main river) currently in culvert. The Wealdstone Brook is currently designated under the Water Framework Directive (WFD) as a heavily modified waterbody and currently achieves ‘moderate’ ecological status. The Thames River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies.

We wish to see culverted watercourses re-opened and re-naturalised, wherever possible, to provide biodiversity and amenity benefits and achieve WFD objectives. We accept that due to the constraints on this particular site, de-culverting would not be practical or provide much benefit. A S106 agreement was

deemed to be a suitable compromise to compensate for the missed opportunity to de-culvert and for the associated loss of buffer zone adjacent to the watercourse.

We have no objections to the proposed development as submitted provided a S106 agreement is drawn up and agreed between the main parties. The settlement contribution of £56,000 would go toward further betterment of the Wealdstone Brook and to ensure the applicant can achieve an environmental 'net gain' by providing off-site compensation for the development. The compensation should contribute towards achieving Water Framework Directive mitigation measures identified for the Wealdstone Brook, such as de-culverting, bank softening and/or in-channel morphology restoration. Works can be identified by a third party, however the Environment Agency must be involved.

Without the S106 agreement we would object to the planning application as submitted, as the proposals would not be in line with Policy DM11 "Protection and Enhancement of River Corridors and Watercourses" (Harrow's Development Management Policies, 2013) and the objectives of the Thames RBMP (2015).

The majority of the site is within Flood Zone 3 which is defined as land having a 1 in 100 or greater annual probability of river flooding. The land following the corridor of the Wealdstone Brook culvert is in Flood Zone 3B (the functional floodplain) this is defined as land where water has to flow or be stored in times of flood. We normally expect any development to be set back from a main river by 8 metres. However, given the site constraints and practical barriers to deculverting, we agreed that the main building/permanent structures would be set back by at least 5 metres from the main river. It was also agreed that non-permanent structures could be placed over the culvert provided it is demonstrated there is no additional loading on the culvert and the access points will be maintained so that the culvert can be maintained and inspected as necessary. The Flood Risk Assessment and associated appendices which include a survey on the culvert are acceptable and in line with what was agreed at the pre-application stage.

We confirm that the proposed s106 financial contribution pertaining to the Wealdstone Brook is acceptable.

Designing Out Crime Officer, Metropolitan Police Service

The development should achieve secured by design accreditation

Thames Water Authority

No objection

5.0 POLICIES

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

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

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

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

5.4 While this application has been principally considered against the adopted London Plan (2016) policies, some regard has also been given to relevant policies in the Draft London Plan (2017), as this will eventually replace the current London Plan (2016) when adopted and forms part of the development plan for the Borough. The document was published in draft form in December 2017. Given that the draft Plan is still at early stages of the formal process it holds very limited weight in the determination of planning applications. Although this weight will increase as the Draft London Plan progresses to examination in public stage and beyond, applications would continue to be determined in accordance with the 2016 London Plan. It is anticipated that the Examination in Public will commence early 2019. The Draft New London Plan showing Minor Suggested Changes, which includes clarifications, corrections and factual updates to the Consultation Draft Plan that would help inform the Examination in Public, was published on 13th August 2018. 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.

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

6.0 ASSESSMENT

6.1 The main issues are;

- Principle of the Development
- Regeneration
- Townscape and Design Quality
- Residential Amenity and Accessibility
- Transport and Parking

- Flood Risk and Development
- Sustainability, the Environment and Ecological Considerations
- Affordable Housing
- Planning Obligations

6.2 Principle of Development

- 6.2.1 The National Planning Policy Framework (NPPF) provides the Government's overarching planning policy, key to which, is a presumption in favour of sustainable development. The NPPF defines three dimensions to sustainable development: an economic role contributing to building a strong, responsive and competitive economy; a social role supporting strong, vibrant and healthy communities; and, an environmental role contributing to protecting and enhancing our natural, built and historic environment.
- 6.2.2 The NPPF identifies a set of core land-use planning principles which should underpin both plan-making and decision-taking. Those of particular relevance to the site are that planning should:
- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs;
 - encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
 - promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas;
 - actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.
- 6.2.3 The spatial strategy for London is set out at chapter 2 of the London Plan. It uses a number of strategic designations to identify areas for more accelerated levels of change, pursuant to the objective of accommodating London's objectively assessed development needs. Among the designations are 'Opportunity Areas' and 'Intensification Areas'. The strategic designation of Harrow & Wealdstone has changed from that of an Intensification Area to an Opportunity Area, with an expectation that higher density residential and mixed-use development on key strategic sites will contribute to the delivery of 3,000 jobs and a minimum of 2,800 new homes within the Area.
- 6.2.4 At a local level, Harrow's spatial strategy (2012) for the plan period 2009-2026, focusses on the Opportunity Area of Harrow and Wealdstone to deliver growth through higher density residential and mixed-use development, as a location with high levels of public transport accessibility and where there is capacity to accommodate and benefit from major change. Local Plan Policy CS1 incorporates a policy commitment to deliver the employment and housing growth figures set out in the London Plan on sites identified and allocated in an area action plan.

- 6.2.5 The Harrow and Wealdstone Area Action Plan (AAP) (2013) seeks to establish the opportunity area as the 'Heart of Harrow', re-assert Harrow's visibility as the capital of Metro-land in London and to reaffirm Harrow town centre's role as a Metropolitan Centre. In recognition of the different issues and opportunities across the entire Heart of Harrow opportunity area, the AAP designates a total of seven sub areas. The application site is located within the 'Wealdstone East' sub area.
- 6.2.6 Policy AAP3 states that development within this sub area will be required to strengthen the district centre, including the High Street's vibrancy and vitality, and improve the environment and identity of the Wealdstone Area. Proposals should also seek to improve pedestrian and cycle access to the Harrow Leisure Centre from Station Road and Wealdstone District Centre

Industrial and Business Land Use Designation

- 6.2.7 The application site is within a designated Business and Industrial Use area, one of the Councils protected employment areas. This designation was underpinned by the Employment Land Studies (2010) conclusions and found sound following examination. As such, the site is of strategic importance within Harrow.
- 6.2.8 The proposal seeks a change of use of the site from an employment use to a mixed use featuring co-living accommodation with business floorspace and artists' studios (Use Class B1a/c) and a café/restaurant (Use Class A3). As the site is located within Harrow and Wealdstone Opportunity Area, Policy AAP15 (Supporting the Business Sector in Wealdstone) applies to the proposed change of use. The proposal should also be considered in the context of Policy DM31 (Supporting Economic Activity and Development) and Core Strategy Policy CS10.
- 6.2.9 Policy CS1(0) of the Harrow Core Strategy states that the Borough's stock and industrial premises will be monitored and managed to meet economic needs. Any release of surplus stock for other uses, having regard to the most up-to-date monitoring of the demand and supply balance, will be considered in accordance with the following sequential approach:
- Non-allocated sites
 - Poorer quality allocated sites not within strategic industrial locations
 - Other allocated sites not within strategic industrial locations
 - Poorer quality sites within strategic industrial locations; and
 - Other allocated sites within strategic industrial locations.
- 6.2.10 Policy DM31 of the Harrow Development Policies (2013) has three parts. Part (A) supports the intensification, renewal and modernisation of existing industrial and business floorspace where the development complies with other relevant policy considerations. Part (B) supports proposals for enabling-mixed use development where this is necessary to facilitate the intensification, renewal and modernisation of existing industrial and business floorspace. Proposals must demonstrate that; the enabling development is necessary to facilitate the delivery of the proposed industrial/business use floorspace, maximise the amount of industrial business floorspace to be provided as part of the mix, achieve demonstrable improvements in the sites suitability and viability and ensure there would be no conflict between

the enabling uses and the industrial/business use activities within or surrounding the site. Part (C) covers surplus industrial and Business Use Land and outlines the sequential approach and active marketing required

- 6.2.11 Policy AAP15 has three elements. Part (A) of the policy is a positive statement supporting economic development within the AAP area. Part (B) addresses proposals for enabling mixed use development on site that have been allocated for development within the AAP (i.e. those sites in Chapter 5 of the AAP); these are business and industrial sites where the Council has proactively accepted the principle of development, including changes to the industry / business uses on the site. Part (C) addresses sites that are used for business / industry purposes but where the principle of the loss / change of employment uses has not been established; the policy includes a number of elements that need to be addressed for the Council to accept the principle of a change of use away from existing employment uses / loss of employment land.
- 6.2.12 The existing employment on site is largely industrial in nature with a total floorspace of approximately 1830m². While No. 55 is currently vacant (equating to 605m²), the remainder of the site is occupied by workshop buildings accommodating window glazing and ventilation manufacturing businesses. It is understood that the existing businesses sustain approximately 21 jobs of which 10 are full-time.
- 6.2.13 The proposal seeks to deliver a residential-led mixed use development with 222 co-living units, 370m² of incubator workspace/artist studios (Use Class B1a/c) in addition to 193m² for a café/restaurant (Use Class A3). The proposal therefore represents a loss of commercial floorspace of approximately 1267m². The proposed B1 workspace, cafe/restaurant and employment related to the management/maintenance of the co-living accommodation could provide up to 65 full-time jobs which would result in an increase of approximately 44 jobs (based on the Employment Densities Guidance 2015). This would equate to approximately 41 jobs for the B1 workspace, 13 jobs for the café/restaurant and 11 jobs associated with the management/servicing of the building.
- 6.2.14 The direction of travel with the draft London Plan (2017) is that there should be retention of employment floorspace rather than by employment yield, which is the current mechanism for quantifying how much employment floorspace should be provided within a development. It is noted that the proposed development would not re-provide the current amount of employment floor space that is currently on site. The proposed development would therefore not comply with policy E7 of the draft London Plan (2017) insofar as the retention of floorspace. However, it is noted that this still a draft document, and whilst carrying some weight, is not adopted policy.
- 6.2.15 Locally, the Harrow & Wealdstone Area Action Plan (2013) is the relevant policy framework for developments coming forward within the Harrow Opportunity Area. Specifically, Policy AAP15, based on the information submitted, the proposal would find favour with a number of points under AAP15(C).

- 6.2.16 Supporting the loss of the existing buildings on the site, the applicant has provided a Commercial Property Assessment Report which has identified that the buildings are in a relatively poor state of repair. Furthermore, the dated layout of the buildings do not lend themselves to modern requirements for such spaces. Whilst there is the possibility for the buildings to be repaired to a satisfactory standard, the rent levels and short term tenancy contracts do not make this a financially viable option.
- 6.2.17 Officers acknowledge the limited marketing which has been undertaken for the site to accord with AAP15(C)(a). The submitted Commercial Property Assessment Report states that a full and continuous marketing campaign was undertaken between January 2016 and July 2017 for No. 55 Palmerston Road and despite receiving good levels of enquiries, the building failed to attract tenant interest. The industrial units were put onto the market in March 2018 and are yet to receive tenant enquires. The marketing that has been done, suggests that there has been some interest in the site, however, potential tenants have not been satisfied with the dated conditions and layouts of the building to meet modern business demands. It is noted that there is some storage within the site, however, the physical constraints of the site in terms of access arrangements, do not lend it to being easily intensified. This adds weight in favour of the redevelopment of the employment space offer.
- 6.2.18 In determining the acceptability of the loss of the existing floorspace, due consideration should also be given to the offer of replacement floorspace / employment yield. The proposal would provide approximately 370m² of modern flexible (co-working) floorspace. This type of office space would particularly favour small start-up businesses. Additionally, the proposed employment floorspace would provide 193m² of café/restaurant (Use Class A3). As noted above, the proposed employment floorspace is anticipated to provide an approximate employment yield of 60 – 65 employees for the site which is noticeably higher than the employment yield of the current site.
- 6.2.19 Officers acknowledge that the proposed development would not strictly accord with the direction of the draft London Plan (2017) as it would result in the net loss of employment floorspace from the existing site. However, noting the specific characteristics of employment space supply and demand in the borough, which identifies significant potential for new office development on town centre sites and mixed use development (Harrow Employment Land Review 2010), the proposed office floorspace would be in line with London Plan Policy 2.7 on Outer London and contribute to one of the objectives of Local Policy AAP15, which seeks to deliver accommodation for small and medium sized businesses. Furthermore, the proposed employment floorspace offer would result in a much more modern, flexible and desirable level of floorspace, which would be more attractive to potential tenants. By reason of the quantum, quality and type of floorspace being provided, this would result in a higher employment yield for the site.
- 6.2.20 The proposal provides a reduced quantum of B1 employment floorspace and the commercial floorspace proposed would result in a significant shift in the nature of the employment space at the site, away from general industry and towards office-led employment. Notwithstanding this, the quality of employment space would be

superior to that which currently exists on the site with a likely significant increase in job density. For these reasons officers are satisfied that material considerations exist to justify the reduced quantum of employment floorspace and on balance, the proposal would make a contribution towards the wider policy and regeneration objectives of the Opportunity Area with regards to employment.

- 6.2.21 The applicant proposes to directly manage the employment space and would therefore control rental levels. Affordability would be a key component of the workspace by external users. Officers consider that an employment management plan be agreed through the S106 agreement to secure details on the management of the b1a/c space and the services provided to the occupants/businesses.

Co-living Accommodation

- 6.2.22 Policy 3.3 of the London Plan seeks to increase housing supply in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford. Core Policy CS1(l) states that 'new residential development shall result in a mix of housing in terms of type, size and tenure across the Borough and within neighbourhoods, to promote housing choice, meet local needs and to maintain mixed and sustainable communities'. Policy AAP13 of the Harrow and Wealdstone Area Action Plan states that to ensure, mixed sustainable communities are created within the Heart of Harrow, proposals for residential development should provide a range of housing types.
- 6.2.23 The proposed development would feature 222 co-living units. The layout and management of co-living accommodation is unlike conventional housing and therefore does not fall within any Use Class (i.e. is sui generis). There are no adopted planning policies which relate specifically to this type of housing. The draft London Plan (2017) however, does provide support for this type of accommodation under Policy H18 and sets out a prescriptive list of requirements that a proposal must achieve to be considered to fall within the definition of a large-scale purpose-built shared living scheme. On this basis, it would be instructive to frame the assessment of the proposed land use on the draft London Plan policy.
- 6.2.24 Policy H18 of the draft London plan (showing minor suggested changes dated 13th August 2018) states that large-scale purpose built shared living development should meet the following criteria;
- It is of good quality and design
 - It contributes towards mixed and inclusive neighbourhoods
 - It is located in an area well-connected to local services and employment
 - It is under single management
 - Its units are all for rent with minimum tenancy lengths of no less than 3 months
 - Communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least

- a. Convenient access to a communal kitchen
 - b. Outside communal amenity space
 - c. Internal communal amenity space
 - d. Laundry and drying facilities
 - e. Concierge
 - f. Bedding and linen changing/room cleaning services
- Management Plan is provided
 - It delivers a cash in lieu contribution towards conventional C3 affordable housing

6.2.25 The Collective Ltd is a property development and management company that specialises in delivering and operating high quality, shared living rental accommodation across London. Established in 2010, they currently operate circa 750 co-living units across seven sites in London. The largest of these sites 'The Collective Old Oak' features 546 co-living units and 3000m² of serviced office floorspace. A supporting document provided by the applicants on demographics and rationalisation of space states that the average age of residents within the Collective Old Oak is 29 and the median salary is £33,000.

6.2.26 The application is also supported by a demand assessment undertaken by Knight Frank (estate agency). The report identifies that the number of privately rented sharer households in Harrow has more than doubled during the 2001 to 2011 period. With the exception of young families, the 'sharer' groups have witnessed the largest growth in real terms within the borough. The average house price in Harrow is 14-15 times higher than the median salary of a worker or resident in Harrow. Many residents cannot afford to purchase their own home and therefore resort to renting. The report further states that despite the high average personal income of £34,243, many private renters are only able to afford either a studio or room within a HMO dwelling. This highlights the potential opportunity for an increase in supply of dwellings suitable for single occupancy. Additionally, if high quality stock levels for single occupancy units were to increase, this could reduce overcrowding in HMO's and properties that have been previously converted within the borough, thereby releasing the housing back on the market for the increasing young family cohort.

