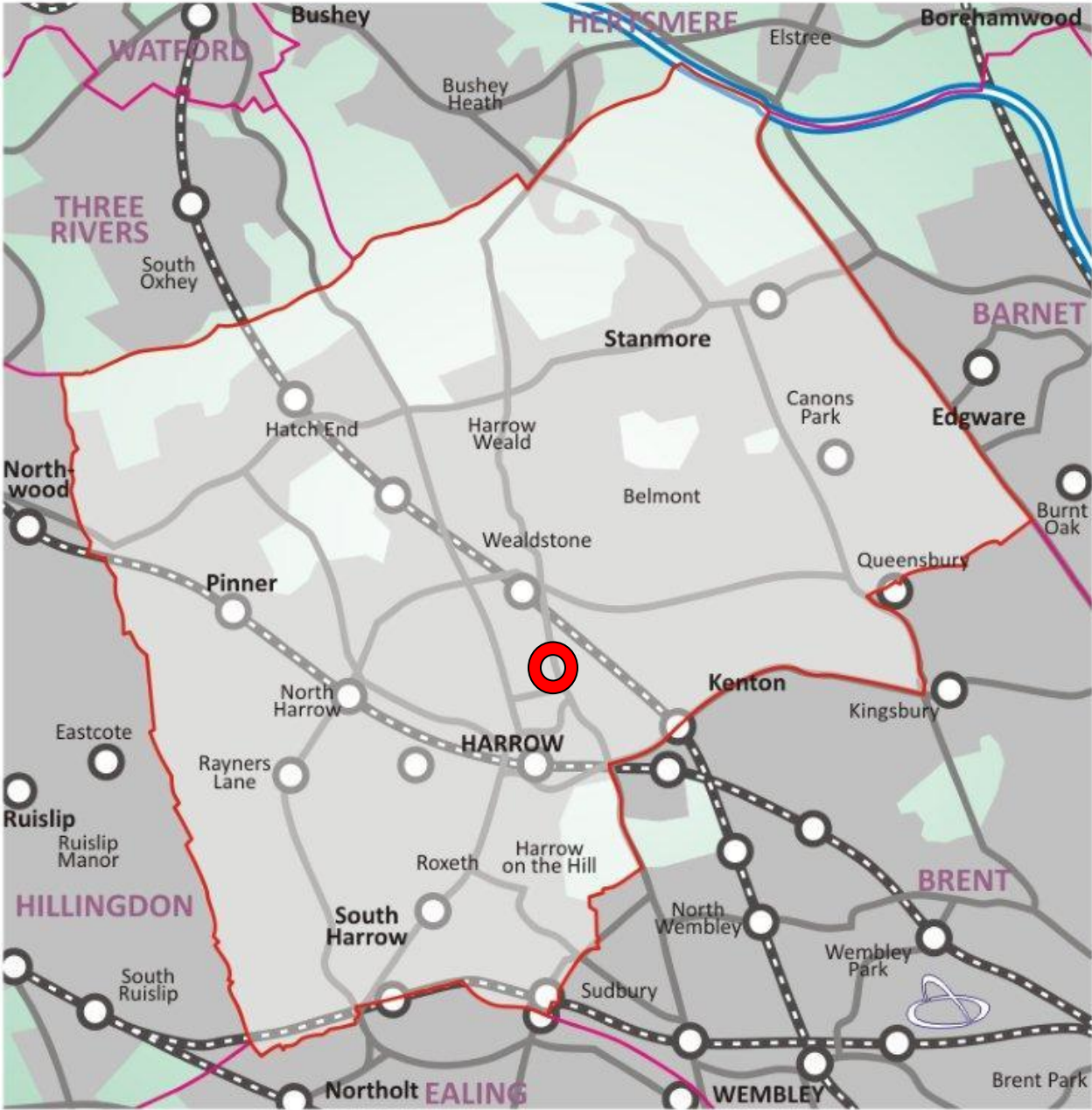
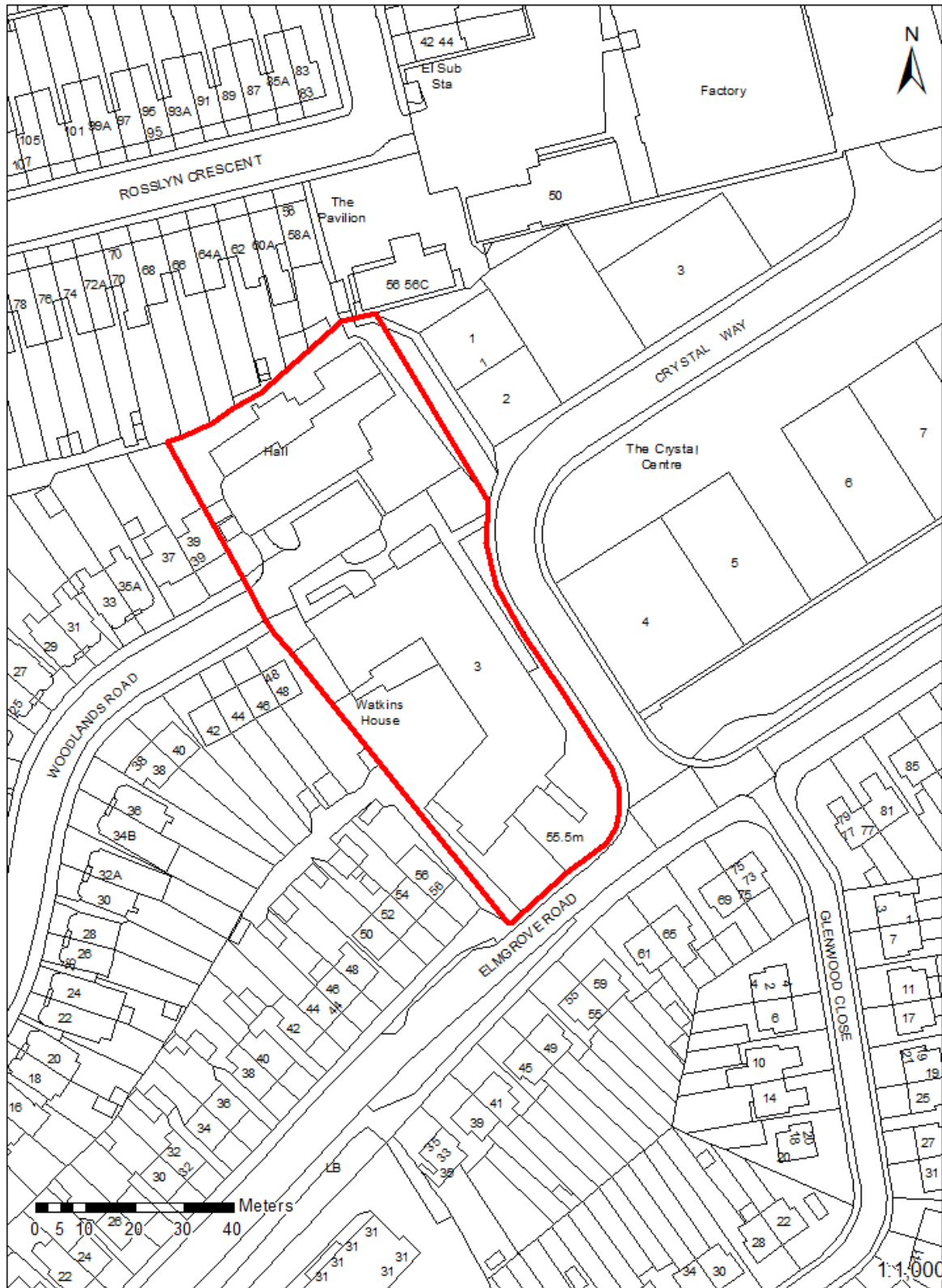


 = application site



<b>Watkins House &amp; Former Sea Cadet</b>	<b>P/4648/18</b>
---	------------------

# Watkins House & Former Sea Cadet Site, Woodlands Rd



This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office. Crown Copyright. Unauthorised reproduction infringes Crown Copyright and may lead to prosecutions or civil proceedings. London Borough of Harrow LA.100019206. 2018. DIGITAL MAP DATA (C) COLLINS BARTHOLOMEW LTD (2018)



# LONDON BOROUGH OF HARROW

## PLANNING COMMITTEE

12<sup>th</sup> December 2018

**APPLICATION NUMBER:** P/4648/18  
**VALIDATE DATE:** 18/10/2018  
**LOCATION:** WATKINS HOUSE AND FORMER SEA CADET SITE  
WOODLANDS ROAD, HARROW  
**WARD:** GREENHILL  
**POSTCODE:** HA1 2RS  
**APPLICANT:** HARROW CHURCHES HOUSING ASSOCIATION  
**AGENT:** STUDIOAITKEN  
**CASE OFFICER:** KIMRY SCHLACTER  
**EXPIRY DATE:** 17/01/2019

### PROPOSAL

Redevelopment to create a 3-5 storey building to create 78 flats (54 x 1 Bed flats and 2 x 2 bed flats in Extra care unit, 2 x 1 bed wheelchair accessible flats, 10 x 1 bed flats and 10 x 2 bed flats for shared ownership); New vehicle access from Crystal Way; Parking; Landscaping; Refuse Storage; Cycle Storage. Change of use of northern end of site from D1 to C3.

### 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:

### Affordable Housing

- Provision of 100% affordable housing comprising 56 (54 x 1B2P and 2 x 2B3P) low cost extra care rental units (*subject to further confirmation by Harrow Council, for use by people over 65 years of age*), 2 (1B2P) fully wheelchair adapted rented social housing units and 10 x 1B2P, 1 x 2B3P and 9 x 2B4P shared ownership housing units).

- Harrow Churches Housing Association (HCHA), or any sub lessee of HCHA, shall enter into a nominations agreement with the Council in order to ensure that suitable applicants from the Council's own waiting list can benefit from these proposals.
- 2 fully wheelchair adapted rented social housing units, 3 wheelchair adapted extra care units, and 2 wheelchair adapted shared ownership units.

### **Occupation Restrictions**

- *Subject to confirmation from Harrow Council, all occupants of the extra care units persons aged 65 and over (with the exception of the wheelchair accessible and shared ownership flats)*
- Potential residents for the extra care units (other than those exercising their right to return) will be subject to Adult Social Care services' usual assessment checks.

### **Transport and Highways**

#### *Travel Plan:*

- The submitted travel plan (or a revised Travel Plan if deemed necessary by the Council, and to be submitted to the Council prior to the first occupation of the building), to be implemented as approved unless otherwise agreed in writing.
- A travel plan bond of £10,000 will be required to secure the implementation of all measures specified in the revised Travel Plan. In addition a £5,000 monitoring fee is required to cover the cost of monitoring the travel plan. The developer to ensure the effective implementation, monitoring and management of the travel plan for the site.
- Should the travel plan not fulfil its agreed targets by year 5, the life of the travel plan may be extended, the cost of which will be met by the developer.

#### *Resident Parking Permit Restrictions:*

- The development to be 'resident permit restricted' and the developer to ensure that: (i) all marketing/advertising material makes reference to the fact that; and (ii) all lettings agreements contain a covenant to the effect that; future occupiers and tenants (other than those that are registered disabled) will not be entitled to apply for a residents parking permit or a visitor parking permit.