6.2.27 Officers consider that the proposed development would be a high quality scheme that would raise standard of architecture in the area (detailed further in section 6.4 of the report). The proposed housing product would contribute towards a mixed community and is located in close proximity to the town centre and sustainable transport modes. Furthermore, the proposed scheme would provide a satisfactory quantum of internal and external amenity space and communal facilities for the future occupiers and the minimum tenancy lengths and management plan are to be secured through the Section 106 agreement. Officers consider that the proposed co-living accommodation would satisfy the requirements as set out in policy H18 of the draft London Plan (2017).

Principle of Development Conclusion

- 6.2.28 As set out above, whilst the proposed residential-led mixed use redevelopment of the site would not strictly accord with elements of the development plan (specifically Local Plan Policies AAP3 and AAP15 which concern, amongst other matters, land uses at the application site). However, given the site's context within the Harrow and Wealdstone Opportunity Area, its proximity to Wealdstone town centre and accessible location, the strategic priority afforded to housing and compliance with other elements of the development plan as detailed in this report, officers are satisfied that material considerations exist to justify the non-conformity with these particular site-specific elements of the development plan.
- 6.2.29 The application includes the provision of replacement employment floorspace, which although reduced in quantum, would be of a higher quality and result in a greater employment yield, in accordance with strategic requirements. The proposed co-living accommodation would meet an emerging need as supported within the draft London Plan and a planning obligation would ensure the development will be managed and maintained in a manner which would ensure the continued quality of the accommodation.
- 6.2.30 The proposal would make a noteworthy contribution towards the wider policy and regeneration objectives of the Opportunity Area, including housing and employment. Having regard to compliance with these elements of the development plan, together with other consideration in this report with respect to design, amenity, infrastructure, servicing and highways; the principle of the development is supported by officers.

6.3 Regeneration

- 6.3.1 The NPPF reaffirms the Government's commitment to securing economic growth. Paragraph 81 of the NPPF advises that planning policies should:
- set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
 - set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
 - seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
 - be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.
- 6.3.2 This advice is reflected in the London Plan's designation of intensification and opportunity areas and as taken forward in Harrow's Core Strategy and Area Action Plan (AAP) for Harrow & Wealdstone – the 'Heart of Harrow'. Core Strategy Policy CS1P supports mixed use development where this secures employment generating development and diversification of Harrow's economy.

- 6.3.3 In addition to this, the Local Development Plan identifies Wealdstone as a focus for growth and regeneration. The Core Strategy envisages that housing led regeneration will support the physical renewal of the High Street and enhance the links with the wider business and industrial capacity of the area.
- 6.3.4 The Heart of Harrow includes major parts of Greenhill, Marlborough and Wealdstone wards. DCLG indices of deprivation (2011) indicate a relatively high level of Multiple Deprivation in these wards, especially Wealdstone, which exhibits some of the highest levels of deprivation (Income, Health and Disability; and Education/Skills and Training) within Harrow and nationally. These wards also experience the lowest life expectancy in the Borough.
- 6.3.5 As concluded at a later stage of this report, it is considered that the proposal would introduce a high quality development into the Harrow and Wealdstone Opportunity Area. The potential employment yield of the proposed development has been estimated by the applicant to be up to 65 full-time employees. The proposal would therefore make a welcome contribution to the provision of additional employment opportunities within the Heart of Harrow. It is envisaged that this will further advance the regeneration objectives in Wealdstone District Centre

6.4 Townscape and Design Quality

- 6.4.1 Chapter 12 of the NPPF states that 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. In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 6.4.2 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter seven, which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. Other relevant design policies in this chapter include specific design requirements relating to inclusive design; designing out crime; local character; public realm; architecture; tall and large scale buildings; and heritage assets.
- 6.4.3 Policies 7.4B and 7.6B of the London Plan (2016) set out the design principles that all boroughs should seek to ensure for all development proposals. The London Plan policy 7.4b states, inter alia, that all development proposals should have regard to the local context, contribute to a positive relationship between the urban landscape and natural features, be human in scale, make a positive contribution and should be informed by the historic environment. London Plan policy 7.6B states, inter alia, that all development proposals should; be of the highest architectural quality, which complement the local architectural character and be of an appropriate proportion, composition, scale and orientation. Development should not be harmful to amenities, should incorporate best practice for climate change, provide high quality indoor and outdoor spaces, be adaptable to different activities and

land uses and meet the principles of inclusive design. These broad principles are carried through in the proposed policies D1 and D2 of the Draft London Plan (2017).

- 6.4.4 Harrow's Core Strategy Policy CS1 seeks to protect the character of Harrow's suburbs and town centres. Policy DM1 on Achieving a High Standard of Development of the Development Management Policies Document requires all development proposals to achieve a high standard of design and layout. This assessment of the design and layout relates to the massing, bulk, scale and height of the proposed building; the appearance; context; space around buildings; the need to retain or enhance existing landscaping; the functionality of the development; the safe, sustainable and inclusive access.
- 6.4.5 Policy AAP4 of the Harrow and Wealdstone AAP seeks to achieve a high standard of development throughout the Heart of Harrow. The policy requires development within the Heart of Harrow to use high quality, durable and serviceable materials to the external finishes of buildings; contribute positively to the wider context in terms of form and ground floor use and incorporate secure by design principles amongst others.

Layout, Scale, Massing and Townscape Character

- 6.4.6 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 proposed development would have a maximum height of 29.5m and as such, would fall just under the threshold size set for the referral of the planning application to the Mayor.
- 6.4.7 However, the AAP also 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. Planning permission has been granted (subject to completion of a legal agreement) for the provision of a ten and fifteen storey building (maximum height of 48.5m) immediately to the west of the application site. However, the residential and commercial buildings adjoining the application site to the south and east are predominantly two/three storey's in height.

6.4.8 Policy AAP6 states that proposals for taller buildings that project above the prevailing height of the surrounding area must be justified in community benefit as well as urban design terms and should conform to the general design requirements:

- Be of a high standard of architectural quality and design
- Protect and preserve existing important views and conserve and enhance the significance of heritage assets
- Be sensitive to, and engaging with the street environment and designed to encourage use of the street by pedestrians

- 6.4.9 The application site consists of a broadly L- shaped parcel of land located on the southern side of Palmerston Road with an approximate area of 0.22 hectares. The site is presently occupied by three buildings ranging from two to three storeys in height. The surrounding land use is mixed, with designated industrial and business use to the east, west and north of the application site and residential uses adjoining the application site to the south. The existing buildings on the site are of a scale and layout that is appropriate to the employment function of the subject site and adjacent land. However, the buildings themselves are of relatively low quality and are of little architectural merit.
- 6.4.10 Planning permission has been granted (subject to the completion of the s106) for the redevelopment of the adjoining site to the west (planning reference P/1619/16). That parcel of land would form part of a wider development site ('the Origin Housing Scheme') for the provision of 186 residential units, with a mix of office floorspace and commercial/community floorspace in buildings between 1 and 17 storeys high. Building C of the approved scheme (immediately adjacent to the application site to the west) would be 10 and 15 storeys in height and would contain 80 flats and two separate commercial / community units at ground floor. Building E would be located to the rear of Building C and would be four storeys high featuring 7 flats and a flexible commercial and community use at ground floor level. Officers acknowledge that the development is yet to commence on the site, but there is a resolution to grant the scheme subject to the completion of the S106. The S106 is currently with the GLA and Officers understand that it is anticipated that this would be concluded imminently. On this basis, the proposed layout, massing and built form established in the approval of that scheme is a material planning consideration. Forethought is also given to the emerging local context including the New Civic Centre, Byron Quarter and Poets Corner.
- 6.4.11 The proposed building would have a rectangular form with a maximum depth of 54m and width of 22m. At ground floor level, the proposed building would be sited approximately 2.5m from the adjoining western boundary, between 4.5m-9m from the adjoining eastern boundary and between 12m-16m from the adjoining southern boundary. The proposed building would have a maximum height of 9 storeys (29m). The layout, massing and design of the proposed building has been carefully considered with respect to the forthcoming development context to the west of the application site, the residential character to the south of the application site, the existing character and built form to the east of the application site (with thought to future development) and the functional requirements of the proposed co-living housing product.
- 6.4.12 The redevelopment of the site, in conjunction with the emerging local development context, represents an opportunity for the site to improve its contribution to the street scene while creating its own distinct character and sense of place, compatible with the different scale and character of the uses adjoining the application site. The proposed café/restaurant would provide an active frontage at ground floor level and the pedestrian colonnade and ground floor workspace would ensure that there would be a sustained level of footfall around the site beyond the frontage.

- 6.4.13 The height and massing of the proposed development has been carefully judged. Key design principles include the various set-backs and stepping of the elevations, breaking up of the mass, location of residential aspects, terraced amenity space and an internal link bridge, articulation of the massing and detailing of the external finish. The massing and height successfully addresses the immediate and forthcoming built context of the site by stepping down in scale from the north to south of the site to respond to the character and proportions of the two and three storeys Victorian terraced housing along Masons Avenue, with the tallest part of the building positioned towards the northern edge. Additionally, the stepping away of the upper floors from the eastern and western boundaries and breaking up the mass of the building would ensure it does not appear overly bulky or unremitting, given its rectangular form.
- 6.4.14 The proposed building is considered to be a 'taller building' as defined by Policy AAP6 of the Harrow and Wealdstone Area Action Plan. At nine storeys in height, the proposed building would be considerably higher than the adjoining commercial and residential units. However, the building would still be up to five storeys (approximately 18.5m) lower than Building C which was approved (subject to completion of the s106) to the west of the site. It is noted that the transformational height of the adjoining development was in part justified by ambition to establish high quality gateway buildings in line with the sites allocation in the development plan. In this regard, the proposed nine storey height of the subject building would not compete against the intended design rationale to provide buildings that would form a distinctive 'gateway' between Wealdstone and Harrow. Rather, the proposed development would appear subservient and would support the intended layout and design rationale of the adjoining site.
- 6.4.15 Two Design Review Panels (DRP's) were convened during the course of the planning application. The purpose of these DRP's was to enable a panel of experts to consider the scheme and to provide officers with their opinion on the design quality of the proposed development. The DRP panel made a number of suggestions and the design team have subsequently addressed all the major points. The proposed building would be of a high standard and would have a design and layout that would be an appropriate response to its location in urban design terms and in the context of the emerging development proposals. As discussed below, the proposed building would protect and preserve important views, the significant of heritage assets and would have an active frontage and thoughtful public realm to encourage footfall and enhance the pedestrian experience.
- 6.4.15 It is considered that the applicant, thorough a carefully considered design process, has responded to the challenging constraints of the site. Officers are of the opinion that the proposed layout and form of the building have been well considered and the overall design presents an appropriate form of development on the site. The proposal acknowledges its context and sits comfortably with the adjoining buildings and would provide an attractive and functional environment for intended users. The scheme is considered to comply with the general design requirements for 'taller buildings' as detailed under Policy AAP6.

Architectural Appearance and Materials

- 6.4.16 The proposed building, by virtue of its siting and height, would be visible from various locations within the vicinity. The applicants have given considerable thought to the proposed elevational character and architectural detailing with the aspiration to create calm and reposed elevations while using materials which relate to the surrounding residential buildings.
- 6.4.17 Comments by both the Design Review Panel and design officers during pre-application discussions have been addressed in the architecture and the resulting proposal is for a cohesive design with a strong identity. Each of the elevations would respond to the different viewpoints. The proposed front elevation facing Palmerston Road would feature an expressed double height order in the structural grid to provide an active frontage, an entrance colonnade and circular windows on the eighth floor. The proposed residential windows from the second to seventh floors would feature horizontal and vertical opaque spandrel pieces which are inspired by the Whitefriars Glass Colour. The proposed southern elevation would be prominent from George Gange Way flyover and would feature stepped terracing and landscaping on the fifth and eighth floors.
- 6.4.18 Officers consider that the articulation of the different elements of the scheme have been sensitively handled and the public ground floor is well defined and proportionate. A high quality palette of materials is proposed, and the predominant use of brick would ensure longevity and allow the proposal to sit comfortably in the context. The final choice of materials and quality of detailing will have a significant impact on the quality of development as a whole. In this respect, a planning obligation will be secured requiring the applicant to retain the existing architect or one of equivalent standard until the development is completed, or, to submit a Design Code prior to the commencement of the development. Key details such as window reveals, balconies, ground floor frontages and samples of facing materials will be secured through conditions.

Heritage Assets

- 6.4.19 Paragraph 193 of the NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Paragraph 194 goes on to state that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 6.4.20 London Plan Policy 7.8 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. Local Plan Policy DM7 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

- 6.4.21 The application site does not contain or adjoin any listed buildings and is not in a conservation area. However, there are three designated heritage assets in the area. These are:
- Grade II Listed Harrow and Wealdstone railway station and Platform, 180m from the site
 - Locally Listed Building at 21 the bridge, 150m from the site;
 - Locally Listed Building at 36 High Street, 222m from the site.
- 6.4.22 The submitted Heritage, Townscape and Visual Impact Assessment concludes that the proposed development would not impact upon the heritage assets and that the special interest of the listed buildings would be preserved. The Council's Conservation Officer concurs with the conclusion. On this basis, it is considered that the historical significance of the three heritage assets would be preserved and the proposal would therefore satisfy national policy, Policy 7.8 of the London Plan (2016) and Harrow Local Plan Policies CS1B and DM7.

Strategic and Local Views

- 6.4.23 The application site does not lie in any of the strategic views identified in London Plan Policy 7.11 and the London View Management Framework (LVMF) Supplementary Planning Guidance. Policy DM3 of Harrow's Development Management Policy Local Plan identifies local protected views in Schedule 3 to be safeguarded in accordance with the adopted Harrow Views Assessment document (2012). The application site lies within the Wider Setting Consultation Area of two locally protected views:
- Protected Views Setting Corridor: Roxborough Road Footbridge
 - Protected View Setting Corridor: Country Park at Wood Farm
- 6.4.24 The application is supported by a Heritage, Townscape and Visual Impact Assessment which considers 8 separate view points. Importantly, it assesses the impact of the development of the two locally protected views cited above. The visualisations within the submitted visual impact assessment demonstrate that the proposed development would not give rise to any greater impacts to the view over and above the cumulative context.
- 6.4.25 Having regard to the visualisations and analysis within the submitted Visual Impact Assessment, officers are satisfied that the development would maintain the viewers' ability to recognise and appreciate the landmark qualities of St. Mary's Church and the Harrow Weald Ridge and would have no effect on the composition of protected views identified in Harrow Development Management Policy Local Plan.

Landscaping and Public Realm

- 6.4.26 Policy 7.5 of the London Plan states that landscape treatment, street furniture and infrastructure should be of the highest quality and opportunity for greening should be maximised. Policy DM2 of the Harrow Development Management Policies states that the location, design and layout of development, and any associated improvements to the public realm, transport and other infrastructure, will be required to contribute to the creation of lifetime neighbourhoods. Policy AAP7 states that all development proposals within the Heart of Harrow should contribute to the creation of a high quality, accessible, safe and attractive public realm.
- 6.4.27 The public realm around the site is a comparatively small area but has been well handled. Opportunities have been taken to identify and define the extent through distinctive, patterned ground treatments. While the potential for greening is limited, the proposal to introduce green walls with a trellis system and the inclusion of new street trees are positive additions. The Council's Landscape Officer has advised that as the space for tree planting is limited, it would be important that any proposed new trees survive and thrive and therefore not only should the trees be large at time of planting, as proposed, semi mature trees but also the trees should be planted in a structural urban soil, with a large expanse of growing medium spread underground. Additionally, the proposed green roof could be improved to provide greater ecological enhancements.
- 6.4.28 The communal external amenity spaces have also been well designed, and it is commendable that within a tight site, there are a number of different types of external, landscaped space proposed. From a strategic perspective, the design team have considered the potential for future links from the site through to the neighbouring approved scheme to the west of the application site. As enhanced pedestrian and cycling links are a key objective within the Wealdstone East subsection, a commitment to activating the future links with the adjoining site are deemed appropriate to secure by way of a planning obligation. Conditions on the landscaping and lighting of the space, as well as conditions on its management, maintenance and use will be secured to ensure that it delivers a space of quality that can be used and appreciated by residents, workers and visitors alike.

Designing out crime

- 6.4.29 Policy 7.3 of the London Plan, Policy CS1(E) of the Harrow Core Strategy and Policy AAP4 of the Harrow and Wealdstone Area Action Plan seek to ensure developments incorporate 'secure by design/designing out crime' principles. The applicant has considered the interaction of the building with the proposed public realm, ensuring that the public spaces and pedestrian route along the boundary of the site is largely overlooked by active commercial uses at ground floor to generate a degree of daytime activity within the development and to prevent anti-social behaviour.

- 6.4.30 The residential units would overlook the pedestrian routes and communal areas to the rear and therefore provide a high degree of natural surveillance. A suitable condition is recommended to ensure the development will achieve Secured by Design certification prior to occupation. On this basis, the proposal is considered acceptable with respect to designing out crime and complies with the above policies.

Conclusion on Townscape and Design Quality

- 6.4.31 Officers consider that the provision of a taller building in this location within the opportunity area is appropriate. Through its scale form and architectural language, would provide a distinctive and high quality scheme that would make a positive contribution and enhance the urban character and status of Wealdstone

6.5 Residential Amenity and Accessibility

- 6.5.1 A core principle of the NPPF is to always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. Policy 7.6 of the London Plan states that the design of new buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings in relation to privacy, overshadowing, wind and microclimate. In addition, London Plan states that tall buildings should not affect their surroundings adversely in terms of microclimate, wind turbulence and overshadowing amongst other things. London Plan Policy 7.15 seeks to reduce and manage noise associated with development.
- 6.5.2 Core Strategy Policy CS1 K requires a high standard of design and layout across all tenures within a development and consistent with the London Plan and its associated SPG. Policy DM1 of the Development Management Policies requires all development to achieve a high standard of privacy and amenity, and sets out a range of criteria for the consideration of the same. Policy AAP4 of the Harrow and Wealdstone Area Action Plan requires new homes within the Heart of Harrow to achieve a high standard of residential quality. The Council's Residential Design Guide supplementary planning document is also relevant

Visual Impact, Privacy and Outlook

- 6.5.3 Harrow Local Plan Policy DM1 undertakes to assess privacy and amenity considerations having regard to, among other things, the prevailing character of amenity and the need to make effective use of land; the relationship between buildings and site boundaries; and the visual impact when viewed from within the buildings and outdoor spaces.

- 6.5.4 The application site is located in an urban area. The surrounding area has a variety of building styles of varying heights and sizes, and a variety of land uses. As such, the character of the surrounding area is mixed. The nearest properties to the site are as follows:
- A terrace of two-storey residential properties lies immediately to the south of the application site (nos. 49 -61 Masons Avenue)
 - The application site is bounded to the east by a shared vehicular entrance to the site. Beyond this is No.59 Palmerston Road which is a two-storey rectangular building which runs parallel to the application site. The building is currently occupied by City Dry Cleaning Company. Beyond this building to the rear, the application site adjoins the rear of units 5 and 6 of the Palmerston Centre
 - The application site is bounded to the west by a redundant detached dwellinghouse and workshop buildings. However, planning permission has been granted (subject to completion of the S106) for the redevelopment of the site to include a 10 to 15 storey mixed use building with commercial uses on the ground floor and residential uses on the upper floors
 - A builders merchant, Travis Perkins, lies to the north of the application site
- 6.5.5 The proposed building would be significantly higher than the existing buildings on the site and would therefore have a noticeable visual impact within the surrounding area. As set out earlier in the report, it is considered that the principle for a ‘taller building’ is justifiable in accordance with Policy AAP6. However, it is also acknowledged that the proposed building would undoubtedly give rise to a significant change in outlook and in some instances actual and perceived loss of privacy, for the occupiers of neighbouring properties. A limited number of residential units on the east facing flank elevation of the approved Origin Housing Scheme would be particularly impacted. The impact of the proposal on outlook and privacy needs to be balanced against the other development plan policies application to the development, particularly if the necessary growth is to be delivered within one of London’s opportunity areas.
- 6.5.6 Taking the above matters into account, it is considered on balance that the harm in terms of the impacts on the visual and residential amenities of some neighbouring occupiers is outweighed by the desire to achieve the above-mentioned planning objectives. The communal roof gardens/terraces could give rise to additional overlooking. However, it is considered that adequate mitigation could be achieved by obscuring sections of the enclosure to the communal roof gardens/terraces. Such mitigation may be secured as a condition.

Daylight and Sunlight

- 6.5.7 The applicant has submitted a daylight and sunlight report that considers the impact of the proposal upon the existing occupiers and the proposed Origin Housing Scheme. The tests were undertaken in accordance with the Building Research Establishment (BRE) guidelines with specific reference to Vertical Sky Component (VSC), No-Sky Line Contour (NSC) and Average Daylight Factor (ADF) for calculating daylight and the Annual Probable Sunlight Hours (APSH) method to calculate sunlight. The Council has engaged the services of a specialist

consultant to provide independent appraisal of the applicant's daylight and sunlight assessment. The Consultant has endorsed the methodologies employed and has provided specific comments where necessary in relation to the assessment findings.

- 6.5.8 The BRE Guidelines are intended for building designers, developers, consultants and local planning authorities. The advice it gives is not mandatory and should not be used as an instrument of planning policy. Of particular relevance, it states: "This guide is a comprehensive revision of the 1991 edition of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice. It is purely advisory and the numerical target values within it may be varied to meet the needs of the development and its location."
- 6.5.9 The following residential properties were considered within the assessment as those within sufficient proximity that they may see a potential impact to their daylight and sunlight amenity;
- 47 – 73 Masons Avenue (Odd numbers only)
- 6.5.10 The terraced dwellings are located to the south of the application site. The residential properties have gardens of 23m in depth and the rear elevation of the proposed building would be sited a further 12.5m – 16m away from the shared boundary. The southern end of the proposed building steps down in height to five storeys.
- 6.5.11 The primary VSC assessment results for (for daylight) have shown that all windows within all of the Masons Avenue dwellinghouses would retain in excess of 0.8 times their former value and are therefore fully compliant with the BRE criteria. The further NSC analysis shows that there is no reduction beyond the BRE targets to any of the rooms assessed.
- 6.5.12 The proposal is situated to the north of the respective terraced dwellinghouses so the majority of windows facing the scheme are not within 90 degrees of due south and therefore not relevant for assessment. Where the return windows do face within 90 degrees of due south, when assessed under APSH sunlight assessment, the results show that the windows would retain full compliance with BRE target values.
- 6.5.13 The council's independent specialist consultant has verified that the guidelines are satisfied in relation to these properties.
- Origin Housing Scheme
- 6.5.14 Building C of the Origin Housing Scheme would be situated directly to the west of the application site and would feature residential units facing the shared boundary with the application site. In particular, the scheme includes some single aspect units with inset balconies and single aspect rooms serving bedrooms

- 6.5.15 The 'Origin Housing Scheme' was considered in two separate studies. The first compares the existing buildings with the proposed applications scheme, to establish the likely change in daylight and sunlight conditions with the application scheme implemented. The second was a 'mirror image' analysis to establish whether alternative targets are reasonable based on the impact of the neighbouring buildings' impact upon itself. For both situations, only the ADF value were considered on the basis that the adjoining scheme has not yet been constructed / occupied.
- 6.5.16 For the first study, of the 108 rooms tested, 99 would retain the minimum target values in relation to their particular room use. Out of the 9 rooms that will be reduced to below the minimum values, 8 will be living/kitchen/dining rooms and 1 bedroom. It is noted that in modern developments such as the proposed 'Origin Housing Scheme' a 1.5% ADF is commonly accepted for the open plan living/kitchen layout. The results indicate that there will be retained ADF values of 0.4% to 0.8% to three of the lower rooms. This would undoubtedly impact the potential enjoyment of the space by the future occupiers.
- 6.5.17 The specialist consultant in reviewing the submitted daylight and sunlight report has noted that the rooms which demonstrate the greatest reductions are all in the same part of the development, one above the other. This suggests that the design (of the Origin Housing Scheme) contributes to the restriction of daylight availability, their sensitivity to changing conditions and reliance on daylight over neighbouring land. Furthermore, the rooms are recessed behind balconies restricting the view of the sky, and are therefore 'blinkered' by their own neighbouring development block, take all their daylight from over the application site and are deep spaces with a high daylight expectation. It is concluded that, in the opinion of the specialist consultant, adhering rigidly to the minimum ADF standards would significantly restrict development opportunity on the subject site. While the individual impacts are below minimum standard, the potential for these to be significantly reduced with a neighbouring development in place should have been anticipated.
- 6.5.18 With regards to the 'mirror image' study based on the 108 habitable rooms considered, the test suggests that 105 rooms would either see the same or lower degree of impact as a result of the application scheme when compared to a mirror of the Origin Scheme. The remaining three rooms in the same location as the first study, would see a comparative worsening when compared to the mirror image scheme. Whilst this suggests that there is a possibility to change the design to reduce the impacts to these particular rooms, this would likely be at a cost of reducing the overall massing or transferring impacts to other areas. The specialist consultant has stated that when considering the overall impacts, both positive and negative, one might consider that the application scheme should not be considered to have a greater impact than a 'mirror' image of the 'Origin Housing Scheme' and therefore these alternative targets should be considered acceptable.
- 6.5.19 As detailed above, it is evident that the proposal would result in some daylight and sunlight impacts in relation to neighbouring residential units on the adjoining Origin Housing Scheme. These impacts are regrettable, but accepted in the context of the site redevelopment in an opportunity area, where intensification is encouraged

by local and London Plan Policies. Furthermore, an informative attached to the officers report for the 'Origin Housing Scheme' advises that the windows in the flank elevation (facing the application site) would not prejudice the future outcome of any application which may be submitted in respect of the adjoining property. This therefore acknowledges the sensitive location of a select number of flats, their single aspect nature and the reliance on daylight from the adjoining application site.

- 6.5.20 Taking into account the conclusions of the specialist consultant, the extent and degree of daylight and sunlight losses that would occur, and the need to balance the efficient use of the previously developed site, it is concluded that the proposal would maintain an appropriately high standard of amenity for neighbouring residential occupiers.

Noise and Disturbance

- 6.5.21 London Plan Policy 7.15 seeks to reduce and manage noise associated with development. Local Plan Policy DM1 requires a high standard of amenity taking into account among other things, noise, hours of operation, and vibration.
- 6.5.22 A noise assessment has been submitted with the application. The report identifies that existing noise levels are principally dominated by existing road traffic noise from surrounding streets, with some contribution from neighbouring commercial and industrial uses. The report concludes that preliminary calculations confirm that noise intrusion can be adequately controlled using appropriately specified external wall construction. The noise levels experienced of the proposed balconies are anticipated to be below the WHO upper guideline value of 55 db(A) for areas of external amenity so no further mitigation is deemed necessary in relation to this. With regards to operational noise, environmental acoustic design targets for building services installations associated with the development have been recommended. The Council's Environmental Health officer has reviewed the documents and has not raised an objection to the proposal, subject to noise mitigation conditions.
- 6.5.23 Officers consider that suitably worded conditions would ensure that potential noise and disturbance associated with this operation is mitigated. In terms of commercial/community activity, conditions are proposed on the general hours of use as well as the use of amplified sound, plant and machinery and the extension of the commercial activity outside the building to ensure reasonable compatibility between the commercial users and the living conditions of occupiers residing within and surrounding the development.

Light Spill

- 6.5.24 The proposed development is likely to result in some light spillage, given the scale and height of the proposed building. Details of lighting have not been submitted for consideration. However, Officers consider that this is not expected to have a more significant impact than any other new development in an urban environment. It is proposed that details of lighting associated with the development be controlled through a planning condition

Conclusion of Neighbouring Amenity Impacts

- 6.5.25 The assessment above has been based on the information provided by the applicant and analysis by officers and independent consultants. It is acknowledged that that the proposal would bring about a significant change in outlook for neighbouring occupiers, and that daylight impacts from the development in relation to neighbouring properties would be likely to occur. Officers consider that such impacts can be anticipated if growth is to be delivered within the Opportunity Area. It is therefore considered that, on balance, subject to a comprehensive schedule of planning obligations and planning conditions, the predicted impacts are acceptable and would comply with the relevant planning policies.

Residential Quality of Proposed Development

- 6.5.26 There are no specific adopted space standards for this type of housing product within the development plan. Policy H18 of the draft London Plan (showing minor suggested changes) states that the private units within large-scale purpose-built shared living development should provide adequate functional layout, and are not self-contained homes or capable of being used as self-contained homes.
- 6.5.27 The proposed entrance would be visible from the public realm and clearly defined and would help activate the new public realm within the development. A concierge service would be provided and the two residential cores would be serviced by two lifts each. The internal corridors would be served by narrow windows and so would not be wholly reliant on artificial light and ventilation.
- 6.5.28 As noted above, there are no minimum space standard for this type of housing product. However, as each unit would be single occupancy, officers' consider that it would be reasonable to consider the minimum bedroom size of 7.5m², which would meet the requirement for a single bedroom as set out in the National Technical Housing Standards.
- 6.5.29 The proposed co-living units would vary in size from between 14m² and 24m². The mix of unity types within the development and typical floor layouts for the units, which were provided in the submitted design and access statement, is reproduced below;



Figure 1: Indicative layout

- 6.5.30 As demonstrated above, the proposed units would have a functional layout. Amenity space for the future occupiers would be provided by way of roof terrace/gardens located on the fifth and eighth floors and internal socialising spaces (lounge, screening room, events/games room) on the eighth floor.
- 6.5.31 The proposed units would largely be single aspect. However, given the proposed single occupancy level in conjunction with the amenity space provided, officers consider that this would be acceptable and would provide a satisfactory degree of outlook for the future occupiers. The proposed units on the west facing elevation would be sited between 5.3m to 6.3m away from the shared boundary and approximately 10m to 16m from the proposed flank wall of 'Building C' of the approved scheme for that adjacent.
- 6.5.32 A total of 12 units located on the northern end of the west-facing elevation (on floors one to four) would be sited 10m away from the east facing elevation of 'Building C'. While this distance would result in a degree of visibility between the two buildings, overall, and on balance with other residential quality considerations, it is considered that the proposal would secure a standard of visual privacy for future occupiers that is commensurate with the intended high density context, urban character setting/relationship of the proposed development and the location
- 6.5.33 A daylight and sunlight report has been included as part of the submission documents. An internal daylight amenity study has been undertaken to establish the quality of daylight within the proposed habitable rooms in accordance with the British Standard. The results of the study indicate that the 25 rooms considered will enjoy ADF values ranging between 1.5% and 6.2% and therefore satisfy a 1.5% minimum. Given the site constraints, it would be difficult for all of the units to enjoy direct sunlight. The specialist consultants have concluded that good daylight and sunlight levels would be achieved and that they should be considered acceptable.

6.5.34 Overall, officers consider that the internal design quality of the proposed development is of an acceptable standard and will ensure a good standard of living environment for future residents.

Accessibility and Inclusive Design

6.5.35 Chapter 12 of the NPPF states that 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.

6.5.36 London Plan Policy 7.2 and the Mayor's Accessible London: Achieving an inclusive environment SPG require that all development meets the highest standards of inclusive design and access for disabled people, and that the design process has considered how everyone will be able to use the places and spaces that are proposed.

6.5.37 The proposed scheme would provide 222 co-living units out of which 23 would be designed as wheelchair accessible. This would equate to approximately 10% which would accord with London Plan Policy. There would be inclusive access across the site and five disabled parking spaces would be provided.