## **Employment and Training**

- The developer to submit to the Council for approval, prior to commencement of the development, a Training and Recruitment Plan. The developer to implement the agreed Plan. The training and Employment plan will include:
  - a) employment initiatives opportunities relating to the construction of the Development and details of sector delivery;
  - b) the provision of appropriate training with the objectives of ensuring effective transition into work and sustainable job outcomes;
  - c) the timings and arrangements for implementation of such initiatives and
  - d) suitable mechanisms for the monitoring of the effectiveness of such initiatives
- A financial contribution towards the management and delivery of the construction training programme based on the construction value of the development. This is usually calculated using the formula: £2,500 per £1,000,000 build cost.
- The developer to use all reasonable endeavours to secure the use of local suppliers and apprentices during the construction of the development.

## **Sustainability**

- A provision of carbon reduction on-site and payment of any off-set if zero carbon reduction is not achieved on-site, as determined by the final carbon reduction achieved on site as per Condition 29 of this permission. Based on the submitted Energy & Sustainability Statement dated October 2018 [Ref P18-096, Issue No. 2], this is currently estimated at a financial contribution of  $(61 \times £60 \times 30 \text{ years}) = £109,800$  towards carbon offsetting measures.
- A plan showing a safeguarding route onto Crystal Way for future connection to a District-wide Heating Network system

## **Legal Costs, Administration and Monitoring**

- A financial contribution (to be agreed) to be paid by the developer to the Council to reimburse the Council's legal costs associated with the preparation of the planning obligation and a further financial obligation (equivalent to 5% of the overall financial contribution) to be paid to reimburse the Council's administrative costs associated with monitoring compliance with the obligation terms.

## **RECOMMENDATION B**

That if the Section 106 Agreement is not completed by 28<sup>th</sup> February 2019, 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, 5.2, 6.3, 6.9 and 6.10 of The London Plan (2016), Core Strategy (2012) policy CS1, Harrow 7 Wealdstone Area Action Plan AAP10, AAP13, AAP19 and AAP20, and policies DM1, DM12, DM42, DM43 and DM 50 of the Harrow Development Management Policies Local Plan and the Supplementary Planning Document: Planning Obligations & Affordable Housing (2013).

## **REASON FOR THE RECOMMENDATIONS**

The existing Watkins House site is no longer adaptable or able to meet current demands for Extra Care housing. The overall combined comprehensive redevelopment of the former Sea Cadets and Watkins House sites would assist in the delivery of 100% affordable Extra Care, wheelchair adapted and shared ownership housing for which there is a demonstrable need. The scheme is linked to the existing community within the existing Watkins House facility through a “right to return” which could be maintained and enhanced providing important social benefits. Having regard to these factors and in the context of only one other existing affordable extra care housing scheme in the London Borough of Harrow, when viewed against the background of considerable identified growing demand for this housing type, the proposal is considered to provide a significant public benefit in the form of 100% affordable housing which would outweigh the less than substantial harm caused by the loss of community use space. The development is within a sustainable location and the design reflects and responds to the local context. Additionally, it has been found that there would be no detrimental impacts on the amenity of surrounding neighbouring occupiers, and that adverse highways impacts arising from the development, whilst not absent, would be reasonably mitigated. The development would, subject to conditions, result in landscape and ecological enhancements and would contribute towards the strategic objectives of reducing carbon reductions in the borough.

## **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:	Major Development
Council Interest:	Landowner / Council Housing initiative
Additional Floor Area:	7,071m <sup>2</sup>
GLA Community Infrastructure Levy (CIL) Contribution (provisional):	£247,485
Local CIL requirement:	£777,810

## **Environmental Impact Assessment**

The proposals comprising the current planning application have been the subject of a screening opinion in accordance with the Town and Country (Environmental Impact Assessment) Regulations 2017. Officer's consideration of the Environmental Effects of the development was that in this case an Environmental Statement was not required as the development does not constitute EIA development.

## **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.

## **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



## OFFICER REPORT

### PART 1: Planning Application Fact Sheet

The Site	
Address	Watkins House and Former Sea Cadet Site Woodlands Road, Harrow, HA1 2RS
Applicant	Harrow Churches Housing Association
Ward	Greenhill
Local Plan allocation	N/A
Harrow and Wealdstone Opportunity Area	Yes Also in "Heart of Harrow " Housing Zone
Conservation Area; Listed Building; or Setting of Listed Building	N/A
Drainage and Flood Risk	Harrow Strategic Flood Risk Area (SFRA) zones 3a and 3b, and critical drainage areas
Protected Views Restricted Corridor (red)	Northwest corner of site falls within a PV Restricted Corridor. However, only a 5-metre deep corner section of the building itself falls within it.
Protected Views Setting Corridor (yellow)	Whole of site is within this Corridor
RAF Northolt Safeguarding Zone	Whole of site within the (blue) designated area, however the height of the building is under the threshold for notification to the RAF
Designated Industrial and Business Use Areas	Adjacent designated industrial park on Crystal Way

Housing		
Density  <i>5040m<sup>2</sup> measured on plan (0.5ha) 0.48ha in Planning Statement</i>	Proposed Density hr/ha	168 hr *0/48ha = 80.64 hr/ha
	Proposed Density u/ph	38 u/ph
	PTAL	2
	London Plan Density Range	50 -95 units for a suburban site
	Breakdown by Type: <ul style="list-style-type: none"> <li>• 56 no. Extra care/supported living (54 no. 1-bed &amp; 2 no. 2-bed) flats (affordable rent)</li> <li>• 2 no. (1-bed) independent wheelchair flats (affordable rent)</li> <li>• 20 no. (10 no. 1-bed &amp; 10 no. 2-bed) flats</li> </ul>	

	(shared ownership)	
Dwelling Mix	Studio (no. / %)	-
	1 bed ( no. / %)	66 (132hr)
	2 bed ( no. / %)	12 (36hr)
	3 bed ( no. / %)	-
	4 bed ( no. / %)	-
	Overall % of Affordable Housing	100%
	Social Rent (no. / %)	58 / 0.74%
	Shared ownership (no. / %)	20 /26%
	Private (no. / %)	-
	Commuted Sum	-
	Comply with London Housing SPG?	GIA & room sizes – Yes Heights – Yes Amenity Space – Yes
	Required children’s play space	11.3m2
	Comply with M(4)2 of Building Regulations?	Yes – all flats
Comply with M(4)3 of Building Regulations?	2 no. wheelchair flats  4 no. flats in extra care fully M(4)3; and all bedrooms & bathrooms in extra care flats  2 no. shared ownership flats (10%)	

Non-residential Uses		
Existing Use(s)	Existing Use / Operator	<b>Watkins House:</b> Sheltered Care Home and Dwellinghouse <b>Sea Cadets Site:</b> Vacant
	Existing Use Class(es) sqm	<b>Watkins House:</b> Class C2 <b>Sea Cadets Site:</b> D1
Proposed Use(s)	Proposed Use / Operator	Extra Care Housing Accommodation / Harrow Churches Housing Association
	Proposed Use Class(es) sqm	Class C3
Employment	Existing number of jobs	14 full time and 1 “floating” support worker
	Proposed number of jobs	18 full time

Transportation		
Car parking	No. Existing Car Parking spaces	14
	No. Proposed Car Parking spaces	21 (8 wheelchair accessible bays) 6 – staff parking (C) 7 – shared owner (E) 8 – extra care (W)
	Proposed Parking Ratio	0.27
Buggy Storage	No. Proposed	18
Cycle Parking	No. Existing Cycle Parking spaces	-
	No. Proposed Cycle Parking spaces	30
	Cycle Parking Ratio	0.38
Public Transport	PTAL Rating	Primarily PTAL 2, partially within PTAL 4
	Closest Rail Station / Distance (m)	Harrow & Wealdstone approximately 1,015metres away. (Bakerloo, Overground and National Rail services)  Harrow-on-the Hill Station and Buses approximately 1.140 metres away.
	Bus Routes	Routes 340, 258, 182, 140, 186 within 375 metres of the site.
Parking Controls	Controlled Parking Zone?	Yes – Woodlands Road – Zone (CPZ) R, enforced 24 hrs.  Elmgrove Road & Crystal Way – CPZ F, restrictions enforced Monday to Saturday 0830 - 1830
	Previous CPZ Consultation (if not in a CPZ)	-
	Other on-street controls	Single and double yellow lines, and Pay & Display on-street parking, on some of the roads immediately around the site.
	Area/streets of parking stress survey	Crystal Way Elmgrove Crescent Elmgrove Road Glenwood Close

		Woodlands Road
Parking Stress	Dates/times of parking stress survey	Tues 24 <sup>th</sup> – Wed 25 <sup>th</sup> April 2018 between the hours of 0300 to 0030
	Summary of results of survey	Woodlands Road Zone (CPZ) R: Overnight parking period: average parking stress of 90% with parking opportunities for 5 vehicles  Elmgrove Road CPZ F: Overnight parking period: average parking stress of 90% with parking opportunities for 3 vehicles  Crystal Way CPZ F: Overnight parking period: average parking stress of 35% with parking opportunities for 9 vehicles
	Summary of proposed refuse/recycling strategy	On street from Crystal Way for extra care units Off street from Woodlands Road for wheelchair accessible units On street from Elmgrove Road for shared ownership units
Refuse/Recycling Collection		

<b>Sustainability / Energy</b>	
BREEAM Rating	n/a
Development complies with Part L 2013?	Yes
Heating Infrastructure	Combined heat & Power for extra care housing  Provision of fixings to allow future connections to District Energy Network
Renewable Energy Source / %	PV Panels

## **PART 2: Assessment**

### **1.0 SITE DESCRIPTION**

- 1.1 The proposed site is an agglomeration of two existing sites: Watkins House, and the former Sea Cadets grounds.
- 1.2 The Sea Cadets site is currently vacant, and contains one larger single storey building, as well as smaller sheds. This site is hard surfaced.
- 1.3 The Watkins House site is currently occupied by the existing Watkins House sheltered care home (2-3 storeys), with landscaped green areas and existing parking. As units are not currently being re-let, the building is not fully occupied at present.
- 1.4 The site levels fall towards the north, and then rise again on the Sea Cadets site, with an overall difference of approximately 3.5m.
- 1.5 Existing access for both sites is off Woodlands Road. Watkins House also fronts Elmgrove Road and Crystal Way. A pedestrian path connects Crystal Way and Rosslyn crescent along the north-eastern boundary of the combined site.
- 1.6 Watkins House has 8 existing parking bays accessible from Woodlands Road. An ancillary vehicular access point of Elmgrove Road provides an additional 6 parking bays.
- 1.7 Site is located in the Harrow and Wealdstone Opportunity Area.
- 1.8 The site is bounded by residential areas to the north, west, and south. To the east lies a designated Industrial Use area (The Crystal Centre). There are also some business/commercial properties to the south-west along Elmgrove Road.
- 1.9 The site has a PTAL rating of 2, although a small portion is within a PTAL 4 area.
- 1.10 Located in Critical Drainage area, and Harrow Strategic Flood Risk Area (SFRA) zones 3a and 3b. A culvert crosses the northern edge of the site.
- 1.11 The site is located within the Protected Views Setting Corridor (yellow); while the north-west corner of the Sea Cadets site falls within the Protected Views Restricted Corridor (red)

### **PROPOSED DETAILS**

- 2.1. The proposal is for redevelopment of the combined sites, comprising a 3-5 storey building accommodating 78 residential units (Use Class C3). The units are partially comprised of an extra care facility, and partially of other affordable housing tenure types. The existing Watkins House and Sea Cadets buildings would be demolished. The 78 residential units would comprise:

- 56 no. Extra care/supported living (affordable rent)
- 2 no. (1-bed) independent wheelchair flats (affordable rent)
- 20 no. (10 no. 1-bed & 10 no. 2-bed) flats (shared ownership)

2.2. The proposed accommodation would be configured as follows:

<b>Extra Care Affordable Rented Configuration</b>	
<b>56 flats plus ancillary space</b>	
Ground Floor	7 extra care flats comprising 7 no. 1b/2p  Lounge and communal kitchen; , meeting/activity room; 3 no. offices; staff area; lobby/entrance area  Refuse and plant areas; cycle (x 1) and electric buggy store (x 18) and cycle parking (x1); laundry; 3 communal WCs,
First Floor	19 extra care flats comprising 18 no. 1b/2p and 1 no. 2b/3p  Guest Suite/respice care  Communal seating area
Second Floor	19 extra care flats comprising 18 no. 1b/2p and 1 no. 2b/3p  Guest Suite/respice care  Communal seating area
Third Floor	11 extra care flats comprising 11 no. 1b/2p  Communal seating area
<b>Fully Wheelchair Adapted Affordable Rented Social Housing Configuration</b>	
<b>2 flats</b>	
Lower Ground	2 wheelchair adapted general needs flats comprising 2no. 1b/2p units, M4(3) standard  Independent access for each flat, close to wheelchair parking bays.

	No private amenity space; communal space only
<b>Shared Ownership Configuration</b>	
<b>20 flats</b>	
First Floor	4 shared ownership flats comprising 1 no. studio, 2 no. 1b/2p, and 1 no. 2b/3p flats  Refuse and gas / electrical areas; cycle parking (x 30 spaces)
Second Floor	5 shared ownership flats comprising 3 no. 1b/2p, and 2 no. 2b/4p flats
Third Floor	5 shared ownership flats comprising 3 no. 1b/2p, and 2 no. 2b/4p flats
Fourth Floor	4 shared ownership flats comprising 1 no. 1b/2p, and 3 no. 2b/4p flats
Fifth Floor	2 shared ownership flats comprising 2 no. 2b/4p flats

- 2.3. The building would have three storeys at the northern end of the site, stepping up to five storeys towards the southern end. The five storey element is sited towards Crystal Way and the Industrial Park.
- 2.4. Extra care accommodation to include communal living areas and facilities; activity/treatment room, visitors accommodation, and offices, with access off Woodlands Road. Staff would be expected to be present 24hrs a day, however there would be no resident staff.
- 2.5. 2 specialised wheelchair flats incorporated into the extra care building, but with independent entrances, and accessed off Woodlands Road. These units would be available to eligible occupants of any age, including younger independent adults.
- 2.6. Shared ownership flats sited to the southern end of the site, with access off Elmgrove Road.

- 2.7. Three access points are proposed, including one new/restored access off Crystal Way. Car parking provided in three courts, totalling 21 bays. Eight bays are provided at the main entrance for the extra care facility, off Woodlands Road, with 6 being wheelchair accessible, and two for short-stay visitor parking and passenger drop-off. Six bays are provided for staff parking, off Crystal Way. Parking for shared ownership flats off Elmgrove Road, with a total of seven bays, two of which are wheelchair accessible bays.
- 2.8. Storage for 18 mobility buggies for the extra care facility, with 1 no. cycle parking space. The shared ownership units will have a space for 30 no. cycles.
- 2.9. Servicing, including waste, for the extra care facilities is off Crystal Way (on-street); whilst access off Woodlands Road would be primarily for residents and visitors (off-street). Woodlands Road entrance includes facilities for on-site turning, servicing and delivery to the extra care housing, and emergency vehicle access. Servicing for the shared ownership flats is off Elmgrove Road. Servicing for the specialised wheelchair flats would be from Woodlands Road.
- 2.10. Three communal garden areas are proposed around the site, one of which would be accessible to occupants of the shared ownership flats and will include children's play equipment.
- 2.11. A "Right to return" would be available for existing Watkins House residents.
- 2.12. The following amendments were received by the Local Planning Authority following the original submission of the planning application:
- Minor amendments/corrections to window sizes and details, and the refuse door
  - Minor adjustments to internal layout of shared ownership accessible M(4)3 flats

### **3.0 RELEVANT PLANNING HISTORY**

Ref no.	Description	Status and date of decision
<b>Watkins House site</b>		



LBH/4028	Site: Watkins House, Woodlands R Harrow Hamilton Sports Ground  Description: Erection Of A Boundary Fence	Granted – 09/04/1969
LBH/21448	Site: Open Land Adj. 56 Elmgrove Road, Harrow  Description: Very Sheltered Housing 1/2/3, Storey Block With Wardens Flat & Parking	Granted – 08/07/1982
<b>Harrow Sea Cadets Corps site</b>		
HAR/4732	Erect H.Q. Hut	Granted – 24/05/1951
HAR/4732/B	Extend Exist Hut	Granted – 22/04/1958
HAR/4732/D	Erect Additional Hal	Granted – 11/04/1962
LBH/1278/1	Erection Of Single Storey Rear Extension To Provide Storage And Toilet Accommodation And Erection Of Boundary Walls	Granted – 07/05/1973
LBH/1278/2	Alterations And Erection Of Extension To Provide Mess Deck Building And Covered Way	Granted – 08/02/1974
LBH/1278/3	Erection Of Single Storey Storage Building	Granted – 21/05/1975
LBH/1278/4	Erection Of 2 Single Storey Buildings For Use As Boat Workshop	Granted – 18/07/1975
LBH/1278/5	Retention Of 2 Single Storey Buildings For Use As Workshops	Granted – 12/03/1976
LBH/1278/6	Continued Consent For Retention Of Additional Hall For Instruction Classes	Granted – 12/03/1976

P/1050/13	Partial Demolition Of Hall And Construction Of Single Storey Infill Extension	Granted – 10/07/2013

#### 4.0 **CONSULTATION**

4.1 A Site Notice was erected on 30<sup>th</sup> October 2018 expiring on 20<sup>th</sup> November 2018.

4.2 Press Notice was advertised in the Harrow Times on the 1<sup>st</sup> November 2018 expiring on 21<sup>st</sup> November 2018.

4.3 The application was advertised for the following reasons:

- Major application

4.4 A total of 627 consultation letters were sent to neighbouring properties regarding this application, on 26<sup>th</sup> October 2018.

4.5 The overall public consultation period expired on 21<sup>st</sup> November, 2018.

#### 4.6 Adjoining Properties

Number of letters Sent	627
Number of Responses Received	2
Number in Support	0
Number of Objections	2
Number of other Representations (neither objecting or supporting)	0

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

Summary of Comments	Officer Comments
Parking assessment was based on office hours therefore did not accurately reflect evening parking	Highways officers have noted and considered this in their comments and
Concern that future occupiers of the development would have president parking permits, when there is already often insufficient parking compared to demand. Additional concerns regarding impacts of such increased demand on availability of paid parking bays for visitors and on the Crystal Way businesses.	The proposal, if granted, would be subject to a legal agreement restricting resident permits.

4.8 Statutory and Non Statutory Consultation

4.9 A summary of the consultations which have been undertaken along with responses received and the Officer comments are set out below:

Summary of Comments	Officer Comments
<p><b><u>Planning Policy Officer :</u></b></p> <p>A portion of the proposed site comprises the former Sea Cadets hall, and is currently allocated as Use Class D2. The loss of the D2 community use must therefore be justified, as per policy DM47 of the Harrow Development Management Policies (2013) and policy CS1.Z of Harrow’s Core Strategy.</p> <p>It appears that the Harrow Sea Scouts have now merged with Wembley Sea Scouts, but are still located within the Borough (Wealdstone). Notwithstanding this, it is the loss of circa 220sqm of community floorspace from this locality, which is sought to be resisted. The submitted application is unable to comply with Policy DM47A(a), (b) or (c).</p> <p>The proposed development would result in a scheme that offers 100% of the accommodation as an</p>	Noted

affordable product, which far exceeds the Borough wide target of 40%. Moreover, 74% of the housing would be provided as extra care accommodation, which would be offered at affordable rent. This exceeds the 60% (of the overall offer of affordable product) tenure split, which favours the affordable rented product that is identified within the Borough as being the most needed. This results in the remaining 26% being offered as shared ownership and as general accommodation. The typology of the accommodation shall be secured by way of a S.106 legal agreement

Given the identified need for the type of housing proposed, the net increase in units, the quality of the accommodation, and the 100% affordable nature of the product, it is considered that the proposed development would secure an overriding public benefit, and would comply with DM47(d)

The current accommodation provided on the site was developed in 1986. However, it is noted that the living accommodation falls short of current care home standards. Overtime the standards set for care homes, primarily through the Care Quality Commission (CQC) have changed as the understanding of providing a satisfactory level of accommodation for occupiers of such a product has evolved. The supporting information states that much of the proposed accommodation would comply with the London Plan criteria. However, it is noted that care homes are not required to meet London Plan standards. The submitted information also state that the proposed development aspires to comply with HAPPI (Housing our Aging Population Panel for Innovation) principles, which aims to ensure the best quality of accommodation for aged persons.

The proposed development would provide specialist older person / extra care accommodation, which would result in a replacement of the existing older persons accommodation that exists on site. As already mentioned, the existing accommodation is already dated and does not provide a satisfactory level of accommodation. Specifically, the facility would be designed to allow for dementia care, which is a form of specialist accommodation, which again is a typology that is demonstrably needed. Lastly, the application site is located in a relatively sustainable area. The application site sits within a Public

<p>Transport Accessibility Level of 2, which in and of itself its quite poor. However, the property is very close to PTAL 4 and 5 which is adjacent to Station Road. Station Road has both numerous bus links and public amenities. Accordingly, it is considered that the proposal would accord with Policy DM29 of the Harrow &amp; Wealdstone Development Management Policies Local Plan (2013).</p>	
<p><b><u>LBH Highways</u></b></p> <p><b>Site context:</b>  PTAL 2/4  CPZ R – Woodlands Road – 24 hours  CPZ F – Elmgrove Road and Crystal Way – Mon-Sat 8:30-18:30</p> <p><b>Parking:</b>  Since the survey was undertaken, the number of bays in Woodlands Road has been reduced by one which may mean that that the parking stress level is higher still. Whilst it is proposed to restricted residents of the extra care facility and the shared ownership flats from apply for parking permits, blue badge holders will still be eligible to park in permit bays and the permit restriction must exempt blue badge holders meaning that they would still be entitled to apply for permits. Based on the data from Ewart house, we can anticipate a demand for 6 residential parking spaces. The ptal of Ewart House is lower at 1b however, Watkins House proposes 7 more units. This would mean that there is a starting shortfall of two residential parking spaces, nevertheless, it is possible that there may be less occupants using cars due to the ease of access to local amenities and public transport. The extra care facility is unlikely to generate much of an impact on CPZ F as the entrance is in Woodlands Road.</p> <p>Based on this data, the proposed parking levels do not appear to meet the requirements likely to be generated in respect of the resident parking demand. Whilst the proposed parking permit restriction may prevent some residents from applying for permits for the surrounding zones, blue badge holders will still be eligible to park in permit bays and the permit restriction must exempt blue badge holders meaning that they would still be entitled to apply for permits. This may have an impact on CPZ R in particular if there is higher demand for disabled parking than the</p>	<p>Recommended conditions and S106 requirements applied</p>

four spaces proposed.