6.5.38 Officers are satisfied that the proposals meet the development plan objectives in terms of accessibility and inclusive design and would contribute to the creation of a 'lifetime neighbourhood'.

6.6 Transport and Parking

6.6.1 The NPPF emphasises the role that transport policies play in achieving sustainable development and achieving wider sustainability and public health objectives. The NPPF specifically stipulates that people should be given a real choice about how they choose to travel. New development should be located and designed to prioritise sustainable transport modes such as walking and cycling, with access to high quality public transport facilities, create safe and secure layouts that minimises conflicts between traffic and cyclists or pedestrians and considers the needs of people with disabilities. Parking levels should take account of the accessibility of the development, the type, mix and use of development, the availability of and opportunities for public transport, local car ownership levels and an overall need to reduce the use of high-emission vehicles.

6.6.2 London Plan Policy 6.3 Assessing Effects of Development on Transport Capacity requires the impact of proposals on transport capacity and the transport network to be assessed, and states that development should not adversely affect safety on the transport network. In addition to Transport Assessments and Travel Plans, the policy goes on to call for construction logistics plans and delivery & servicing plans to be secured. Policy 6.10 Walking seeks high quality pedestrian environments within development proposals. Local Plan Policy AAP 19 Transport, Parking and Access within the Heart of Harrow requires all major development to prioritise access by sustainable modes, with particular emphasis on the provision of safe and attractive walking routes to facilities and public transport

Access, Highways impact and Public Transport

- 6.6.3 Currently the site has one main access point which would be retained. The application site has a PTAL of 5. The two closest bust stops (the H9 and H10 route) are located on Palmerston Road stopping in close proximity to the application site. Several other bus route services are located on the High Street, some 200m away from the application site. Harrow and Wealdstone rail station is located approximately 300m south west of the site and is served by London Overground, London NW Railway Southern and London Underground (Bakerloo) services.
- 6.6.4 With regards to trip generation, the submitted Transport Assessment illustrates that there would be a net reduction in 9 two-way vehicle movements and an increase in 107 person movements in the morning peak hour. There would be a net reduction in 11 two-way vehicle movements and an increase in 62 two-way person movements in the evening peak hour. Over an average day, it is estimated that there would be a net reduction in 30 two-way vehicle trips and an increase in 871 two-way person trips.
- 6.6.5 TfL have requested that the submitted Transport Assessment should be supplemented with a survey of travel patterns from one of the other shared-living sites under the Collective's ownership to better understand the travel patterns and the potential impact on capacity issues for public transport. On the request of TfL, the applicant has agreed to undertake an additional survey which would enable the collection of peak hour and daily trips of the Old Oak Common site, which could be compared to the trip rates within the Transport Statement. The outcome of this would be included in an addendum report which will be reported to Members.

Car and Cycle Parking Provision

- 6.6.6 London Plan Policies 6.9 Cycling and 6.13 Parking give effect to the London Plan cycle and vehicle parking standards, including requirements for electric vehicle charging points (ECPs), parking for 'blue badge' holders and for cycle parking in particular to be secure, integrated and accessible. 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.
- 6.6.7 The proposed development would be car free, only providing 5 disabled parking bays. Due to the good public transport access, it is considered that this location is suitable for accommodating car-free developments. The Council's Highways Officer has advised that there are stringent parking controls in the vicinity of the proposal site therefore, it is considered that despite the minimal car trip generation predicted, there are unlikely to be many car trips associated with this development at all as there are few on-street parking opportunities nearby. Subject to a planning

obligation for the development being parking permit restricted, officers consider that the on-site car parking arrangement would be satisfactory.

- 6.6.8 With regards to cycle parking, the proposed development would provide 122 long stay spaces and 12 short stay spaces. This would comply with the requirements of the London Plan. The proposed cycle spaces would be provided within designated cycle stores located at the southern end of the site. Subject to a condition to maintain and retain the cycle spaces for cycle storage only, officers consider the proposal to be acceptable in this regard.

Walking and Cycling Access

- 6.6.9 Policy AAP19 requires all major development proposals to prioritise access by sustainable modes, with particular emphasis on the provision of safe and attractive walking routes to nearby facilities and to public transport.
- 6.6.10 The submitted design and access and planning statement identify that there is scope to provide a new pedestrian link from Byron Road in the East to Masons Avenue and the station beyond. As a result, some consideration has been given to the proposed landscaping and public realm in the context of the emerging local development context.
- 6.6.11 As the proposal would be car-free, the proposed development would generate a considerable increase in trips by sustainable modes requiring enhanced walking and cycling interventions. In accordance with Policy AAP19, TFL considers that the Council should consider the feasibility of this and pursue an improved connectivity opportunity. This position is supported by the Council's Highways department and would satisfy the wider objectives of the Opportunity Area. Officers acknowledge that the adjoining Origin Housing Scheme has been granted subject to completion of the S106. As such, it would therefore be reasonable to expect a forthcoming development on the adjoining site and the improved pedestrian and cycle connectivity could therefore be realised. Officers consider that safeguarding the new pedestrian and cycle link could be satisfactorily secured through the S106 agreement.
- 6.6.12 TFL have emphasised the need to enhance the on-road cycle infrastructure, as the scheme is likely to generate a significant demand for cycling. The current on-road cycle route infrastructure is old, substandard and neither as safe nor attractive as it could be. Officers agree with this assessment. The Council's Highways Officer has advised that there are already proposals for improvements to the cycling infrastructure on George Gange Way. As such, officers consider that the LPA CIL Charge would satisfactorily contribute towards funding the improved cycle infrastructure as promoted through the borough's local plan.

Delivery and Servicing

- 6.6.13 The submitted delivery and servicing plan states that all servicing and delivery associated with the proposed development would access the site via the existing access on Palmerston Road. A turning space is provided at the southern end of the access road to allow service and delivery vehicles to turn in a safe location,

away from the junction with Palmerston Road. It is forecasted that there would be a total of 28 one-way servicing and delivery weekday trips.

- 6.6.14 It is best practice to provide exclusively on-site servicing and the proposal would therefore be acceptable in this regard. The submitted vehicle swept paths confirm that the necessary vehicles can be accommodated without the loss of safety to users of the site or congestions/queuing on-street. In accordance with comments provided by TfL, the on-site servicing requirement in addition to a detailed servicing management plan would be secured by condition.

Travel Planning and Construction

- 6.6.15 Both TfL and the Highways Authority have expressed concerns on the quality of the Construction Logistics Management framework Plan supplied with the application. The Council therefore considers that a more detailed plan should be provided prior to construction and a condition is recommended to address this.
- 6.6.16 A Framework Travel Plan has been submitted with the application to minimise the number of car trips generated by a development while encouraging sustainable forms of travel. The submitted Framework Travel Plan sets out a package of measures that would be introduced in order to influence the way residents, employees and visitors travel to and from the site. In order to ensure robust monitoring and effective mitigation of associated transport impacts arising from the development, it is recommended that a final version of the Travel Plan with set monitoring periods and associated travel plan bond should be secured by section 106 obligations.

Transport Conclusions

- 6.6.17 The proposal for a high density co-living scheme in a highly accessible location accords with the London Plan policy of encouraging such development in locations that give rise to a pattern of development that minimises the need to travel by car. The quantum of proposed car parking is acceptable given the sustainable location and subject to a suitable framework of controls including a permit free agreement and measures to encourage sustainable travel including electric vehicle charging points, a travel plan and pedestrian and cycle permeability. The transport aspects of this proposal when considered with the conditions and obligations are considered to be in accordance with strategic and local transport policies. As such, officers consider that the proposed development complies with the relevant policies in this regard.

6.7 Flood Risk and Development

- 6.7.1 The application site is located within EA flood zone 2 (medium probability of flooding) and 3 (high probability of flooding). The Wealdstone Brook culvert is located in close proximity to the site at the rear. The Wealdstone Brook is a main river that flows through underground culverts from Harrow Weald, through Wealdstone and Kenton, and into the London Borough of Brent.

- 6.7.2 Paragraph 163 of the NPPF states that, when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere. London Plan Policy 5.12 Flood Risk Management requires development proposals to comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical guidance on flood risk over the lifetime of the development. It 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.
- 6.7.3 Core Strategy Policy CS1 U undertakes to manage development to achieve an overall reduction in flood risk and increased resilience to flood events. It includes a commitment to maintain the capacity of the functional floodplain within greenfield sites and seeks opportunities to re-instate the functional floodplain on previously developed sites.
- 6.7.4 Local Plan Policy AAP9 requires proposals on allocated and non-allocated sites requiring a Flood Risk Assessment to demonstrate that the development is designed and laid out to be resistant, resilient and safe from all sources of flooding and there is a net flood risk reduction.

Sequential Test

- 6.7.5 Paragraph 155 of the NPPF states that Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. The application site is located within Flood zone 3 and the proposed development would necessitate a sequential test in accordance with the NPPF.
- 6.7.6 The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. Paragraph 159 of the NPPF states that where it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may also be applied.
- 6.7.7 Local Plan Policy AAP9 states that with regard to the sequential test, 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 new homes, or contributes significantly to the regeneration of Wealdstone. With regard to the application of the exception test, a high priority will be accorded to the delivery of physical and social regeneration within Wealdstone district centre.
- 6.7.8 A sequential test has been submitted with the application. With regards to the scope of the sequential test, as the application site is located within the

Opportunity Area, the Harrow and Wealdstone Area Action Plan requires the area of search be confined to the Heart of Harrow. For the purposes of the sequential test, allocated sites within the Opportunity Area that are comparable in size and capacity to deliver a similar quantum of development to the application proposal have been identified.

6.7.9 The following allocated sites have been identified and assessed;

Identified Allocates sites within Opportunity Area	Commentary
Site 5(ii): Wealdstone infills – Former Sam Maguire Public House, 19 High Street	Planning permission for residential development was approved in February 2015. The site is not large enough to accommodate the proposed development
Site 5(iv): Former Public House, 72 High Street	The site has recently been redeveloped for residential and retail use so is no longer available
Site 6: 5-11 Palmerston Road	A planning application has been approved for a comprehensive residential led mixed use development (subject to S106). The site is therefore not available.
Site 6: 37-41 Palmerston Road	A planning application has been approved for a comprehensive residential led mixed use development (subject to S106). The site is therefore not available.
Site 12: Greenhill Way Car Park North	The site is not available due to planning consent being granted in September 2016 for 42 flats
Site 18: Harrow on the Hill Car Park West	Redevelopment of the site depends on the release of land from the station car park. The site is also too small. The site is therefore not available and too small for the proposed development.
Site 20: Harrow on the Hill Car	Redevelopment of the site depends on the release of land

Park East	from car park use. Redevelopment of the site for the proposed development would be contrary to policy. The site is therefore not suitable for the proposed development
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- 6.7.10 The results demonstrate that the identified sites have either been implemented, are subject to current planning applications, or are not available for a similar type of development in the immediate future. As a result and in accordance with the advice in the NPPF, it is concluded that there are no reasonable available sites of a comparable size or capacity with lower probability of flooding where it would be appropriate to accommodate the proposed development. In this regard, officers are satisfied that the sequential test is passed.
- 6.7.11 In accordance with the NPPF, as it is not possible for development to be located in alternative allocated sites within the Opportunity Area with a lower risk of flooding; the exception test would need to be applied. Paragraph 160 of the NPPF states that for the exception test to be passed it should be demonstrated that:
- a) The development would provide wider sustainability benefits to the community that outweigh the flood risk; and
 - b) The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- Furthermore, the Harrow and Wealdstone Area Action Plan affords a high priority to the physical and social regeneration of Wealdstone.
- 6.7.12 The application site is previously developed land located in a highly accessible location. As detailed more comprehensively in other sections of this report, the proposed development would deliver a wide range of planning benefits for the site and the surrounding area. The regeneration of the site would enable the delivery of modern, flexible and affordable workspace and increase the quantum of employment within the designated industrial and business use area. Furthermore, the proposal would provide 222 co-living units which would meet a defined housing need and a commercial unit for the benefit of the future occupiers and local residents. Additionally, the proposal would be of a high-quality design and would enhance the character of the locality, thereby contributing to the physical regeneration of Wealdstone. Additionally, the high quality public realm and the potential for future pedestrian and cycle links would advance the emerging local development context.
- 6.7.13 As detailed below, a site specific Flood Risk Assessment has been submitted and is considered to be acceptable by the Council's Drainage Department. A number of flood risk mitigation measures are proposed in addition to a sustainable urban drainage strategy and this would be secured by way of conditions. Consequently, Officers are satisfied that the proposal would be safe for its lifetime without increasing flood risk elsewhere.

- 6.7.14 The NPPF states that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and should only consider development appropriate in areas at risk of flooding where informed by a site specific flood risk assessment, the Sequential Test and if the required the Exception Test have been passed. The Sequential Test demonstrates that none of the identified sites are available or suitable for the proposed development. The Exception Test has also been applied and demonstrates that there are wider sustainability benefits arising from the scheme contributing to the physical and social regeneration of Wealdstone and that the proposed development would be safe for its lifetime and would not increase the risk elsewhere. Officers therefore consider that the requirements of the Sequential and Exception Tests are met.
- 6.7.15. In response to the distribution of the flood risk at the site and to mitigate the flood risk, the flood risk assessment (FRA) submitted with the application confirms that the ground floor levels are at least 600mm above the predicted level for the 1 in 100 flood level. The proposed surface water discharge would be to the existing culvert running through the south of the site and the discharge rate from the proposed development will be restricted to 5l/s which can be implemented without increasing the risk of blockages. The Council's Drainage Team has expressed satisfaction with the proposed flood risk and sustainable Drainage strategy, subject to appropriately worded conditions.
- 6.7.16 The proposed development lies in close proximity to the Wealdstone Brook (main river) currently in culvert. The Wealdstone Brook is currently designated under the Water Framework Directive (WFD) as a heavily modified waterbody and currently achieves 'moderate' ecological status. The Thames River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies.
- 6.7.17 Policy DM11 of the Harrow Development Management Policies states that applications for major development on sites containing a main river within the site boundary will be required to have regard to the relevant provisions of the Thames River Basin Management Plan and secure the implementation of a scheme for restoring culverted sections of river. Where on-site enhancements or deculverting are financially viable but not feasible, the Council will seek a financial contribution towards relevant other projects for the enhancement or deculverting of other sections of the river or watercourse.
- 6.7.18 The application was referred to the Environment Agency who accept that due to the constraints on this particular site, de-culverting would not be practical or provide much benefit. A financial contribution to be secured in the s106 agreement is deemed to be a suitable compromise to compensate for the missed opportunity to de-culvert and for the associated loss of buffer zone adjacent to the watercourse. During the course of the application, a sum of £56,600 has been agreed between the applicant and the EA which is based on the cost of de-culverting the brook. The Environment Agency have reviewed the offer and the costing exercise and confirm that this would be acceptable. The s106 contribution would go towards achieving Water Framework Directive actions for the betterment of the Wealdstone Brook, such as de-culverting, bank softening and/or in-channel

restoration. Subject to securing the financial contributions in the s106, the Environment Agency would not object to the proposal.

- 6.7.19 The land following the corridor of the Wealdstone Brook culvert is in Flood Zone 3B (the functional floodplain) this is defined as land where water has to flow or be stored in times of flood. The Environment Agency normally expects any development to be set back from a main river by 8 metres. However, given the site constraints and practical barriers to de-culverting, the Environment Agency have agreed that the main building/permanent structures would be set back by at least 5 metres from the main river. It has also been agreed that non-permanent structures could be placed over the culvert provided it is demonstrated there is no additional loading on the culvert and the access points will be maintained so that the culvert can be maintained and inspected as necessary. A planning condition has been included to check the structural integrity and condition of the culverted Wealdstone brook within six months of completion of the development.