The surveys do not demonstrate that the proposed loss of two shared use bays on Crystal Way would be acceptable as they do not show daytime use which is when the controls operate. Crystal Way is a route through an industrial estate meaning the parking is likely to take place there during the opening hours of the various businesses. In order to determine whether the loss would be acceptable or not, surveys would need to be undertaken during daytime hours, however visual observations suggest that these bays are not heavily used.

**Cycle Parking:**

30 spaces for the shared ownership are acceptable based on LP2016 figures; however agree with remainder of TfL's recommendations including staff provision.

**Waste collection:**

The proposed waste collection arrangements need to be considered and agreed by the Council's waste team as it doesn't comply with the current policy due to the carry distance being beyond 10 metres.

**Access:**

The access in Crystal Way may need to be modified in order to allow for access to the staff car park and the removal of two pay and display bays. These alterations would be at the expense of the developer and subject to a separate application to the Vehicle Crossing team.

The proposals for vehicular access are otherwise acceptable.

**Summary:**

In policy terms this proposal meets the Highway requirements of the London Plan and Harrow Development Management policies and is generally acceptable however, not completely without impact on the surrounding roads. The development does have the potential to generate amounts of overspill parking on to roads that already experience high levels of parking demand overnight. It is not possible to determine the precise number of cars that will be associated with the development as the occupants are currently unknown, however, the location of the development does mean that access to shops, public

<p>transport and other amenities are all within relatively easy reach and the expectation that many residents would use electric buggies/scooters in favour of cars may be realised for this reason. The parking permit restriction will prevent all non-blue badge holders from obtaining permits for any CPZ and the travel plan will seek to reduce car journeys.</p>	
<p><b><u>Travel Plan Officer:</u></b></p> <p>A full travel plan rather than a statement travel plan is needed in his case, as the proposal is expecting to achieve a significant amount of non-car activity and this can only be realised with the support of a full travel plan.</p> <p>Due to the complexity of this development it is recommended that the travel plan take into account the residential and employment aspects; and because the care home residents are more likely to have regular visitors, the travel plan should also include measures for visitors.</p> <p>Details required for the travel plan provided.</p>	<p>Recommended conditions and S106 requirements applied</p>
<p><b><u>Vehicle Crossing Officer:</u></b></p> <p>The proposed access off Crystal Way may not be up to current specifications for the proposed use. Additional work may be required which requires separate consent from Harrow Highways. Consideration should be given as to whether the Elmgrove Road access is sufficient as well.</p> <p>A TTRO (temporary traffic order) will be required during the construction phase for the bays proposed to be taken over for servicing. A permanent order will be required in the long-term.</p> <p>Given the location of the proposed servicing area on a bend along Crystal Way, care will need to be taken to avoid obstructions to HGVs, other traffic. Considerations should be given to whether this could be re-located, and whether 2 bays will be sufficient.</p> <p>No on-street parking can be allowed to the front of the site on Elmgrove Rd</p> <p>More details for Construction plan are needed, including transportation of cranes.</p>	<p>These matters have been addressed via conditions and informatives</p>
<p><b><u>Transport for London :</u></b></p>	<p>Recommended conditions</p>

<p>The proposed number of parking spaces for both the extra care and the other units is considered acceptable given the proposal's nature and PTAL rating. All the parking should be controlled by a Parking management plan with electric vehicle charging points be evenly provided for at least 20% of the spaces from the on-set along with passive provision for the rest. A 'permit free' restriction should also be imposed by the council.</p> <p>In accordance with the Draft London Plan cycle parking standards, a minimum of 35 cycle parking spaces (1.5 space for 1 bed flat and 2 spaces for 2 beds) should be provided for the ordinary residential units; the current proposal of 20 spaces is well short of the Standards and needs to be increase accordingly. It is also noted that the extra care units would be with 1 long stay and three short stay spaces, TfL requests that at least 1 additional long stay spaces be provided for staff, to be in line with the Draft London Plan standards. The applicant shall also ensure that least 5% of the cycle parking spaces be designed for adopted/ cargo bikes in line with the LCDS, and provide shower and changing facilities for the staff of the extra care units.</p> <p>The submission of the Travel Plan statement is welcomed and should be secured by s106/ planning condition accordingly.</p> <p>As such, TfL requests that the applicant to address the issues raised above ensuring the proposal comply with London Plan policies.</p>	<p>and S106 requirements applied</p>
<p><b><u>Waste Management Officer:</u></b></p> <p>Most of the arrangements appear to be adequate. Some reservations regarding collections from Elmgrove Road as it's not clear where the bin store is.</p>	<p>Noted</p>
<p><b><u>Drainage Authority:</u></b></p> <p>With regards to the above planning application, we can confirm that the Flood Risk Assessment submitted by the applicant is satisfactory. Recommended conditions provided.</p> <ul style="list-style-type: none"> <li>• Flood Displacement storage levels regarding existing and lowered areas related to existing Finish Floor Level or any fixed level should be</li> </ul>	<p>Recommended conditions and S106 requirements applied</p>



<p>submitted for our approval.</p> <ul style="list-style-type: none"> <li>• Drainage details in line with our standard drainage requirements should be submitted. Please note the Surface Water disposal, Foul water disposal and Surface water attenuation and storage full details requested can be conditioned.</li> <li>• Please note two surface water connections should discharge at 2.5 l/s each (5 l/s in total from the site)</li> <li>• Permeable paving construction details and maintenance plan for the proposed hardstanding should be submitted.</li> <li>• Rain Garden and Green Roof details should be submitted.</li> <li>• New Vehicle access - the information submitted by the applicant for new vehicle access looks fine, however it should be constructed in line with <b>Harrow's New Vehicle Crossing Policy, dated September 2017</b>. Please advise the applicant to contact Vehicle Crossings Team on <a href="mailto:VehicleCrossings@harrow.gov.uk">VehicleCrossings@harrow.gov.uk</a> for further details/estimate.</li> </ul>	
<p><b><u>Urban Design Officer :</u></b></p> <p>Final comments in relation to Major Applications submission; scheme has been previously interrogated by DRP and follow-up meetings with Harrow Design Advisor.</p> <p><b>Form and Massing</b></p> <p>Good proportions now achieved by ultimately raising the 'end' block to give much needed elongation. It is felt that the building now sits comfortably in the streetscape, and enough variations in material and balconies break up the mass sufficiently.</p> <p><b>Room Layouts and Balconies</b></p> <p>Good to see slender vertical windows to help elongate overall proportions of the building.</p> <p>Further studies of the balcony will hopefully</p>	<p>Noted, and conditions applied</p>

<p>demonstrate a high quality, well detailed balustrade and give lightness to the spaces. Removing the structural legs to the ground has already helped lighten the feel of these amenity spaces.</p> <p><b>Material</b></p> <p>Limit the material palette to two brick types; main, dominant brick can be used to achieve the variety of textures demonstrated on the main elevations (perforated, relief, smooth), offset with a potentially new brick tone introduced for the top storey. Preferred brick should be dark/browner in tone with dark mortar. Use of vibrant glazed brick to both distinguish and celebrate entrances is very much welcomed.</p> <p><b>Landscape</b></p> <p>Integration of communal, shared spaces with all residents at ground floor is desired; noted that this has been attempted in certain areas of the landscaping strategy. All external material samples to both hard landscape and building envelope should be submitted as part of the applications associated conditions.</p>	
<p><b><u>Designing Out Crime Officer:</u></b></p> <p>The DOCO Officer has met with the developer and provided site-specific advice.</p> <p>A condition whereby the development must achieve Secured by Design accreditation is recommended.</p>	<p>Noted, and conditions applied</p>
<p><b><u>Landscape Architect:</u></b></p> <p>Greater detail is however required to be submitted, at a larger scale and clarification and further detail obtained by requesting landscape conditions.</p> <p>The extent of the proposed tree loss whilst regrettable, was discussed at the pre application meetings, with reasoning on the quality and current condition of the trees and agreed in principle.</p> <p>The proposed car parking and hard surfacing would dominate this area, enclosed by a high 2.1 metre high wall and although small bands of planting are proposed there would be a need to soften the car parking further, with new tree planting. This could be within the proposed planting and would be essential,</p>	<p>Recommended conditions and S106 requirements applied</p>

<p>to mitigate the loss of the prominent weeping willow tree. New proposed trees should be added into the landscape proposals and be part of the landscape condition.</p> <p>The proposed widespread use, throughout the development, of timber decking is questionable. The Landscape strategy images show some decking areas with distinct level changes and a ramped path to overcome the level change, shown in the landscape masterplan. I question the safety of timber, which often becomes slippery and requires very regular maintenance to keep clean and prevent it from becoming slippery. The level changes would seem likely to be unsuitable for some of the extra care residents, who may be in wheelchairs or unsteady when walking.</p> <p>Children's play natural type equipment provision is noted and this is to be detailed and included in the landscape condition</p> <p>The Landscape Strategy notes the garden will not be accessible for the residents but will be visible from inside the building. It is however also noted that there will be access onto a timber deck for seating, which would be via the timber deck boardwalk. This proposed semi-circular boardwalk is too narrow for the extra care residents to safely access, and as noted previously, potentially slippery and likely to be unsuitable for use by the majority of the extra care residents</p> <p>Proposed bio- diverse roofs, living walls, with climbing plant structures adjacent to the building and pergola structures on the ground and balconies are all welcomed and details of these proposals are required and are to be conditioned. The proposed details of enhancements to the biodiversity are required and provision for the on-going management and maintenance. This is essential to ensure the plants survive and thrive, - . details of programme of the management and maintenance and ongoing plant replacement if / as any plants fail to thrive or die, for the whole lifetime of the development.</p> <p>Details of rain gardens required</p> <p>Details of proposed exterior lighting are required.</p>	
<p><b><u>Tree Officer :</u></b> The majority of trees recommended for removal are</p>	<p>Recommend ed conditions</p>