6.8 Sustainability, the Environment and Ecological Considerations

- 6.8.1 Chapter 14 of the NPPF states that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.
- 6.8.2 London Plan climate change policies, set out in Chapter five, collectively require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions. London Plan Policy 5.2 sets out an energy hierarchy for assessing applications as set out in more detailed below. London Plan Policy 5.3 ensures future developments meet the highest standards of sustainable design and construction, and London Plan Policies 5.9-5.15 promote and support the most effective climate change adaptation measures including passive thermal regulation, urban greening, and water management. London Plan Policy 7.19 seeks to ensure that wherever possible, development proposals make a positive contribution to the protection, enhancement, creation and management of biodiversity.
- 6.8.3 Policy CS1U of Harrow Council's Core Strategy and the Area Action Plan complement London Plan policies by establishing requirements for sustainable design and construction techniques that maximise the energy efficiency of new buildings, minimise the use of mains water, minimise carbon dioxide emissions and seek to promote and secure opportunities for decentralised energy, especially in the Harrow and Wealdstone Opportunity Area, on-site renewable energy generation, and urban greening. The policy also requires development to achieve an overall reduction in flood risk and increase resilience to flood events. The Development Management Policies DPD set out requirements for sustainable urban drainage, rainwater harvesting, flood risk assessments and surface water management. Local Plan Policy DM13 supports decentralised energy systems.

Carbon Dioxide Emissions Reduction

- 6.8.4 Paragraph 150 of the NPPF states that new developments should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design.
- 6.8.5 Policy 5.2 of the London Plan states that development proposal should make the fullest contribution to minimising carbon dioxide emissions and applies the following hierarchy; Be lean: use less energy, Be clean: supply energy efficiently, Be green: use renewable energy. The policy goes on to set out carbon dioxide reduction targets for residential and non-residential development, and requires detailed energy assessments to be submitted with applications for major development
- 6.8.6 The London Plan carbon dioxide reduction target during the period 2016 – 2019 is to achieve a reduction in carbon dioxide emissions against the 2013 building regulations requirements.
The submitted energy strategy states that the primary design aim is to reduce energy requirements through energy efficiency measures and good practice sustainable building services. Measures would include building fabric enhancements, high efficiency boilers for heating, insulated services distribution, mechanical ventilation heat recovery units, automatic control lighting, water saving techniques and a building energy management system to monitor, control and sequence key mechanical and electrical plant. It is anticipated that the proposed energy strategy attributes CO₂ savings of 9.8% from these measures to reduce the energy demand on the site. The energy strategy attributes potential savings of 24.8% from the inclusion of a gas Combined Heat and Power network. Renewable energies include solar photovoltaic panel and air source heat pumps which could potentially achieve a further 1.9% reduction in predicted Co₂

Sustainable Design and Construction

- 6.8.7 London Plan Policy 5.3 Sustainable Design and Construction requires development proposals to meet the minimum standards outlined in the Mayor's SPG and sets out the principles for sustainable design and construction. Local Plan Policy DM12 Sustainable Design and Layout sets out Harrow's local requirements.
- 6.8.8 As noted above, the proposed development would minimise carbon dioxide emissions across the site. London Plan Policy 5.9 Overheating and Cooling provides further detail on this point, requiring development proposals to follow a cooling hierarchy (to avoid overheating and reliance on air conditioning systems) and requiring major development to demonstrate how the proposal would minimise overheating and meet its cooling needs. The importance of passive measures and insulating building materials are emphasised in Local Plan Policy DM12 and the Mayor's SPG.
- 6.8.9 An overheating Assessment report has been submitted with the application. The results of the analysis demonstrate compliance with TM52 under current weather

data. This has been achieved through the adoption of a high performance solar control to the south east and south west facing facades, as well as by providing additional natural ventilation openings in addition to the mechanical ventilation provision to occupied areas.

- 6.8.10 The submitted Construction Logistics Plan states that suitable measures would be in place to suppress the dust and dirt generation from the site during construction. Additionally, an appointed party would remove all material from the site to waste recycling stations where possible.

District Heat Network

- 6.8.11 The Harrow and Wealdstone Opportunity Area has been identified as potentially suitable for a district energy network, given the scale of development envisaged in the area. This is reflected in the Harrow and Wealdstone Area Action Plan (Policy AAP10: Harrow and Wealdstone District Energy Network) and the draft London Plan 2017 (as a 'Heat Network Priority Area' under Policy S13 Energy Infrastructure). Both the AAP and the current / draft London Plan require major development to connect to a district energy network should one be available, or be designed so as to be capable of being connected to a future network should one be established.
- 6.8.12 Harrow Council has progressed a potential district energy network in Wealdstone through the energy master planning and feasibility stages of the Government's Heat Network Delivery Unit's network planning process. These studies have identified that an energy network serving the major Council-led regeneration projects in Wealdstone and the Origin Housing Scheme could be both technically and financially feasible.
- 6.8.13 In the supporting energy statement, the applicant states that the building services system would be designed such that connections will be achievable for future district heating schemes. A planning obligation will be secured through the S106 agreement to require that an agreed route for infrastructure be safeguarded to ensure that it would be technically feasible to extend the proposed site wide heat network to enable a connection to any future district-wide decentralised energy network in close proximity.

Air Quality

- 6.8.14 London Plan Policy 7.14 requires development to minimise exposure to existing poor air quality, reduce construction emissions and be air quality neutral. The Mayor's Sustainable Design and Construction and Control of Dust and Emissions During Demolition and Construction SPGs provide further guidance in relation to air quality issues. The entire borough of Harrow is designated as an Air Quality Management Area (AQMA) for nitrogen oxide (No2) and particulates (PM10).

6.8.15 An Air Quality Assessment, which considers the air quality implications of the proposal has been provided as part of the application's submission. The assessment concludes that following the successful implementation of mitigation measures which are to be incorporated within the proposal, the residual effects of construction dust and emissions from construction plant/vehicles upon the local area would be temporary and considered insignificant.

Noise

6.8.16 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 can be summarised as avoiding adverse noise impacts on health and quality of life as a result of new development; mitigating and minimising potential adverse noise impacts upon new development; improving the acoustic environment; separating new noise sensitive development from major noise sources or, where separation is not possible, apply good acoustic design principles; and to promote new technologies/improved practices to reduce noise at source. This reflects the approach espoused at paragraph 123 of the NPPF and associated guidance. Local Plan Policy DM 1 requires a high standard of amenity taking into account, inter alia, noise, hours of operation, and vibration.

6.8.17 A noise report has been submitted in support of the application and states that detailed noise monitoring has been undertaken to determine the existing environmental noise climate at the site. The noised levels are dominated by existing road traffic noise from surrounding streets, with some contribution from neighbouring commercial and industrial uses.

6.8.18 The assessment confirms that the noise intrusion can be adequately controlled using appropriately specified external wall construction, windows with acoustic double glazed units and openable windows. The noise levels experienced on the proposed roof terraces are satisfactory and no further mitigation is required in this regard. The report concludes that the proposed development should not raise any residual significant or other adverse impacts on the health and/or quality of life for existing residential and commercial neighbours of the site arising from noise.

6.8.19 The application has been referred to the Councils Environmental Health team who note the contents of the submitted noise report. On the basis of the information that has been submitted, the Environmental Health team have suggested a number of planning conditions to address noise impacts. These suggested conditions have been incorporated into the above appraisal.

Contaminated Land

6.8.20 The NPPF recognises that there is a role for 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.

- 6.8.21 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.
- 6.8.22 A Geo-Environmental Assessment has been submitted with the application and includes recommendations to ensure that any identified contamination risks are removed. The report was referred to the Council's Environmental Health department who have reviewed the submitted information and consider it to be satisfactory subject to conditions.

Waste

- 6.8.23 Local Plan Policy DM45 requires proposal to make waste management provision on site and to: provide satisfactory storage volume; ensure satisfactory access for collectors and collection vehicles; and be located to avoid nuisance to occupiers and adverse visual impacts. Detailed local design guidance is set out in the Council's Code of Practice for the Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (2016). The Code of Practice states that for flats, communal and high rise development, a two-bin system is recommended.
- 6.8.24 The application proposes residential and commercial waste storage at surface level with residents accessing the bin stores within the building and a dedicated secure refuse store at the southern end of the site. Refuse collection would take place within the site on a weekly basis. The Council's Waste Management Team has raised no objection to the proposal. Notwithstanding this, officers consider that the proposed integral store adjacent to the western boundary of the site could have the potential to cause undue nuisance and odour for the future occupiers of the adjacent ground floor units of the 'Origin Housing Scheme'. Officers consider that alternative arrangements / layouts could be provided to mitigate this identified harm which is to be resolved by way of condition.

Biodiversity

- 6.8.25 London Plan Policy 7.19 seeks to ensure that whatever possible, development proposals make a contribution to the protection, enhancement, creation and management of biodiversity. London Plan Policies 5.10 and 5.11 call for the provision of green infrastructure on site, including planting, green roofs and green walls. Local Plan Policy AAP 12 requires all major development proposals to incorporate features that support the protection, enhancement, creation and management of biodiversity within the Heart of Harrow.

6.8.26 An Ecological Appraisal has been submitted with the application. The report concludes that no residual ecological effects are predicted and that compensation is required to offset the small loss of vegetation required to implement the proposals. The Council's Biodiversity Officer has reviewed the report and has advised that there are no grounds on which to object to the proposal in relation to impacts on protects/priority species/features or the minor impact on biodiversity interest, provided that the scheme includes adequate provision for mitigation and enhancement in accordance with the above policies. However, there is scope to provide significant enhancements through bat/bird boxes, green roof treatment, green walls, soft landscaping of high wildlife value and measures to provide shelter and foraging for invertebrate species which can be secured by condition. Subject to compliance with the condition, officers consider that the proposal would be acceptable in this regard.

6.9 Affordable Housing

6.9.1 Policy 3.12 of the London Plan requires councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. At the local level, Overarching Policy CS1J of the Core Strategy (2012) sets a borough-wide affordable housing target of 40% of the housing numbers delivered from all sources of supply across the borough and calls for the maximum reasonable amount to be provided on development sites

6.9.2 The Housing SPG confirms that new large scale shared living housing should contribute the maximum reasonable amount of affordable housing it can, in line with London Plan policies 3.12 and 3.13, but does not set out how that affordable housing contribution should be provided

6.9.3 Policy H18 of the Draft London Plan (showing minor suggested changes) states that large-scale purpose-built shared living must deliver a cash in lieu contribution towards conventional C3 affordable housing. Boroughs should this this contribution for the provision of new C3 off-site affordable housing as either;

- a) Upfront cash in lieu payment to the local authority; or
- b) In perpetuity annual payment to the local authority

In both cases, developments are expected to provide a contribution that is equivalent to 35 percent of the units, to be provided at a discount of 50 percent of the market rent.

6.9.4 The applicant has submitted a Financial Viability Assessment to demonstrate how much affordable housing the scheme can deliver. The submitted information within the Financial Viability Assessment contains market sensitive information, and as such is unable to be assessed in a public forum. Notwithstanding this, the submitted information has been independently reviewed and tested to ensure that assumptions and with regard to affordable housing is the maximum reasonable affordable housing that can be made as part of the proposed scheme.

- 6.9.5 The independent review of the viability assessment has concluded that the assumptions are broadly accurate and that the scheme cannot support any affordable housing.
- 6.9.6 The Planning Obligations SPD (2013) seeks that for schemes that are below a policy compliant Affordable Housing offer, then a review mechanism ought to be applied. Whilst it is acknowledged that the proposed development is likely to be a single phased development, given the lifespan of the any permission (3 years), it is plausible that there could be a change in market circumstances prior to units being rented.
- 6.9.7 Officers therefore consider that an early stage review mechanism should be employed to ensure that in the event that the commencement of the development is delayed, a viability reappraisal can be undertaken to capture any improvement in market conditions that will allow provision for affordable housing contributions to be sought as part of the development. This approach is in line with Policy 3.12 of the London Plan. Officers also consider a late stage review would be appropriate so that the review can be based on values achieved and costs incurred and would accord with the guidance contained within the Mayor's Affordable Housing SPG (2017).
- 6.9.8 Officers are satisfied that the review mechanisms are required to ensure that the maximum reasonable level of affordable housing contribution is secured. The details of the review mechanism will be secured through a planning obligation in the S106 agreement
- 6.10 Planning Obligations
- 6.10.1 The NPPF states that "Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition".
- 6.10.2 Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) states that a Section 106 planning obligation may only constitute a reason for granting planning permission for the development if the obligation is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.
- 6.10.3 Policy DM50 'Planning Obligations' states that planning obligations will be sought on a scheme-by-scheme basis to secure the provision of affordable housing in relation to residential development schemes, and to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal. The Council's Planning Obligations and Affordable Housing Supplementary Planning Document (SPD) sets out the Council's approach, policies and procedures in respect of the use of planning obligations.

Harrow's Community Infrastructure Levy will ensure that new development helps to fund the cost of new and enhanced strategic infrastructure

- 6.10.4 Pursuant to the consideration within the previous sections of this report, and in line with the policy context set out above, Officers propose to secure a number of planning obligations required to appropriately mitigate the impact of the proposed development. A full list of the obligations proposed in this case is provided within the Heads of Terms of the legal agreement in the Officer recommendation section. Additional commentary is provided below to inform the proposed detailed drafting of a section 106 legal agreement;

Management Plan and Tenure

- 6.10.5 A planning obligation is sought for a tenure and management plan which details how the development would be managed and maintained to ensure the continued quality of the accommodation, communal facilities and services, and that it will positively integrate into the surrounding communities. Details would include; the length of the tenancy agreement (minimum 3 months), limiting the lease of a unit to one person, exceptions to persons permitted to occupy the development, concierge service details, security and fire safety procedures, move in and move out arrangements, how all internal and external areas of the development would be maintained, how communal spaces and private units would be clearing and how linen changing services would operate, how deliveries for servicing the development and residents' deliveries would be managed.

Affordable Housing Review Clauses

- 6.10.6 Early and Late review mechanisms to ensure that if there is an improvement in viability, this contributes to the delivery of affordable housing within the Borough

Employment and Training

- 6.10.7 In Accordance with Harrow's Planning Obligations SPD, a contribution from the development has been requested to fund local employment and training programmes to optimise the local economic benefits of the construction of the development. It is also requested that the applicant provides a training and recruitment plan and implements it using reasonable endeavours to secure the use of local suppliers and apprentices during the construction of the development.

Design

- 6.10.8 To ensure the delivery of a development with high quality design, a planning obligation is sought to require the developer to use reasonable endeavour to retain the existing architect (or one of equivalent standard) until the development is completed; or, for the applicant to submit a Design Code (for approval by the Council) prior to the commencement of the development that details the quality of the external materials of the finished development and other design parameters

Energy

- 6.10.9 A planning obligation is sought to require that an agreed route for infrastructure be safeguarded to ensure that it would be technically feasible to enable a connection to any future district-wide decentralised energy network in close proximity. The applicant will be required to use reasonable and commercially sensible endeavours to connect to this district wide network when it becomes available.

Transport

- 6.10.10 To ensure that no additional transport stress is placed on the public highway following the development, to support 'permit-free' development in areas with high levels of public transport accessibility, and to promote sustainable modes of transport, the section 106 will also secure;
- a resident/visitor permit restriction to exclude future occupiers of the development (except for disabled people) from applying for on-street parking permits.
 - A revised Travel Plan to be submitted to the Council prior to the first occupation of the building. A Travel Plan bond of £10,000 to secure the implementation of the measures set out in the revised travel plan, in addition to £5,000 monitoring fees to cover the cost of monitoring the travel plan.
 - New Pedestrian and Cycle route safeguarding whereby the developer will use all reasonable endeavours to activate the pedestrian and cycle route with the adjoining allocated site.

Enhancement of Wealdstone Brook

- 6.10.11 The proposed development is in close proximity to the Wealdstone Brook. A contribution of £56,600 is required to compensate for the lost opportunity to de-culvert the Wealdstone Brook (in line with Thames River Basin Management Plan objectives) and would go towards actions for the betterment of the Wealdstone Brook such as de-culverting, bank softening and/or in-channel restoration.

Other Requirements

- 6.10.11 The legal costs associated with the preparation of the planning obligation and the Council's administrative costs associated with monitoring compliance with the obligation terms will also be secured

7.0 CONCLUSION AND REASONS FOR APPROVAL

- 7.1 The proposed development would provide a residential-led mixed use development, including flexible office space and a café/restaurant. The proposal would make a more efficient use of a prominent and highly accessible, already developed site, in close proximity to Wealdstone town centre and Harrow and Wealdstone station. It would also contribute to delivering the objectives of the Harrow and Wealdstone Opportunity Area, by providing residential accommodation and higher employment densities supporting the regeneration agenda of the Borough. The financial viability position has been independently

verified and a review mechanism will be carried out and will secure off-site housing affordable housing contributions if viable.

- 7.2 The design of the proposal is of a high quality in respect to its response to the site and local context, in terms of height and massing; layout and ground floor uses; connections and permeability; architectural appearance and materials; and public realm. The development would optimise the potential of the site, whilst delivering a high quality public realm. Officers are satisfied that material considerations exist to justify a 'taller. The residential quality would be high given the general compliance with The London Plan and local policy standards and the quality of accommodation and services provided would be secured through legal obligations.
- 7.3 The proposal would preserve the significance of heritage assets located in the vicinity of the application site and their settings as well as the composition of the local protected views in which the development lies. The proposed development would greatly improve the accessibility of the built form and associated public realm for residents and visitors alike, by delivering an environment that is walkable with accessible commercial and office spaces. A range of wheelchair accessible units would also be provided. This inclusive environment would contribute to the principles of 'lifetime neighbourhoods'.
- 7.4 Given the urban context of the site, the application would not unacceptably impact upon the amenity of neighbouring occupiers in terms of: privacy/outlook; daylight, sunlight, overshadowing; noise and disturbance.
- 7.5 The proposed development would be of a high standard of sustainable design and construction, minimising carbon dioxide emissions by promoting passive design, using low carbon energy and including renewable energy in accordance with the energy hierarchy. The development would satisfy the Sequential and Exception Tests for a development in an area of high flood risk and it has been satisfactorily demonstrated that the proposal would not increase flood risk and would deliver sustainable urban drainage benefits over the existing situation at the site and deliver urban greening. The proposed development would also acceptably mitigate its own environmental impact in terms of air quality, land contamination and waste.
- 7.6 The proposal for a high density residential scheme in a highly accessible location accords with the London Plan policy of encouraging such development in locations that give rise to a pattern of development that minimises the need to travel by car. The car-free proposal is acceptable subject to a permit free agreement and measures to encourage sustainable travel through a travel plan. The transport aspects of this proposal when considered with the conditions and obligations are considered to be in accordance with strategic and local transport policies.
- 7.7 Appropriate, reasonable and necessary planning conditions and planning obligations are proposed to ensure that the development is acceptable in planning terms and the environmental impacts are managed. Accordingly there are no, or insufficient, grounds to withhold planning consent on the basis of the policies considered and other material planning considerations.
- 7.8 Officers conclude that the proposed development is worthy of support.

APPENDIX 1: Conditions and Informatives

Conditions

1. Timing

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

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

2. Approved Drawing and Documents

The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

PTCH-HBA-00-XX-DR-A-08-0000, PTCH-HBA-00-XX-DR-A-08-0100, PTCH-HBA-00-XX-DR-A-08-0101, PTCH-HBA-00-XX-DR-A-08-0120, PTCH-HBA-00-XX-DR-A-08-0200, PTCH-HBA-00-XX-DR-A-08-0201, PTCH-HBA-00-XX-DR-A-08-0202, PTCH-HBA-00-XX-DR-A-08-0203, PTCH-HBA-00-XX-DR-A-08-0250, PTCH-HBA-00-XX-DR-A-08-0251, PTCH-HBA-00-XX-DR-A-08-0252, PTCH-HBA-00-XX-DR-A-08-0253, PTCH-HBA-00-XX-DR-A-08-0300, PTCH-HBA-00-XX-DR-A-08-0350, PTCH-HBA-00-XX-DR-A-08-0351, PTCH-HBA-00-XX-DR-A-08-0352, PTCH-HBA-00-XX-DR-A-08-0371, PTCH-HBA-00-XX-DR-A-08-0500, PTCH-HBA-00-09-DR-A-08-0160, PTCH-HBA-00-XX-DR-A-08-0050, PTCH-HBA-00-XX-DR-A-08-0051, PTCH-HBA-00-B1-DR-A-08-0150, PTCH-HBA-00-00-DR-A-08-0151, PTCH-HBA-00-01-DR-A-08-0152, PTCH-HBA-00-02-DR-A-08-0153, PTCH-HBA-00-03-DR-A-08-0154, PTCH-HBA-00-04-DR-A-08-0155, PTCH-HBA-00-05-DR-A-08-0156, PTCH-HBA-00-06-DR-A-08-0157, PTCH-HBA-00-07-DR-A-08-0158, PTCH-HBA-00-08-DR-A-08-0159, PTCH-HBA-00-09-DR-A-08-0160, 1803-S3-001, 1803-S3-002, 1803-S3-010, 1803-S3-011, 1803-S3-012, 1803-S3-020, Design and Access Statement (May 2018), Daylight and Sunlight Report by EB7 (31st May 2018), Ecological Appraisal by J Taylor Ecology (version 3 dated 24th May 2018), Energy Strategy by Applied Energy (revision A dated 21.05.2018), Overheating Assessment Report by Applied Energy (dated 30.04.2018), Heritage, Townscape and Visual Impact Assessment by Montagu Evans (dated May 2018), Transport Assessment by RPS Group (dated 1 June 2018), Framework Travel Plan by RPS Group (dated 1 June 2018), Delivery and Servicing Plan by RPS Group (dated 1 June 2018), Construction Logistics Plan by RPS Group (dated 1 June 2018), Noise Assessment by M3 Mayer Brown (dated May 2018), Air Quality Assessment by M3 Mater Brown (Rev 2 dated May 2018), Technical Note – Foul Drainage by M3 Mayer Brown, Flood Risk Assessment by M3 Mayer Brown (5th Issue dated April 2018), Geo-Environmental Assessment by Merebrook (Rev A dated 26.04.18), Statement of Community Involvement by Kanda Consulting (dated May 2018), Sustainability Statement by Eight Associates (dated 16/05/2018), Utilities Statement by Applied Energy (dated 01.05.2018), Financial Viability Assessment by DS2 LLP (dated June 2018), Planning Statement by DP9 (dated June 2018),

Design and Access Statement Landscape by DK-CM (dated May 2018), Flood Risk Sequential Test by DP9 (dated September 2018).

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

Pre-Commencement Conditions

3. 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 of the development;
- d) the erection and maintenance of security hoardings including decorative displays and facilities for public viewing;
- e) wheel washing facilities; and
- 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.

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 Policies 7.14 and 7.15 of the London Plan (2016) and Policy DM1 of the Development Management Policies Local Plan (2013) 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 is a PRE-COMMENCEMENT condition to ensure that measures are agreed and in place to manage and reduce dust, noise and vibration during the demolition and construction phases of the development and manage transport impacts during the demolition and construction phases of the development.

4. Construction Management Strategy

No development shall take place, including any works of demolition, until a construction management strategy, to include details of cranes and other tall construction equipment (including obstacle lighting) has first been submitted to and agreed in writing by the Local Planning Authority. The construction of the development shall be carried out in accordance with the strategy so agreed.

REASON: To ensure that construction work and construction equipment associated with the development does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter and receiver systems, in accordance with Policy 7.7 of the London Plan (2016). This is a PRE-COMMENCEMENT condition to ensure that measures are agreed and in

place to avoid any obstruction to air traffic and to safeguard the integrity of air traffic operational systems during the demolition and construction phases of the development.

5. Site Levels

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, has first been submitted to and agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with the details so agreed.

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 policy DM1 of the Harrow Development Management Policies Local Plan (2013). This is a PRE-COMMENCEMENT condition to ensure that appropriate site levels are agreed before the superstructure commences on site.

6. Non-Road Mobile Machinery

The development hereby permitted shall not be commenced including works of demolition until details has first been submitted to and agreed 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 policy 7.14 of The London Plan 2016, policy DM1 of the Harrow Development Management Polices Local Plan (2013) and policy AAP 4 of the Harrow and Wealdstone Area Action Plan (2013). This is a PRE-COMMENCEMENT condition ensure that suitable vehicles would be used during the construction process

7. Inclusive Access Strategy

The development hereby approved shall not commence until an inclusive access strategy for the site has been submitted to, and agreed in writing by, the local planning authority. The strategy shall:

- a) demonstrate inclusive access within the proposed development including the commercial unit;
- b) detail the design of all gradients, ramps and steps within publicly accessible areas of the development; and
- c) detail the arrangements for disabled residents' access to the disabled parking spaces and the access, and use of, waste and recycling facilities within the development.

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

REASON: This is a PRE-COMMENCEMENT condition to ensure that the development contributes to the achievement of a lifetime neighbourhood, in accordance with Policies 3.8 and 7.1 of the London Plan, Core Strategy Policy CS1 and Policy DM 2 of the Development Management Policies Local Plan 2013

8. Surface Water Attenuation and Disposal

No development shall take place, other than works of demolition until surface water attenuation and storage works and the disposal of surface water have been submitted to, and approved 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. The applicant should contact the Harrow Infrastructure Team at the earliest opportunity.

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 Policies 5.13 and 5.15 of the London Plan (2016) and Policy AAP 9 of the Harrow and Wealdstone Area Action Plan (2013). This is a PRE-COMMENCEMENT condition to ensure that measures are agreed and built-in to the development to manage and reduce surface water run-off

9. Flood Mitigation Measures

No development shall take place, other than works of demolition until Flood Mitigation Measures have been submitted to and approved in writing by the Local Planning Authority. To ensure that the structure is designed to mitigate the effects of any possible flooding on site or elsewhere and include resistance and resilience to flooding. The applicant should provide detailed description of building materials, foundations, floor, wall, fittings, services, doors and windows that minimise water entry whilst maintaining structural integrity, materials and construction techniques that facilitate drying and cleaning, in line with 'Improving the Flood Performance of New Buildings' publication taking into account the expected depth of flooding.

REASON: To build in resistance and resilience in managing, reducing and mitigating the effects of flood risk following guidance in the National Planning Policy Framework, in accordance with Policies 5.12 of the London Plan (2016), Policy DM9 of the Harrow Development Management Policies and Policy AAP 9 of the Harrow and Wealdstone Area Action Plan (2013). This is a PRE-COMMENCEMENT condition to ensure that measures are agreed and built-in to the development to manage and reduce surface water run-off.

10. Drainage Maintenance

No development shall take place, other than works of demolition, until a drainage management and sustainable drainage system maintenance plan has first been submitted to and agreed in writing by the Local Planning Authority. The development shall be carried out and thereafter be managed and maintained in accordance with the plan so agreed.

REASON: To ensure that the development achieves an appropriate surface water run-off rate in this critical drainage area and to ensure that opportunities drainage measures that contribute to biodiversity and the efficient use of mains water are exploited, in accordance with Policies 5.13 and 5.15 of the London Plan (2016) and Policy AAP 9 of the Harrow and Wealdstone Area Action Plan Local Plan (2013). This is a PRE-COMMENCEMENT condition to ensure that such measures that are required to secure the future management and maintenance of the surface water drainage systems are agreed and built-in to the development.

Progression Point Conditions

11. Materials

Notwithstanding the details shown on the approved drawings, the development hereby approved shall not progress above podium slab level until:

- a) details and samples of the materials to be used in the external surfaces of the buildings (facing materials for the buildings, windows/ doors/ winter gardens/ curtain walling, balconies including privacy screens and balustrades, entrance canopies), hard surfaces, roofs and any means of enclosure;
- b) drawings to a 1:20 metric scale to show typical details of the elevations from all sides and the slab thickness of roof parapets;

has first been submitted to and agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with the details, samples and drawings so agreed and shall be retained as such thereafter.

REASON: To ensure that the development is carried out to the highest standards of architecture and materials in accordance with Policies 7.6 and 7.7 of the London Plan and Policies DM1 of the Harrow Development Management Policies and AAP4 of the Area Action Plan

12. Windows and Door Reveals

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

REASON: To ensure a high quality finish to the external elevations of the building, in accordance with policies 7.4 and 7.7 of The London Plan 2016, policy DM1 of The Development Management Policies Local Plan 2013 and policies AAP4 and AAP6 of the Harrow and Wealdstone Area Action Plan 2013.

13. Landscaping

Notwithstanding the details shown on the approved plans, the development hereby approved shall not progress beyond podium slab level until a scheme for the hard and soft landscaping of the development, to include details of the planting, hard surfacing materials, has 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. The scheme shall also include details of the boundary treatment, green walls/trellis, tree planting, underground urban soil structural support and extent and fixing details including the details for the proposed semi mature trees (at time of planting), details of minor artefacts and structures, details of proposed irrigation or proposed watering system in place for regular watering in dry / drought conditions for the landscaped areas including the roof terraces. The development shall be carried out in accordance with the approved scheme or any amendment or variation to it as may be agreed in writing by the local planning authority, and maintained in accordance with the approved scheme.

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes to the creation of a high quality, accessible, safe and attractive public realm and to ensure a high standard of design, layout and amenity in accordance with policy 7.4B of The London Plan, policies DM1 and DM22 of the Harrow Development Management Policies and policies, AAP4, AAP 7 and AAP 12 of the Harrow and Wealdstone Area Action Plan Local Plan

14. Revised Refuse Storage Details

Notwithstanding the details shown on the approved drawings, the development hereby approved shall not progress beyond podium slab level until revised details for the integral refuse storage has first been submitted to and agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure the proposed development safeguards the residential amenities of adjoining occupiers in accordance with Policy DM1 of the Harrow Development Management Policies and Policy AAP4 of the Harrow and Wealdstone Area Action Plan.

15. Lighting Strategy

The development hereby approved shall not progress beyond podium slab level until details of the lighting of all public realm and other external areas (including buildings) within the site has first been submitted to and agreed in writing by the Local Planning Authority. The details shall include details of the intensity of light emissions (including the surface area to be illuminated), detailed drawings of the proposed lighting columns and fittings and any measures for mitigating the effects of light pollution. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development incorporates lighting that contributes to Secured by Design principles, achieves a high standard of residential quality in accordance with Policy AAP 4 of the Harrow and Wealdstone Area Action Plan (2013) and to ensure that the development does not unduly impact on adjacent highways in accordance with policies DM1 and DM19 of the Harrow and Wealdstone Area Action Plan 2013.

16. Biodiversity Enhancement

The development hereby permitted shall not commence above podium slab level until full details of biological enhancements for the site have been submitted to, and agreed in writing by, the local planning authority. The enhancements shall include;

- a) the type and location of bat and bird boxes to be built into the structure
- b) full details of the proposed green roof treatment, including roof build up, plant species mix(es) which should include twenty plus native flower species offering pollen and nectar from early spring to late autumn, together with an assessment of the sustainability of the roof to ensure adequate water provision/retention
- c) Full details of the location, extent, support, and target height and thickness of the indicated green walls, with information about the species mix which should include 50% natives and other species in order to provide dense shelter (including for nesting birds), pollen and nectar between spring and late autumn

- d) Full details of measures to be taken to provide shelter and foraging for invertebrate species at ground level, in the external building walls, and within the green walls and green roof areas.