<p>average-low quality (C grade) and with the exception of the Weeping Willow adjacent to the footpath are the rear of the site, their loss should not have a significant impact on the wider area. The better quality Limes fronting Elmgrove Road are being retained, as are the 2 x 'B'grade Limes at the rear, within what is proposed to be one of the outdoor amenity spaces.</p> <p>The Weeping Willow is a prominent feature and its loss is regrettable, but is in poor condition, and as noted in the report the level of works required to salvage it would probably accelerate its decline and diminish its amenity value drastically.</p> <p>Some new trees would be welcome here (possibly within the hedge on the rear boundary) to mitigate the loss of greenery on this side of the site.</p> <p>A finalised tree protection plan showing position of all protective fencing should be provided (the plan provided only seems to show fencing in relation to the tree on the rear boundary). The Limes fronting Elmgrove Rd and those at the rear / side also need to be excluded during construction but nothing is shown on the plans for these.</p> <p>Suitable conditions recommended.</p>	<p>and S106 requirements applied</p>
<p><b><u>Biodiversity Officer :</u></b></p> <p>The site is surrounded by a mix of urban dwellings and commercial/industrial areas and is set well away from any sites of importance for nature conservation or other green spaces. Development of the site should therefore provide an opportunity to enhance the value of the site and its environs in accordance with local, mayoral and national planning policy.</p> <p>A thorough PEA and bat roost assessment with follow up surveys have been undertaken and I judge that these generally provide an adequate assessment of the sites and its features of biodiversity value.</p> <p>Where issue should be taken with the PEAR is in how it dismisses habitats of relatively low conservation value. Evidently the applicant didn't request a quantification of the net losses or net gains for biodiversity and the environment more generally. This leaves us in the position of having to make such an appraisal based on the information available. The fact that some habitats may be easily and quickly</p>	<p>Recommended conditions applied</p>

<p>recreated isn't that useful if there aren't adequate opportunities or the measures in place to put these to use.</p> <p>Whilst I wouldn't propose objection to the scheme it presently represents a net loss to biodiversity overall and will require additional measures to be acceptable. Conditions have been recommended</p>	
<p><b><u>Conservation Officer:</u></b></p> <p>The recommended requirement in the applicant's heritage assessment for documentation during demolition and construction should be implemented. Final report should be submitted to the Greater London Historic Environment Record for their permanent record.</p>	Noted, and condition applied
<p><b><u>Environmental Health Officer:</u></b></p> <p>No response received</p>	
<p><b><u>Environment Agency:</u></b></p> <p>No response received</p>	
<p><b><u>Natural England:</u></b></p> <p>Natural England has no comments to make on the application</p>	Noted
<p><b><u>Historic England:</u></b></p> <p>No response received</p>	
<p><b><u>Historic England Archaeology:</u></b></p> <p>Recommend no archaeological requirement</p>	Noted
<p><b><u>Thames Water Ltd:</u></b></p> <p>There are public sewers in proximity to the development; therefore the applicant is advised to ensure the development does not reduce or limit capacity to maintain or repair the sewer (link)</p> <p>The development is within 15m of our underground waste water assets, therefore an informative is recommended regarding appropriate precautionary measures.</p> <p>Consent will be required should the developer plan to discharge of surface water to the public sewer. A Groundwater Risk Management Permit will be</p>	Noted, suitable informatives included

required for discharging groundwater into the public sewer. Any discharge made without such a permit may be deemed illegal.	
<b><u>Affinity Water:</u></b>  No response received	
<b><u>Lighting Engineer:</u></b>  No response received	
<b><u>Economic Development Officer:</u></b>  As a major application, Economic Development will be seeking construction employment opportunities on site in line with Policy E11 Skills And Opportunities For All of the London Plan.  This will be secured through a s106 agreement which will include reference to:  (i) a training and employment plan that will be agreed between the council and the developer prior to start on site and  (ii) a financial contribution towards the management and delivery of the construction training programme based on the construction value of the development.  Finally, we would expect that the developer would use all reasonable endeavours to secure the use of local suppliers and apprentices during the construction of the development.	Recommend ed S106 requirements applied
<b><u>Housing Enabling Project Officer:</u></b>  I support the Harrow churches proposal to increase the provision of Extra Care units in Harrow. The proposal contributes to the Councils priorities for vulnerable people, the new vision for adult social care and affordable housing targets.  Increasing the supply of Extra Care housing for older people is a high priority to progress. There is very limited supply provision for affordable extra care schemes in Harrow and currently only a small pipeline. If the supply is delivered and is compared to the potential demand there is still a significant shortfall of around 200 units. This is particularly important in the context of an aging population, achieving good outcomes, increasing demand for services and budget challenges in local	Noted

<p>government.</p> <p>In addition, purpose built affordable rented wheelchair housing is in short supply and is a priority for provision.</p> <p>Average incomes in Harrow proportionate to the average price of market sale homes means that home ownership is out of reach for many local first time buyers including key workers. The shared ownership housing offers opportunities for local people to access affordable housing.</p> <p>The draft New London Plan significantly increases the 10 year target for net housing completions in Harrow 2019/20 – 2028/29, setting it at 13, 920. This equates (on a 40% basis) to 557 affordable units delivered per year. The Plan also contains an annual indicative benchmark for Harrow 2017-2019 for provision of specialist older persons housing, including extra care accommodation, to inform local level assessments of specialist housing need in the context of the total potential demand across London of over 4000 units. Harrow's indicative benchmark is 165.</p> <p>This scheme delivers 100% of the proposed units as affordable housing which will contribute meaningfully towards the challenging annual affordable housing target. In addition the scheme provides accessible housing of a high quality and inclusive design which meets the Mayors aspirations.</p> <p>For the reasons given above, Housing and Adults support the proposals.</p>	
<p><b><u>Head of Corporate Estates:</u></b></p> <p>No response received</p>	

## **5.0 POLICIES**

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that:
- 5.2 '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.'
- 5.3 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.
- 5.4 In this instance, the Development Plan comprises The London Plan 2016 [LP], the Draft London Plan (2017) and the Local Development Framework [LDF]. The LDF comprises The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan 2013 [AAP], the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan [SALP] 2013 and Harrow Local Area Map 2013 [LAP].
- 5.5 5.5 The Draft new London Plan was published on 29th November 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.
- 5.6 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.
- 5.7 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**

- 6.0.1 The main issues are:
- Principle of the Development
  - Affordable Housing and Housing Mix
  - Character and Appearance
  - Residential Amenity and Accessibility
  - Traffic, Parking, and Servicing
  - Drainage
  - Biodiversity
  - Energy and Sustainability



## 6.1 Principle of Development

- 6.1.1 The NPPF sets out policies and principles that local planning authorities should take into account, when both preparing local plans, and determining planning applications. The policies within the NPPF are a material consideration that should be given significant weight
- 6.1.2 At the heart of the NPPF is the presumption in favour of sustainable development. Under paragraph 7 it sets out three dimensions to sustainable development: economic, social and environmental. It goes on to state under paragraph 8 that these roles should not be taken in isolation as they are mutually dependant and thus to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life
- 6.1.3 In terms of decision making purposes, the presumption in favour of sustainable development means "approving development proposals that accord with an up to date development plan without delay or where there are no relevant development plan policies, or the policies are out of date, granting permission unless:
- the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development or
  - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole (Paragraph 11)

### *Housing Need including Extra Care Accommodation*

- 6.1.4 Paragraph 60 of the National Planning Policy Framework outlines that "To determine the minimum number of homes needed, strategic policies should be informed by local housing needs assessment. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes (paragraph 61).
- 6.1.5 London Plan policy (2016) 3.16 outlines the need for additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population. It states that "development proposals which provide high quality social infrastructure will be supported in light of local and strategic needs assessments...Facilities should be accessible to all sections of the community and be located within easy reach by walking, cycling and public transport". Further to this, 3.17 'Health and Social Care Facilities states that "proposals that provide high quality health and social care facilities will be supported in areas of identified need, particularly in places easily accessible by public transport , cycling and walking".

- 6.1.6 Table of The London Plan (2016) provides indicative strategic benchmarks to inform local targets and performance indicators for specialist housing for older people (including sheltered accommodation, extra care accommodation and nursing home care) between 2015 and 2025. The annual benchmark figure for Harrow is stated as 150 units. The draft New London Plan also contains an annual indicative benchmark for Harrow 2017-2019 for the provision of specialist older persons housing including extra care accommodation to inform local level assessments of housing need in the context of the total potential demand across London of 4, 000 units. The new figure for Harrow is set at 165 units per annum.
- 6.1.7 Policy H15 of the Draft London Plan makes clear that that sheltered accommodation and extra care accommodation is considered as being class C3. Such accommodation is designed to meet the needs and aspirations of older people (minimum age of 55 years and which provides 24 hour access to emergency support). Domiciliary care will be available to varying levels, either as part of the accommodation package or as part of additional services which can be purchased as required.
- 6.1.8 The Harrow & Wealdstone Area Action Plan Policy AAP4 sets high standards expected of development in terms of design and materials, residential quality, Secure by Design principles, and infrastructure including responses to climate change. Local plan policy DM 29 states that “ the Council will support proposals on previously developed land for sheltered housing, care homes and extra care housing (across all tenures) for older people and those who may be vulnerable, provided that the proposal is accessible by public transport with good access to local amenities including shops and local facilities”.
- 6.1.9 The proposal would provide, in part, self-contained living accommodation with ancillary supporting facilities and is considered to fall under Class C3 in accordance with the definition set out under policy H15 of the Draft London plan (2017).
- 6.1.10 The methodology for needs undertaken by Harrow Council (Adults and Social Care) includes the review of population projections, as assessment of potential needs that would be suitable for extra care as currently provided in Harrow, and further assessment of higher need that would be met through an enhanced model of higher care. It is outlined that the projections indicate that there would be between 150 to 225 clients suitable for extra care provision by 2025. This number could rise to 367 placements required by 2025 based on an enhanced model of care to address the needs of those with more serious health issues, including dementia. The figures are based on those individual who would be eligible for adult social care services and in receipt of housing benefit.
- 6.1.11 The accompanying evidence shows that there is currently a very limited provision for affordable extra care schemes in Harrow and only a small pipeline of other potential schemes. Currently the only affordable Extra Care scheme in Harrow is Harrow Churches Housing Association Ewart House scheme which provides 47 flats Even if the supply were to be delivered, there would still be a significant shortfall of around 200 units over the plan period.

- 6.1.12 Whilst there have been a number of other recent Extra Care Housing schemes approved in the borough, namely Jubilee House, Princess Alexandra and Buchanan Court, these are all for private provision, whereas the proposal would be 100% affordable, thereby satisfying a different housing need.
- 6.1.13 In light of the above evidence and outlined projected demand for the type of accommodation proposed, officers consider that the proposal would result in a significant contribution and public benefit to the need for older person housing and extra care accommodation.
- 6.1.14 The proposal would in part replace an existing care home facility, which falls short of current care home standards, given that the Care Quality Commission (CQC) have changed as the understanding of providing a satisfactory level of accommodation for occupiers of such a product has evolved. The proposed development will offer significant improvements over the existing accommodation in terms of accessibility and standards of care.
- 6.1.15 In addition, the proposal would provide 2 flats which would be fully wheelchair adapted, for affordable social rent to eligible tenants of any age. The proposal would also provide 20 flats for shared ownership. Overall, the scheme provides 100% affordable housing, serving a mix of tenures and needs.
- 6.1.16 It is acknowledged that the introduction of the building on the site would introduce a significantly greater density of development than currently exists, however this would be below the target thresholds of The London Plan. Given the siting within the Harrow & Wealdstone opportunity Area, London Plan density thresholds would normally be expected to be met. However, the development in this case would include significant areas of communal and service space to facilitate the functioning of the specialised living requirements of the majority of future occupiers. On balance, the density would therefore be acceptable.
- 6.1.17 The development is also in a reasonably sustainable location, notwithstanding the PTAL rating, with good access to Harrow Town Centre and Wealdstone Town Centre, which offer a range of shops, services and transport facilities. The development would therefore also accord with the aspirations of lifetimes neighbourhoods and would be in compliance with policies DM2 and DM 29 in this regard.