REASON: To enhance the ecology and biodiversity of the area in accordance with Policies 5.10, 5.11 and 7.19 of the London Plan, Policy DM21 of the Harrow Development Management Policies and Policy AAP12 of the Harrow and Wealdstone Area Action Plan

17. Sound Insulation Scheme

Unless otherwise agreed in writing by the Local Planning Authority, the development shall not commence above podium slab level until a sound insulation scheme for protecting the proposed residential units (including balconies and podium level & rooftop outdoor amenity areas) from rail, commercial and other noise (including vibration) shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the approved mitigation measures shall be fully implemented in accordance with the approved details and shall be retained and maintained in good working order for so long as the buildings remains in use. The use of BS 6472: 2008 Guide to the Evaluation of human Exposure to Vibration in Buildings & British Standard 8233:2014 Sound Insulation and Noise Reduction for Buildings – Code of Practice is recommended.

REASON: To ensure that measures are put in place to manage and reduce noise and to safeguard the amenity of neighbouring occupiers, in accordance with Policy 7.14 of the London Plan (2016) and Policy DM1 of the Development Management Policies Local Plan (2013)

Pre Occupation Conditions

18. Landscape management and maintenance

The development hereby approved shall not be occupied until a scheme for the on-going management and maintenance of the soft landscaping within the development, to include a landscape management plan, including long term design objectives, management responsibilities and maintenance schedules for a minimum period of 5 years for all landscape areas, and details of irrigation arrangements and planters, has first been submitted to 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 Policy DM1 of the Development Management Policies Local Plan 2013 and policies, AAP4, AAP 7 and AAP 12 of the Harrow and Wealdstone Area Action Plan Local Plan

19. Landscape implementation

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

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes (i) to the creation of a high quality, accessible, safe and attractive public realm and (ii) to the enhancement, creation and management of biodiversity with the Heart of Harrow, in accordance with Policy DM1 of the Development Management Policies Local Plan 2013 and policies, AAP 4, AAP7 and AAP 12 of the Harrow and Wealdstone Area Action Plan

20. Public realm

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

REASON: To ensure that the development is managed and maintained to create a high quality, accessible, safe and attractive public realm throughout the lifetime of the development, and to ensure that there are adequate arrangements in place for appropriate events and functions to take place within the public realm, in accordance with Policy AAP7 of the Harrow and Wealdstone Area Action Plan

21. Communal facilities for television reception

Prior to the first occupation of the development, details of a strategy for the provision of communal facilities for television reception (eg. aerials, dishes and other such equipment) shall be submitted to and agreed in writing by the Local Planning Authority. Such details shall include the specific size and location of all equipment. The approved details shall be implemented prior to the first occupation of the relevant phase and shall be retained thereafter. No other television reception equipment shall be introduced onto the walls or the roof of the building without the prior written approval of the Local Planning Authority.

REASON: To ensure that any telecommunications apparatus and other plant or equipment that is required on the exterior of the buildings preserves the high quality design of the buildings and spaces in accordance with Policy 7.4 of the London Plan (2016), Policy AAP 4 of the Harrow and Wealdstone Area Action

Plan (2013) and DM 49 of the Development Management Policies Local Plan (2013), and to ensure that the development achieves a high standard of amenity for future occupiers the buildings in accordance with Policy DM 1 of the Development Management Policies Local Plan (2013).

22. Building maintenance

The development hereby approved shall not be occupied until a strategy for maintaining the external surfaces of the buildings has first been submitted to and agreed in writing by the Local Planning Authority. The strategy shall include details of the regime for cleaning, repainting and repairing the buildings and the logistical arrangements for implementing that regime. Maintenance of the external surfaces of the buildings shall adhere to the strategy so agreed.

REASON: To ensure that maintenance of the development is carried out to preserve 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 Harrow and Wealdstone Area Action Plan 2013

23. Delivery and Servicing Plan

The development hereby approved shall not be first occupied until a revised Delivery and Servicing Plan has first been submitted to and agreed in writing by the Local Planning Authority. The revised Delivery and Servicing Plan shall include full details of the onsite Refuse Management Strategy. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter. All deliveries and servicing associated with the development shall be carried out only in accordance with the approved details.

REASON: To ensure that the transport network impact of deliveries associated with non-residential uses within the development are managed; the development achieves a high standard of residential quality for future occupiers of the development and provides a high quality, safe and attractive public realm in accordance with Policy 6.3 of the London Plan (2016), Policy AAP 4 of the Harrow and Wealdstone Area Action Plan 2013 and policy DM 1 of the Development Management Policies Local Plan 2013.

24. Foul Water Disposal

The development hereby permitted shall not be occupied until works for the disposal of sewage have been provided on site in accordance with details to be submitted to, and approved in writing by, the local planning authority. The works shall thereafter be retained to ensure that the necessary construction and design criteria for the development proposals follow approved conditions. The applicant should contact Thames Water Utilities Limited and the Harrow Infrastructure Team at the earliest opportunity.

REASON: To ensure that adequate drainage facilities are provided in accordance with Sewers for Adoption and 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 Harrow and Wealdstone Area Action Plan (2013).

25. Crime Prevention Measures

The development hereby approved shall not be occupied until evidence of certification of Secure by Design Accreditation for the development has first been submitted to, and approved in writing by the Local Planning Authority

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 Harrow and Wealdstone Area Action Plan 2013, and Section 17 of the Crime & Disorder Act 1998.

26. Roof Terrace Screening

The development hereby approved shall not be occupied until details for the proposed terrace screens have been submitted to and approved in writing by the Local Planning Authority. The approved details/screens shall be installed on site before the occupation of the residential units and shall be maintained thereafter.

REASON: To ensure that the development preserves the highest standards of residential amenity in accordance with Policy 7.6 of the London Plan (2016), Policy DM 1 of the Development Management Policies Local Plan 2013 and Policies AAP4 of the Area Action Plan.

Post Completion Condition

27. Wealdstone Brook Culvert

Within six months of the completion of the development hereby permitted, a CCTV survey to check the structural integrity and condition of the culverted Wealdstone Brook will be submitted to, and approved in writing by, the local planning authority. If any defects/weaknesses are identified, remedial proposals shall be submitted to and approved by the local authority, and appropriate action taken to remedy the defects identified in line with the approved remedial proposals.

REASON: To ensure the structural integrity of the existing Wealdstone Brook culverted main river is unaffected by the completed development thereby reducing the risk of flooding to the proposed development and future users, in accordance with Policies 7.24 – 7.28 of The London Plan, Policy DM11 of the Harrow Development Management Policies and Policy AAP9 of the Harrow and Wealdstone Area Action Plan.

Compliance Conditions

28. Appearance of the buildings

Other than those shown on the approved drawings, no soil stacks, soil vent pipes, flues, ductwork or any other pipework shall be fixed to the elevations of the building hereby approved.

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), Policy CS1B of the Harrow Core Strategy (2012) and Policies AAP4 and AAP6 of the Harrow and Wealdstone Area Action Plan 2013.

29. Refuse storage

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

REASON: To safeguard the appearance and character of the surrounding area, in accordance with policy 7.4 of The London Plan 2016 and ensure a high standard of residential quality in accordance with Policy AAP 4 of the Harrow and Wealdstone Area Action Plan (2013)

30. Communications 1

Notwithstanding the provisions of Part 16 (Communications) to Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015, or any order revoking and replacing that Order with or without modification, no development that would otherwise be permitted by that part of the Order (or the equivalent provisions of any replacement Order) shall be carried out without planning permission having first been obtained by the local planning authority.

REASON: To ensure that the development preserves 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 Harrow and Wealdstone Area Action Plan (2013)

31. Communications 2

Notwithstanding the provisions of the Electronic Communications Code Regulation 5 (2003) in accordance with The Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking or re-enacting that order with or without modification), no development which would otherwise fall within Schedule 2, Part 16, Class A of that order shall be carried out in relation to the development hereby permitted without the prior written permission of the local planning authority.

REASON: In order to prevent the proliferation of individual telecommunication items on the building which would be harmful to the character and appearance of

the building and the visual amenity of the area, in accordance with Policies 7.6 and 7.7 of the London Plan (2016) and Policies AAP 4 and AAP 6 of the Harrow and Wealdstone Area Action Plan (2013).

32. Window glass

The window glass of the café/restaurant use hereby approved shall not be painted or otherwise obscured without the prior written permission from the Local Planning Authority.

REASON: To ensure that active shopfronts are maintained in the interests of providing high quality, safe and attractive public realm, in accordance with policy AAP7 of the Harrow and Wealdstone Area Action Plan Local Plan 2013.

33. Contamination

If, during development, contamination not previously identified is found to be present at the site then no further construction of that phase of the development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unanticipated contamination is to be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

REASON: To ensure that the development does not activate or spread potential contamination at the site and that the land is appropriately remediated for the approved uses, in accordance with Policy 5.21 of the London Plan and Policy DM 15 of the Harrow and Wealdstone Area Action Plan

34. Noise Levels

Unless otherwise agreed in writing by the Local Planning Authority, the individual and cumulative rating level of noise emitted from plant and/or machinery at the development hereby approved shall be at least 10dB below the existing background noise level. The noise levels shall be determined at the nearest residential property. The measurements and assessment shall be made in accordance with British Standard 4142 Method for rating industrial noise affecting mixed residential and industrial areas.

REASON: To ensure that the development achieves a high standard of amenity for future occupiers of this and the neighbouring buildings, in accordance with Policy 7.6 of the London Plan (2016) and Policy DM 1 of the Development Management Policies Local Plan 2013

35. Air Extraction system

No air extraction system shall be used on the premises until a scheme for the control of noise, fumes and odours emanating from the site has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall then be fully implemented before the development is occupied/the use commences and thereafter shall be retained and maintained in good working order for so long as the building remains in use.

REASON: To ensure that the development achieves a high standard of amenity for future occupiers of this and the neighbouring buildings, in accordance with Policy 7.6 of the London Plan (2016) and Policy DM 1 of the Development Management Policies Local Plan 2013

36. Non-residential opening hours

Unless otherwise agreed in writing by the local planning authority, the café/restaurant hereby approved shall only be open to the public between: 7:00am and 22:00pm on Mondays to Saturdays and between the hours of 10:00am and 18:00pm on Sundays and Bank Holidays, unless otherwise agreed in writing by the local planning authority.

REASON: To ensure that the operation of the ground floor use is compatible with residential amenity, in accordance with Policy AAP 18 of the Harrow and Wealdstone Area Action Plan (2013) and policies DM 1 and DM 41 of the Development Management Policies 2013.

37. Non-residential Delivery Hours

Deliveries to any non-residential uses within the development shall take place only between the hours of 07:30 and 19:00 on Mondays to Fridays and between the hours of 08:30 and 13:00 on Saturdays. There shall be no deliveries on Sundays and Bank Holidays

REASON: To ensure that the noise impact of deliveries associated with non-residential uses within the development is minimised and that the development achieves a high standard of amenity for future and the neighbouring occupiers, in accordance with Policy 7.15 of the London Plan (2016) and Policy DM 1 of the Development Management Policies 2013.

38. Wheelchair units

A minimum of 10% of the co-living units shall be 'Wheelchair Accessible' unless otherwise agreed in writing by the local planning authority.

REASON : To ensure provision of 'Wheelchair and Accessible and adaptable' housing in accordance with policies 3.8 and 7.2 of The London Plan (2016) and Policy AAP 4 of the Harrow and Wealdstone Area Action Plan (2013)

1 Informatives

Policies

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

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

Draft London Plan: GG1, GG2, GG3, GG4, SD1, D2, D3, D4, D5, D7, D13, H18, HC1, HC4, G5, G6, SI1, SI2, SI3, SI4, SI5, SI12, SI13, SI17, T1, T3, T4, T5, T6, DF1

Harrow Local Plan:

Core Strategy: CS1, CS2;

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

Development Management Policies: DM 1, DM 2, DM 3, DM 6, DM 7, DM 10, DM11, DM 12, DM 14, DM 15, DM 21, DM 22, DM 42, DM 43, DM 44, DM 45, DM 49, DM 50,

Mayor of London Guidance

- Accessible London: Achieving an Inclusive Environment
- Sustainable Design and Construction
- London View Management Framework SPG
- Housing SPG

LB Harrow Guidance

- Council's Code of Practice for the Storage and Collection of Refuse and Materials for
- Planning Obligations & Affordable Housing SPD (October 2013)

1. Pre-application engagement

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

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

2. Environment Agency

Under the terms of the Water Resources Act 1991 and 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 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.

3. Flank windows

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

5. 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. The Party Wall etc. Act 1996

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

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

and that work falls within the scope of the Act. Procedures under this Act are quite separate from the need for planning permission or building regulations approval.

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

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/133214.pdf>
Tel: 0870 1226 236, Fax: 0870 1226 237, Textphone: 0870 1207 405, E-mail: Ucommunities@twoten.comU4T

7. Resident's parking permits

The relevant traffic order will impose a restriction making residential occupiers of this building ineligible for resident's parking permits in the surrounding controlled parking zone.

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

- a. 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.
- b. Carrying out works in breach of such a condition will not satisfy the requirement to commence the development within the time permitted.

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

9. Crime prevention

In aiming to satisfy the Community Safety condition(s) the applicant should seek the advice of the Borough Crime Prevention Design Advisors (CPDA). They can be contacted through the Crime Reduction Unit, Harrow Police Station, 74 Northolt Road, Harrow, Middlesex, HA2 ODN, tel. 020 8733 3465. It is the policy of the local planning authority to consult with the Borough CPDA in the discharging of this / these condition(s).

10. Main River Buffer Zone

The proposals include development in close proximity to Wealdstone Brook, which is designated 'Main River'. This will prejudice flood defence interests and adversely affect the character of the watercourse, and restrict necessary access to the watercourse for the Environment Agency to carry out its maintenance and inspection functions as Land Drainage Authority (Note to Local Planning Authority: Under the Water Resources Act 1991 and the Land Drainage Byelaws 1981, the prior written consent of the Environment Agency is required for any works in, over, under or within 8 meters of a main river, or structure, irrespective of any planning permission granted. It is likely that such consent will be withheld in this case). The applicant should contact the Environment Agency at the earliest opportunity.

REASON: To protect Main River Corridors and reduce and mitigate the effects of flood risk following guidance in the National Planning Policy Framework.

11. Sustainable Urban Drainage

The applicant is advised that surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SUDS). SUDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SUDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SUDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity. Where the intention is to use soak ways they should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365. Support for the SUDS approach to managing surface water run-off is set out in the National Planning Policy Framework (NPPF) and its accompanying technical guidance, as well as the London Plan. Specifically, the NPPF (2012) gives priority to the use of sustainable drainage systems in the management of residual flood risk and the technical guidance confirms that the use of such systems is a policy aim in all flood zones.

Policy 5.13 of the London Plan (2012) requires development to utilise sustainable drainage systems unless there are practical reasons for not doing so. Sustainable drainage systems cover the whole range of sustainable approaches to surface drainage management. They are designed to control surface water run-off close to where it falls and mimic natural drainage as closely as possible. Therefore, almost any development should be able to include a sustainable drainage scheme based on these principles.

The applicant can contact Harrow Drainage Section for further information

12. Mayoral Community Infrastructure Levy (provisional)

Please be advised that this application attracts a liability payment of £314,297 of Community Infrastructure Levy. This charge has been levied under Greater London Authority CIL charging schedule and s211 of the Planning Act 2008.

Harrow Council as CIL collecting authority upon the grant of planning permission will be collecting the Mayoral Community Infrastructure Levy (CIL). Your proposal is subject to a CIL Liability Notice indicating a levy of £314,297 for the application, based on the levy rate for Harrow of £35/sqm.

13. Harrow Community Infrastructure Levy (provisional)

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

Harrow's Charges are:

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

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

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

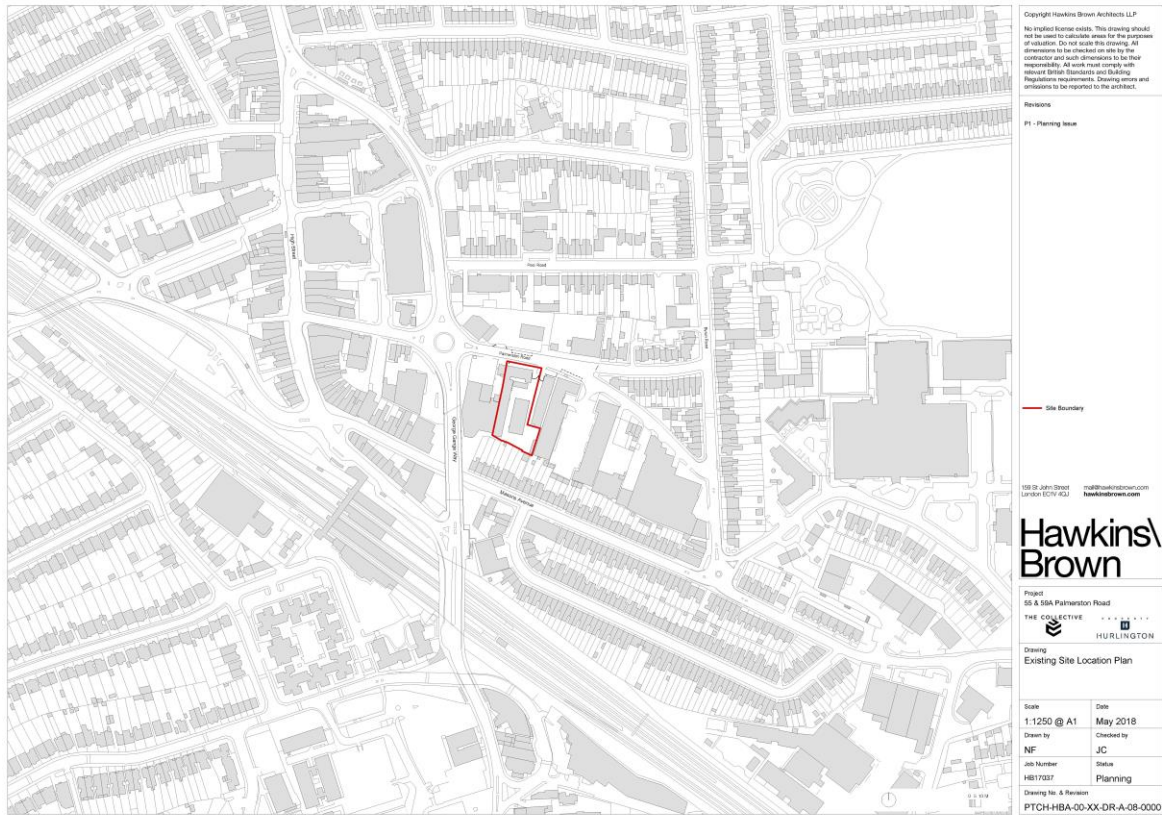
Restaurants and Cafes (Use Class A3) Drinking Establishments (Use Class A4)

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

All other uses - Nil.

The Harrow estimated CIL Liability for this development is: £453,877

APPENDIX 2: SITE PLAN



APPENDIX 3: SITE PHOTOGRAPHS



Application site and access route





Existing buildings/businesses on site



Existing buildings/businesses on site



View from south of site facing north



View from south of site facing north



View facing west (at the southern end of the site)



Residential properties adjoining the southern boundary of the site

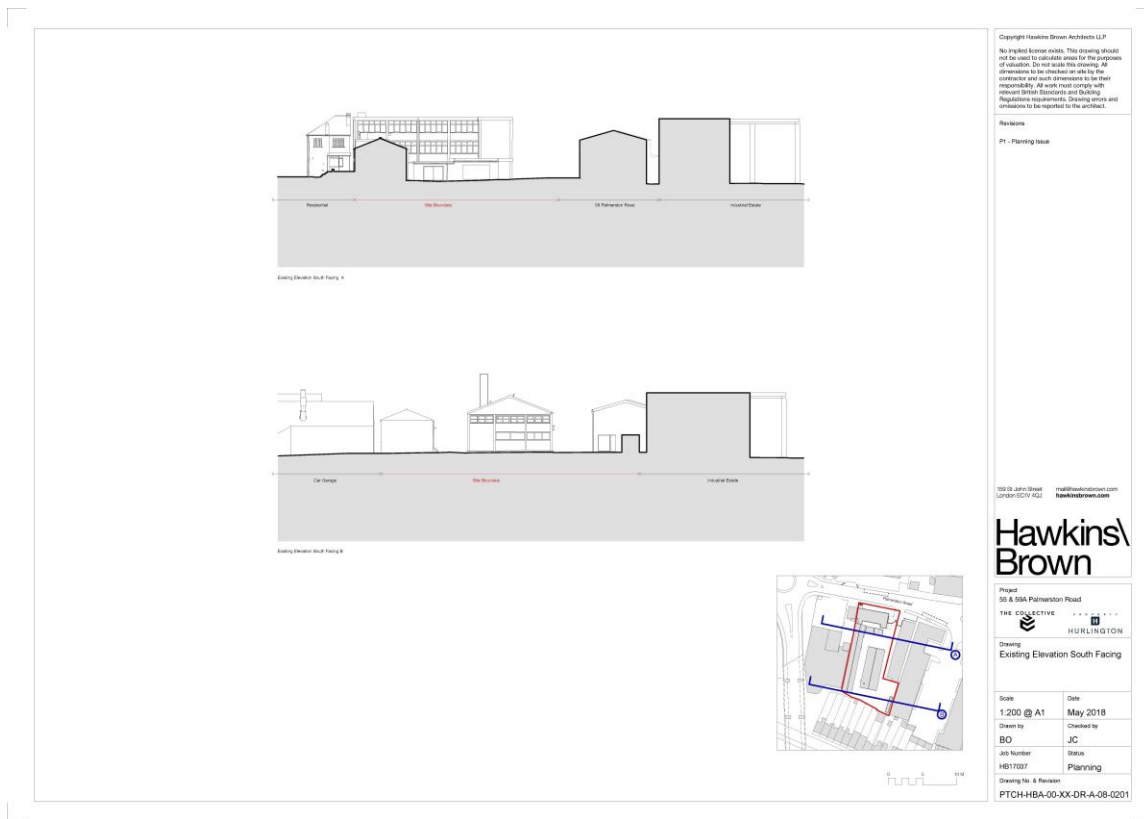


Application site (beyond rendered house) when viewed from A409

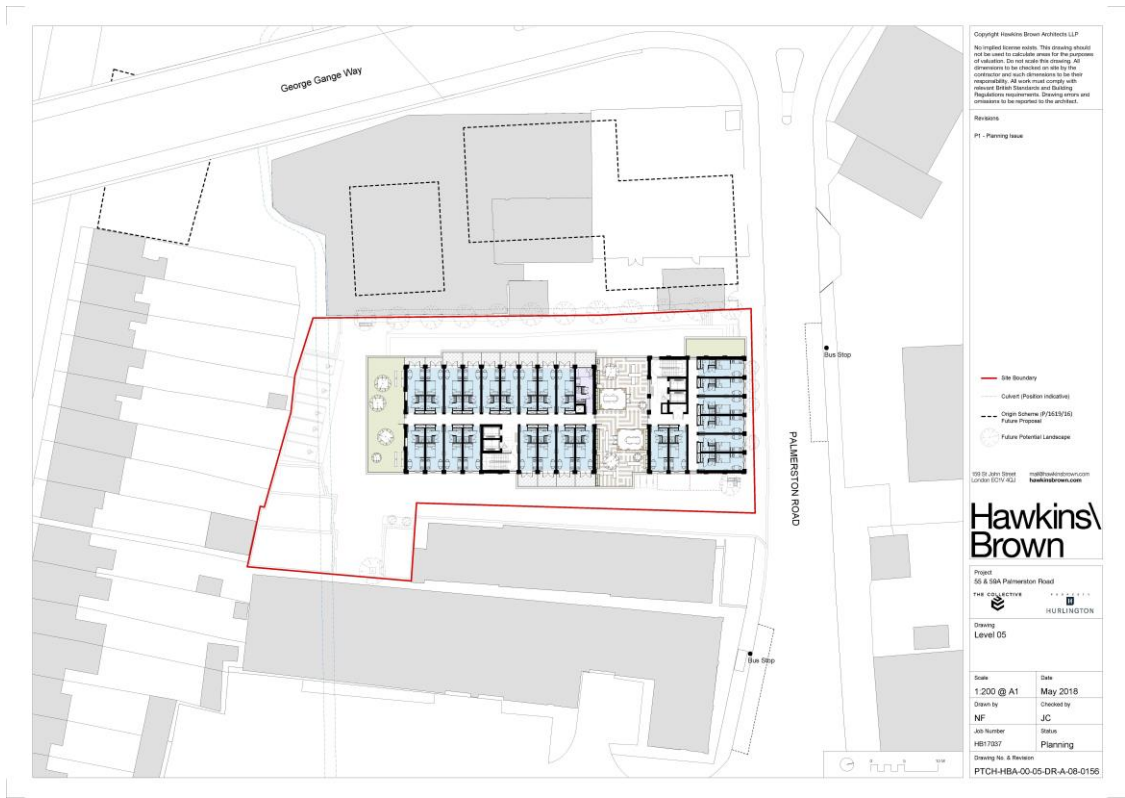
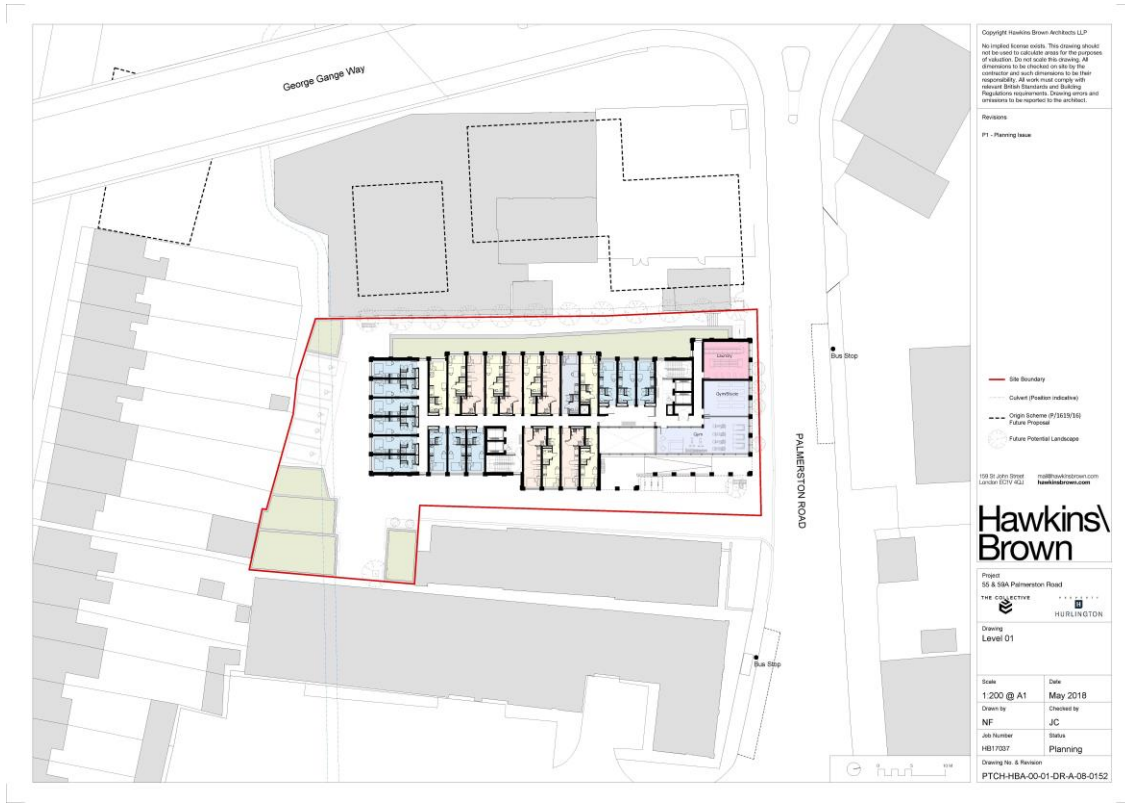


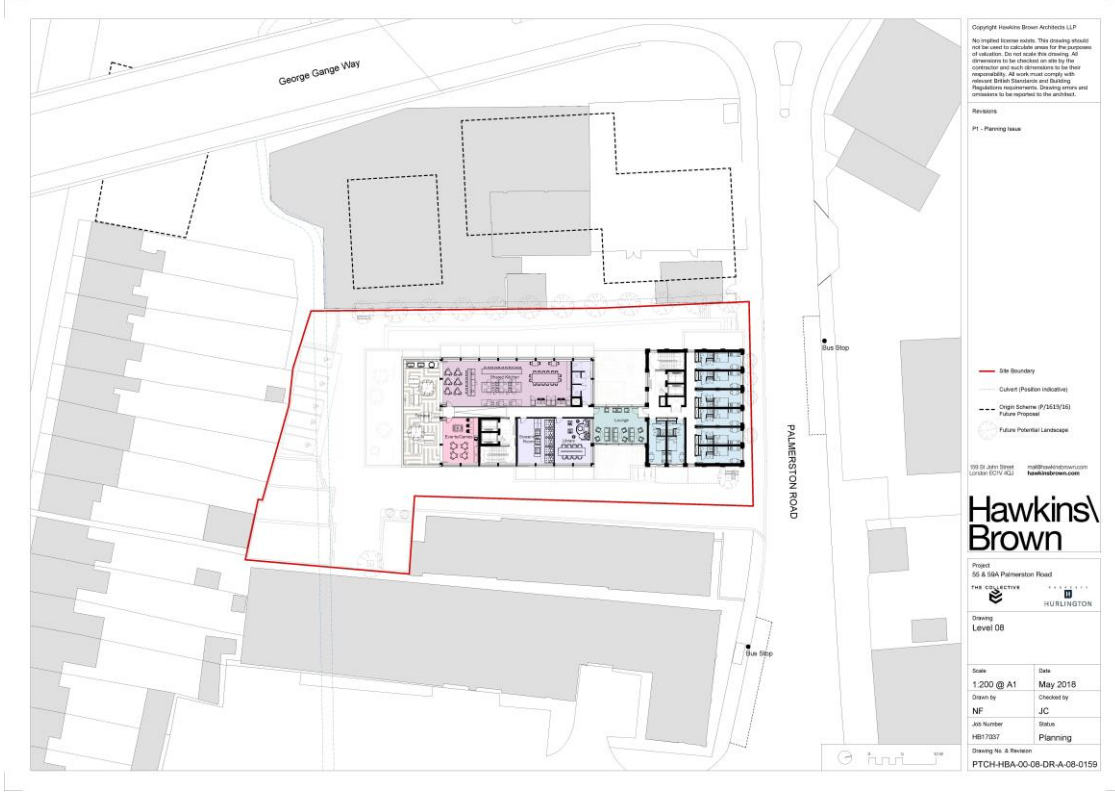
Application site when viewed from A409 flyover

APPENDIX 4: PLANS AND ELEVATIONS











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Revisions
P1 - Planning Issue

Origin Scheme (P164326)
Future Proposal

155 St. John Street London EC1V 4JZ
hbw@hawkinsbrown.com
hawkinsbrown.com

Hawkins Brown

Project
55 & 59A Palmerston Road
THE CO-OP
HURLINGTON

Drawing
South Facing Elevation

Scale	Date
1:200 @ A1	May 2018
Drawn by	Checked by
NF	JC
Job Number	Status
H817037	Planning
Drawing No. & Revision	
PTCH-HBA-00-XX-DR-A-08-0250	



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Revisions
P1 - Planning Issue

Origin Scheme (P164326)
Future Proposal

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hbw@hawkinsbrown.com
hawkinsbrown.com

Hawkins Brown

Project
55 & 59A Palmerston Road
THE CO-OP
HURLINGTON

Drawing
West Facing Elevation

Scale	Date
1:200 @ A1	May 2018
Drawn by	Checked by
NF	JC
Job Number	Status
H817037	Planning
Drawing No. & Revision	
PTCH-HBA-00-XX-DR-A-08-0252	



5.6 Perspective Looking from South



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