#### *Loss of Community Use*

- 6.1.18 A portion of the proposed site comprises the former Sea Cadets hall, and is currently allocated as Use Class D2. The loss of the D2 community use must therefore be justified, as per policy DM47 of the Harrow Development Management Policies (2013) and policy CS1.Z of Harrow's Core Strategy.
- 6.1.19 It appears that the Harrow Sea Scouts have now merged with Wembley Sea Scouts, but are still located within the Borough (Wealdstone). Notwithstanding this, it is the loss of circa 220sqm of community floorspace from this locality, which is sought to be resisted. However, DM47A provides avenues that would

allow a loss of such floorspace to be permitted. The submitted application is unable to comply with Policy DM47A(a), (b) or (c); but it would be considered to comply with DM47A(d).

- 6.1.20 The existing D2 floor space would be replaced as part of the larger proposed development, which would result in a scheme that offers 100% of the accommodation as an affordable product. This far exceeds the Borough wide target of 40%. Moreover, 74% of the housing would be provided as extra care accommodation, which would be offered at affordable rent. This exceeds the 60% (of the overall offer of affordable product) tenure split, which favours the affordable rented product that is identified within the Borough as being the most needed. This results in the remaining 26% being offered as shared ownership and as general accommodation. The typology of the accommodation shall be secured by way of a S.106 legal agreement
- 6.1.21 Given the identified need for the type of housing proposed, the net increase in units, the quality of the accommodation, and the 100% affordable nature of the product, it is considered that the proposed development would secure an overriding public benefit, as per DM4A(d).
- 6.1.22 In summary it is acknowledged that part of the development would result in a loss of existing community use land. It is considered, however, that on balance, taking account of all the above considerations, the provision of 100% affordable housing for Extra Care accommodation, specialised wheelchair-adapted accommodation, and shared ownership accommodation would be a significant public benefit which would outweigh the potential harm identified in section 6.5 in terms of increased parking stress. Overall the development would provide significant improvements in care services and overall affordable housing in a sustainable and appropriate location. For these reasons, officers consider that the principle of development is acceptable.

## 6.2 Affordable Housing and Housing Mix

- 6.2.1 Core Policy CS1J of the Harrow Core Strategy (2012) seeks the maximum reasonable amount of affordable housing on all development sites, with a Borough-wide target of 40%. DM policy 24 states that proposals that secure an appropriate mix of housing on site and which contribute to the creation of mixed and inclusive communities will be supported. Core Policy CS1 I outlines the need for a mix of housing in terms of type, size and tenure across the borough and within neighbourhoods in order to promote housing choice, meet local needs and to maintain mixed and sustainable communities. Policy AAP13 of the Harrow & Wealdstone Area Action Plan reinforces the standard for quality set out elsewhere, and seeks to secure a high level and suitable mix of housing types and tenures in the Opportunity Area.
- 6.2.2 The existing Watkins House facility contains 44 flats. The proposal will provide a total of 78 flats, with a net gain of 34 units overall. This development will provide 56 Extra Care units, 2 general needs wheelchair accessible units, and 20 shared ownership units. The units will be a mix of 1 and 2 bed flat (66 x 1b and 12 x 2b)

which are considered to be appropriate for the intended end user group. The extra care and wheelchair units will be designated as social housing for rent which can be secured by section 106 agreement. In addition, the extra care flats allow for reconfiguration to meet differing and changing needs of occupants over time.

- 6.2.3 The development will therefore assist in meeting both specialised and general housing need overall as well assisting with the Council's downsizing incentive where applicants currently live in Council owned accommodation which is too large for their needs.

### 6.3 Character and Appearance

#### *Scale, Mass and Layout*

- 6.3.1 As outlined in paragraphs 124 to 131 of the NPPF (2018), The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.
- 6.3.2 Policy 7.4 (B) of the London Plan requires that buildings, streets and open spaces should provide a high quality design response that has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass. Policy 7.6 of the London Plan (2016) outlines that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the widest quality materials and design it appropriate to its context. Buildings should have complimentary building materials, be of a proportion, composition, scale and orientation which enhances and defines the public realm.
- 6.3.3 The above design considerations are echoed in Draft London Plan (2017) Policy D1. This requires that development design should respond "to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types forms.
- 6.3.4 The existing Watkins House building is 3 storeys high when viewed from the lower ground level at the north of the site, and 2 storeys high when viewed at the higher ground level along Elmgrove Road. The proposal would be a 3 storey building at the lower northern end of the site, rising up to 5 storey in the south-east corner, with its massing concentrated towards Crystal Way and the industrial estate. The third floor would be set back from the main elevations to the north and west, closest to the existing residential houses, thus reducing bulk and shadowing impacts. The fourth and fifth floors would be limited to the shared ownership section of the building, and would be articulated with some set-backs.

- 6.3.5 The original proposals were submitted for a Design Review Panel process earlier in 2018, and changes to the height and relationship between the extra care and shared ownership sections of the building were made as a result, which enhances the connectivity of the communal garden areas and the landmark function of the building along Elmgrove Road. The proposed three-five storey building is considered to be appropriate in the surrounding context. The height is minimised along the northern and western boundaries, allowing for a transition in height from the two-storey dwellings to the corner of Elmgrove Road and Crystal Way where the new building forms a strong marker at the junction of these roads delineating the residential and industrial elements along this street. The building uses a complex form to help maximise housing units whilst retaining a sense of space around the edges of the site and with the existing neighbouring residences. The building has two endpoints which line up with the flanks of adjacent houses on Woodlands and Elmgrove Road. Although the building height would increase compared to the existing building, it is considered that sufficient space has been created with neighbouring properties (discussed in more detail under “Amenity”); that the bulk of the height has been appropriately concentrated towards Crystal Way; and the proposed form transitioning from 3 to 5 storeys with set-back sections at upper levels effectively deals with the additional height.
- 6.3.6 It is further considered that the maximum height of 5 storeys would be in keeping within the wider context of the area, which includes several other examples of buildings up to six storey along Elmgrove Road, Station Road, and the junction of Woodlands Road and Station Road. Having regard to the similar development in the local area, and the stepped heights along the rising ground levels of the site, the scale and massing of the proposed building is considered to be an acceptable response.

#### *Protected Views*

- 6.3.7 Policy DM 3 of the Harrow Development Management Policies Local Plan (2013) addresses protected views within Harrow. Policy DM 3 requires that development proposals should form an attractive element in their own right and preserve or enhance the viewer’s ability to recognise and appreciate the landmarks. The policy states that “development should not harm and, where possible, should make a positive contribution to the characteristics and composition of the protected views and their landmark elements.” It also outlines that opportunities to create new local views and vistas should be exploited through the design and layout of new development. Policy AAP6 notes that development in the Heart of Harrow should be of a scale consistent with surrounding development.
- 6.3.8 With regard to protected views, it is noted that a corner of the building is within the protected views corridor – however this section is only 3 storeys at the lower end of the site, and thus would not be considered harmful – while the site is within the wider protecting views setting corridor. Although the proposal would be higher than existing and then its immediate neighbours, in the context of the protected views setting, it would be viewed against buildings of equal or greater height sited closer towards the town centre. In addition, the majority of the

building would remain at a height of 4 storeys or less relative to ground level. It is not considered that the proposal would compromise protected views.

### *Design and Appearance*

- 6.3.9 As noted above, the bulk of the massing have been concentrated towards the Crystal Way and Elmgrove Road, and towards the industrial park. The urban design officer notes the final proportions of the 'end' block give much needed elongation; and that the building sits comfortably in the streetscape, and enough variations in material and balconies break up the mass sufficiently.
- 6.3.10 The building using geometric forms and changes a number of times, which allows it to model better to the site and adjacent residential buildings on Woodlands and Elmgrove Roads; while allowing the building to be read as a series of varied elements. The form of the balconies has been altered from previous iterations to help create a lighter feel, and these would be acceptable subject to high quality materials and detail design. The urban design officer also noted the slender vertical windows which help elongate overall proportions of the building.
- 6.3.11 The main proposed materials include light red multistock facing brickwork, aluminium cladding panels articulating transition areas, matching colour window frames, balcony balustrades and rainwater goods; glazed bricks around the entrance to the extra care area, decorative metal ventilation screens. Four styles of decorative brickwork to be used for additional interest in various sections; as well as providing additional ventilation around refuse storage and plants area, as well as glazed brick detail for emphasis at various entrances. These proposed details are considered appropriate in principle. It is considered necessary to ensure that the development is carried out to the standard promised in the application and that, as required by Local Plan policy, it maintains its attractiveness over the lifetime of the development. As such, a planning condition is recommended for the submission all detailed external materials and finishes for the buildings in order to ensure their proposed high quality appearance can be realised. Subject to this, it is considered that the proposed contemporary architecture will make significant positive contribution to the wider urban environment.

### *Trees and Landscaping*

- 6.3.12 Paragraph 127 of the NPPF states that planning decisions should aim ensure that developments are visually attractive as a result of, inter alia, appropriate landscaping. London Plan Policy 7.5 Public Realm seeks landscape treatment, street furniture and infrastructure of the highest quality and calls for opportunities for greening to be maximised. Policy DM22 Trees and Landscaping requires landscaping that: is appropriate to the character of the area; is well laid out; achieves a visual setting for buildings; provides sufficient space for planting to grow; and supports biodiversity.
- 6.3.13 Part of the site comprises landscaped amenity area associated with the existing care facility; whilst the Sea Cadets site is primarily paved, with self-seeding tees and overgrowth. The application is supported by an Arboricultural report which

identifies 38 individual trees on or immediately adjacent the cumulative site, with several proposed to be removed for the development. The report classifies 8 trees as being of moderate value (Cat B), 26 trees are of low moderate quality (Cat C) and 4 trees are unsuitable for retention, including a prominent willow tree towards the north-east corner of the site.

- 6.3.14 The proposal would retain some of the trees on site, notably the better quality lime trees along Elmgrove Road and at the rear of the site. The exact number to be retained required further clarification, however. Whilst the loss of trees to be removed is regrettable, in particular the large willow, it is considered that the impact of the proposed removal of trees would be minimal as the majority of trees across the site are of relatively poor quality, and the majority of the better trees would be retained. During construction phase, tree roots are proposed to be protected where paths and parking bays are positioned within tree root zones. Further details to this effect have been conditioned.
- 6.3.15 The application is also accommodated by an outline landscaping strategy, which proposes three communal garden areas. The main communal garden for the extra care facility would be sited along the eastern side of the building, and would include a patio area, pergola and planters. The northernmost garden would provide timber decking for walking and sitting, overlooking an “ecology garden” and flood basin with natural features of interests. The garden along the western side of the building would also have timber decking overlooking a flood basin with features of interests and a “sensory garden”. This garden would also have a separate section serving the shared ownership flats, and which would include children’s natural play equipment. The two sections of this garden would be at similar levels, allowing for visual and social contact between the occupants of the extra care and shared ownership units. Hard and soft landscaping would also be provided at all entrance areas.
- 6.3.16 The proposal would also include green roofs, discussed in more detail below. The Council Arboricultural Officer and Landscape Officer have confirmed that they are satisfied with the proposals, subject to securing final details on landscaping including implementation and replacement planting (if required) and suitable tree protection safeguards.

#### 6.4 Residential Amenity and Accessibility

- 6.4.1 NPPF requires sustainable development, and as part of this developments should aim to minimise adverse effects on the local environment, which includes neighbouring properties.  
7.6B, subsection D, of The London Plan (2016) states that new buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate
- 6.4.2 London Plan Policy 3.5 Quality of Design and Housing Developments sets out several criteria for achieving good quality residential development. The policy aims to ensure that developments enhance the quality of local places and create homes that reflect the minimum space standards and are fit for purposes in other



respects. The policy also provides a commitment that the Mayor will issue guidance on implementation of the policy, and this commitment is fulfilled by the publication of the Mayor's Housing SPG (2016). The SPG sets out detailed guidance on a range of matters relating to residential quality, incorporating the Secured by Design principles, and these form the basis for the assessment below

- 6.4.3 Policy DM1 of the Development Management Policies Local Plan (2013), which seeks to ensure that "proposals that would be detrimental to the privacy and amenity of neighbouring occupiers, or that would fail to achieve satisfactory privacy and amenity for future occupiers of the development, will be resisted". The Council's Residential Design Guide supplementary planning document is also relevant.

#### *Neighbouring Occupiers*

- 6.4.4 The proposed building would be sited to the east of properties on Woodlands Road and Elmgrove Road, and to the south of properties on Rosslyn Crescent. The overall design of the building utilises geometric shaping to bring large sections further away from the common boundaries with neighbouring properties, and to align the western ends of the building with the flanks of the adjoining houses off Woodlands Road and Elmgrove Road.
- 6.4.5 The adjoining houses Elmgrove Road (no. 56) and Woodlands Road (nos. 48 and 39) have flanks facing the proposed development site, and none of these properties appear to have "protected" habitable windows on the flank walls directly facing the development. Houses further along Elmgrove and Woodlands Roads have a similar orientation. The impacts of the development which should be considered are therefore on the forward and rear-facing windows of these properties, and on the rear elevation windows of adjacent properties on Rosslyn Crescent, and the rear gardens of all adjacent properties.
- 6.4.6 The proposal would meet the council's horizontal and vertical 45-degree test with respect to all adjacent properties, as set out in Harrow's Residential Design Guide SPD.
- 6.4.7 The applicant has submitted a Daylight & Sunlight Assessment prepared by Mecserve [Ref: P18-096]. The analysis found that, in relation to adjacent properties on Elmgrove and Woodlands Roads and Rosslyn Crescent, the proposal would meet BRE (Building Research Establishment) guidelines with respect to measurements of Vertical Sky Component, Annual Probable Sunlight Hours and Winter Probable Sunlight Hours, and overshadowing to gardens.
- 6.4.8 The proposal would include a terrace at the fourth floor which would be fitted with privacy screens to prevent overlooking onto neighbouring gardens. The 3<sup>rd</sup> floor western terraces would face towards the rear gardens of adjacent properties off Elmgrove and Woodlands Road and the service road between them. The distance from the terraces to the adjacent garden areas would be approximately 18m. Whilst 20m is often used as a standard guideline for acceptable distances between building flanks and amenity areas in sub-urban areas, this is a guideline

only rather than a requirement. The proposed distance of 18m is not considered to result in significant differences in impacts towards neighbouring amenities compared to a distance of 20m; and the proposal would therefore be considered acceptable in this respect. The remainder of the balconies are either more than 20m from boundaries of the site, are oriented at oblique angles to neighbouring properties to face the very rearmost section of the gardens with privacy screening provided, or do not face onto adjoining properties.

*Future Occupiers.*

- 6.4.9 The extra care facility will provide 56 flats, of which 9 would face north. Whilst the majority (47) would not be fully dual aspect, most of these (30) would utilise the geometry of the architecture to provide windows at various angles, thus increasing the opportunity to capture daylight and sunlight. 10 of the remainder would have a southern-western aspect. Those units with northerly facing aspect do include balconies/ patios with western open views, and 6 of those include angled windows. All flats will therefore receive direct sunshine during some part of the day given their facing layouts. Given the results of the Daylight and Sunlight report noted below, this is considered to acceptable, particularly as the majority of the units are 1 bed units which is required for this type of housing.
- 6.4.10 The applicant has submitted a Daylight & Sunlight Assessment prepared by Mecserve [Ref: P18-096]. The analysis found that, in relation to the proposed properties, the proposal would largely meet BRE (Building Research Establishment) guidelines with respect to measurements of Average Daylight and a clear view of the sky, Annual Probable Sunlight Hours and Winter Probable Sunlight Hours, with the remainder only marginally failing to meet some of these targets. Taken in conjunction with all relevant factors, however (e.g. minimum 2 hrs sunlight in winter), all units are considered to meet acceptable parameters for daylight and sunlight. All communal garden areas meet BRE standards with regard to overshadowing and sunlight.
- 6.4.11 The proposal uses the “HAPPI” principles of good design for older people (“Housing our Aging Population – Panel for Innovation”) for the development of the extra care facilities. Each unit will have their own private amenity space either in the form of patio garden or a balcony, as well as access to 500sqm of shared communal facilities, including guest rooms for visiting relatives, and multiple shared outdoor amenity spaces.
- 6.4.12 The shared ownership flats all have private amenity space and access to a communal garden and children’s play area. The proposed area meets the minimum space required by both the Mayor of London and Harrow’s Planning Obligations SPD. The wheelchair flats have private entrances but no private amenity marked out on the plans, but the matter can be addressed via a condition for revised plans indicating their location and size.

- 6.4.13 All units would either adhere to or exceed the minimum space standards and the corridors and circulation space would be fully accessible for wheelchair users

*Air Quality, Contamination, and Noise*

- 6.4.14 The application site does not have any known history of previous industrial uses, or other similar uses which would give rise to heightened concern regarding contaminants.
- 6.4.15 The application has been accompanied by a Combined Geotechnical and Ground Contamination Risk Assessment report, along with additional data reports and maps, and an Explosive Ordnance Desk Top Study. The Combined Geotechnical and Ground Contamination Risk Assessment report states that the site appears to be underlain by London Clay formation; and that substantial made ground and a void was recorded on the Sea Cadets site. A small amount of asbestos material was discovered, however the report considered that there would not be a significant risk from asbestos. Further investigation is recommended should further asbestos material be identified. Further investigation is also recommended to establish the extent of the void and presence of any buried structures on the Sea Cadet site.
- 6.4.16 The Explosive Ordnance study indicates a low risk of unexploded ordinance; however training measures for site staff are recommended to ensure safe handling should any be found.
- 6.4.17 The Crystal Centre Industrial Park is designated for Industrial/Business Use within Harrow's policy map. The original planning permission for this development indicates that the units are variously designated to be used only for light industrial purposes (Units B, C, F, G, H and J), light industrial plus related office (Unit K), or warehouse/distribution (Units A, D, & E).
- 6.4.18 The application has been accompanied by an Acoustic Assessment [Ref: 180909-R001A]. The survey of the existing area as detailed in the report notes that the daytime sound climate is low, primarily consisting of traffic, while the levels of noise from the industrial units was generally low, with some audible noise from extract machinery. Nonetheless, the report considers that the context of the proposal, which is bringing new residential to an area with existing industrial uses, reduces the likelihood of adverse impacts. The report provides recommended measures for façade sound insulation and mechanical ventilation, which it considers sufficient to mitigate noise vis-à-vis the proposed residential dwellings.
- 6.4.19 With respect to the communal and private outdoor amenity areas, it is acknowledged that the proposed mitigation measures would not address existing or future noise impacts from the industrial centre, which may change over time as different businesses come and go. The extra care facility has been provided with multiple communal garden areas, thus allowing residents choice and flexibility should noise result in short-term inconvenience. The shared ownership flats

which have amenity areas facing the industrial centre would also have recourse to a shared amenity area in such a circumstance.

- 6.4.20 As the Crystal Centre is a designated, protected industrial area, there is a possibility that in future, new businesses could come into the industrial centre which results in more or different noise impacts than those at present. Policy D12 of the Draft new London Plan introduces the “Agent of Change” principle, whereby a new incoming use should demonstrate that it would either not impinge on the future operations of existing uses, and should therefore provide adequate mitigation. The proposal has attempted to mitigate against such future changes through the above measures. Whilst this does not provide full mitigation with respect to the outdoor amenity areas, it is acknowledged that the proposal would largely replace existing residential on site, and would likely provide a higher quality of sound proofing than the existing building. Furthermore, it is noted that the original planning permission for the Crystal Centre would help limit the potential uses within the industrial area to largely those which would not be especially noxious in close proximity to residential uses.
- 6.4.21 With respect to air quality, the site is within a London Air Quality Management Area. The proposal would replace residential use and a vacant site with new residential units. The proposal itself would therefore not be expected to result in significant impacts on the surrounding air quality. The impacts of the nearby industrial units, given that these are restricted to light industrial and storage/distribution uses, would also not be expected to result in significant impacts in terms of air quality on future occupier of the site. It is noted that the condition to secure details of the landscaping could include plants which would, for example, serve as the most effective absorbers of CO<sub>2</sub>, to help provide a net benefit to the site.

#### *Secure By Design*

- 6.4.22 The proposal would activate the now-vacant Sea Cadets site, and given the siting for the new development would increase passive surveillance over the pedestrian link between Crystal Way and Rosslyn Crescent. This would help create an increased level of passive surveillance over this area, which would be of benefit to the nearby public realm.
- 6.4.23 The applicant’s submitted documents state that development would comply with AD Q of the Building Regulations. The developer has incorporated several of the security features recommended by the Designing Out Crime Officer prior to the submission, including lighting in key areas and secure entrances.
- 6.4.24 The Met’s Designing Out Crime Officer has reviewed the proposal, and has raised no objections. In accord with the DOCO’s advice, a condition is attached requiring the development to achieve Secure by Design accreditation.

## 6.5 Traffic, Parking, and Servicing

- 6.5.1 The NPPF sets out the overarching planning policies on the delivery of sustainable development through the planning system. It emphasises the importance of reducing the need to travel, and encouraging public transport provision to secure new sustainable patterns of transport use.
- 6.5.2 London Plan Policies 6.3, 6.9 and 6.13 seek to regulate parking in order to minimise additional car travel, reduce trip lengths and encourage use of other, more sustainable means of travel. The Parking Addendum to Chapter 6 of The London Plan sets out maximum parking standards for new development dependent upon their use and level of public transport accessibility. It is noted that at supporting paragraph 6A.3A to the Parking Addendum sets out that there is scope for greater flexibility to the parking standards in different parts of London having regard to patterns of car ownership and use, levels of public transport accessibility, the need for integrated approaches to on-site and off-street parking, efficiency in land use and overall impact upon environment and the transport network.
- 6.5.3 Development Management Policies DPD gives local interpretation of London Plan parking standards and detail requirements for sustainable Travel Plans. The document refers to the maximum London Plan standards for the parking standards of vehicles (including those with vehicle charging points) and cycle parking spaces. In addition, there would be “1 motorcycle/ scooter parking space per 20 car parking spaces subject to all developments with more than 10 car parking spaces having a minimum of 1 space”. Policies AAP19 and AAP20 of the Area Action Plan further fleshes out parking provision and standards, and the need to limit parking provision and support sustainable travel mode shift, as well as provision of green travel plans.
- 6.5.4 Woodlands Road is a quiet residential cul-de-sac, terminating at Watkins House; it is subject to a 24-hour CPZ. Elmgrove Road is a wider road which serves a larger area and greater flows of traffic, and Crystal Way serves the industrial estate. Both of these are subject to a daytime CPZ on Mondays to Saturdays. Paid parking bays are located on Crystal Way.
- 6.5.5 Currently there is available parking for up to 14 cars at the existing site. The site has a PTAL rating of 2 which is a “poor” accessibility rating as defined by TFL; although it is noted that a corner of the site lands within a PTAL 4, indicating the context of the site within a reasonably connected area. There is access to several bus routes within 350 metres walk of the site, with several shops and services along Station Road at a similar distance. Harrow & Wealdstone station (and town centre) is approximately a 12-15 minute walk away (1.015km distant). Harrow-on-the-Hill station and harrow town centre are 1.140km distant.
- 6.5.6 The proposal would result in a net increase in residential units of 34 from the existing. The existing vehicular and pedestrian access points from Woodlands and Elmgrove Roads would be retained, while a disused access off Crystal Way would be re-instated.

- 6.5.7 The proposal would provide for 21 parking spaces in total which equates to a provision of approximately 27%, and divided between the extra care facility / specialised wheelchair units, staff parking, and the shared ownership units. The applicants contend that this reflects the increasingly low car ownership rates of older people who are living in this type of social rented housing. 38% of the spaces will be wheelchair accessible parking bays, given 7 of the 78 flats are wheelchair accessible flats. A buggy storage area is also provided within the extra care building for up to 18 electric buggies/scooters.
- 6.5.8 The primary servicing area for the extra care facility would be off Crystal Way, which would be utilised for refuse collection and provides access to the plant services. This allows the servicing to be separated from the residents and visitors approach to the extra care facilities from Woodend Road. Refuse collection for the two wheelchair accessible flats, however, would be from Woodlands Road as per the existing houses. Refuse storage for the shared ownership flats is at the southern end of the building, and would be accessed off Elmgrove Road. Comments from Waste Management officers indicated a lack of clarity as to the exact location of the bin store, but this can be accessed directly off the forecourt so should be acceptable, and no further comments were received raising concerns about this point.
- 6.5.9 The access off Woodlands Road would include a turning area within the site. In addition, the proposal would require the provision of a service parking area off Crystal Way, to be formed by the suspension of two existing paid parking bays. The developer states that a fire consultant provided advice regarding fire escape plans for residents, as well as access and facilities for fire-fighting personnel.
- 6.5.10 The application is accompanied by a Travel Plan, Transport Statement, which consider how alternative modes of transport, reducing car travel will be achieved. The transport statement details a parking survey, which found high stress on some nearby roads, including Woodlands Road, but available capacity on others. Harrow's Highways department have reviewed the submitted documents and whilst there appear to be some minor errors within the Travel Assessment, the overall conclusion reached by the highways officers is that the proposal would have the potential to generate overspill parking levels in the area, which does include areas of high stress, as it is unknown what proportion of residents would be eligible for blue badge parking. Conversely, the site's location does mean that that access to shops, public transport and other amenities are all within relatively easy reach and the expectation that many residents would use electric buggies/scooters in favour of cars may be realised for this reason. Parking permit restrictions will be secured via a S106 agreement; and this will prevent all non-blue badge holders from obtaining permits for any CPZ. In addition, and the travel plan will seek to reduce car journeys.
- 6.5.11 The existing access points and vehicle crossings would remain as is and so would be considered acceptable. The re-instated access on Crystal Way may require enlargement or other works (which may require the permission of the Highways department), but is acceptable in principle as it is pre-existing.

- 6.5.12 The propose refuse servicing has not raised any objections from traffic officers, however it is noted that the access to the service areas off Crystal Way appear to be more than 10m from the boundary. This could be address by a condition for revised plans to re-locate the access to the waste storage to the eastern flank of the building.
- 6.5.13 The outline construction logistics plan is acceptable, however full details will need to be secured by condition.
- 6.5.14 The proposal does include cycle parking, however as per TfL's comments, the provision required under the Draft New London Plan is slightly higher than the current London Plan. As well, provision should be made for visitor and staff cycle parking, and accommodation for non-standard cycles. Such details can also be conditioned.
- 6.5.15 Subject to the above mentioned conditions and on-going monitoring of the travel plan which can be secured by a section 106 agreement, for the reasons outlined above the transport impacts of the proposal are considered to be acceptable, having regard to the aims and objectives of policy 6.3 of The London Plan, core policy CS 1 R of the Harrow Core Strategy, and policies DM 42 and 43 of the Harrow Development Management Policies Local Plan (2013).

## 6.6 Drainage

- 6.6.1 The NPPF (2018) outlines the need to manage flood risk from all sources. Policies 5.13, 5.12 and 5.14 of The London Plan seek to address surface water management and a reduction in flood risk. Policy 5.13 of the London Plan requires that proposals should achieve greenfield run off rates and ensure that surface water is managed as close to its source as possible in accordance with the sustainable urban drainage (SUDS) hierarchy. Policy DM 9 states that "proposals requiring a Flood Risk Assessment must demonstrate that the development will be resistant and resilient to flooding and the design and layout of proposals must contribute to flood risk management and reduction" Further to this, policy DM 10 of the Harrow Development Management Policies Local Plan (2013) requires that "proposals for new development will be required to make provision for the installation and management of measures for the efficient use of mains water and for the control and reduction of surface water run off. Substantial weight will be afforded to the achievement of greenfield run off rates". In addition, policy AAP9 of the Harrow & Wealdstone Area Action Plan further supports the needs for development to address current and future drainage needs,
- 6.6.2 Parts of the site lie within Harrow Strategic Flood Risk Area (SFRA) zones 3a and 3b, and the whole of it is within a critical drainage area. The application is therefore accompanied by a Flood Risk Assessment, as well as preliminary information indicating flood mitigation measures which would be incorporated into the development, such as flood basins being integrated into outdoor amenity areas. The Council's drainage engineers have reviewed the submitted information, and have raised no objection, subject to the imposition of conditions,

relating to surface water attenuation and storage works and details of disposal of sewage.

6.6.3 It is noted that an underground waterway (culvert) crosses the north-east corner of the site. Based on the assumed location of the culvert, the proposed building would be approximately 5m distant. Whilst this would be acceptable, should further works reveal that the actual location of the culvert is closer to the proposed building than currently believed, this would likely require additional permissions and precautions on the part of the developer. Should the culvert in fact be within 3m of the proposed building, however, the proposal may not be able to proceed as approved. The developer will therefore be proceeding at their own risk.

6.6.4 Subject to the above conditions, the development is considered to fulfil the objectives of the NPPF concerning managed impacts upon flood risk and would satisfy London Plan (2016) policies 5.12, 5.13 and 5.14, policy CS1 U of the Harrow Core Strategy and policy.

## 6.7 Biodiversity

6.7.1 Policies DM 20 and DM 21 seek to ensure the protection of biodiversity and access to nature. Policy DM 20 requires that “The design and layout of new development should retain and enhance any significant features of biodiversity value within the site. Potential impacts on biodiversity should be avoided or appropriate mitigation sought”. Policy DM 21 outlines that proposals should secure the restoration and recreation of significant components of the natural environment.

6.7.2 The application has been accompanied by a Preliminary Ecological Appraisal, and bat surveys. The studies make a number of recommendations which would allow for mitigation and/or improvement to the ecological value of the site for a range of species. In addition, a bio-diverse green roof is proposed for the lower levels. The details have been reviewed by the Council biodiversity officer who considers that some additional information and specific measures to ensure a net increase in biodiversity gain is required to ensure that the biodiversity enhancement value of the site can successfully be secured in perpetuity. Should planning permission be granted, appropriate planning conditions can be secured to address these issues.

6.7.3 Subject to conditions in respect of the above matters, officers consider that the ecological and aesthetic value of the area would not be significantly harmed and the development would thereby comply with policies 7.21 and 7.19 of The London plan (2016) and policies DM 20, 21 and 22 of the Harrow Development Management Policies Local Plan (2013).

## 6.8 Energy and Sustainability

6.8.1 The National Planning Policy Framework seeks to promote low carbon and renewable energy, including decentralised energy. This includes requiring local planning authorities to have a positive strategy to delivery low carbon and



renewable energy infrastructure and for these matters to be considered as part of any planning application.

- 6.8.2 London Plan Policy 5.2 (Minimising Carbon Dioxide Emissions) requires new development to minimise carbon emissions in accordance with the energy hierarchy of be lean (use less energy), be clean (supply energy efficiently) and be green (use renewable energy). The policy sets targets for carbon emission reductions; with residential development is expected to be zero carbon. 40% reduction required relative to the 2010 Building Regulations for both residential and non-residential development (this is equivalent to a 35% reduction over the more recent 2013 Building Regulations) is required to be achieved on site. The policy outlines that the remaining regulated carbon dioxide emissions, to 100%, are to be offset through a cash in lieu contribution to be ring fenced to secure the delivery of carbon dioxide savings elsewhere ( in line with policy 5.2 E).
- 6.8.3 The National Planning Policy Framework seeks to achieve sustainable development. London Plan Policy 5.3 requires that development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation. It outlines broad considerations that developments should address, including minimising carbon emissions, avoiding overheating, making the efficient use of resources, minimising pollution and the generation of waste, avoiding the impacts from natural hazards, ensuring developments are comfortable and secure, using sustainable materials and promoting and protecting biodiversity and green infrastructure.
- 6.8.4 Policy 5.7 (Renewable Energy) requires new development to provide a reduction in expected carbon emissions through on-site renewable energy, where feasible. The supporting text to the policy indicates there is a presumption that the reduction achieved through on-site renewable energy will be at least 20%.
- 6.8.5 Harrow & Wealdstone Area Action Plan policy AAP10 expects new development to prioritise existing or planned connections to district heating networks where feasible, or to ensure the development would facilitate future connections; as well as providing on-site heating and cooling facilities. Harrow Local Plan policy largely cross-refers to the London Plan requirements with respect to carbon emissions [see Core Strategy Policy CS1 (T), Policies DM12 Sustainable Design and Layout, DM13 Decentralised Energy, and DM14 Renewable Energy Technology. Policy AAP10 outlines the Council's ambition for future development of a district wide energy network in the opportunity area.
- 6.8.6 The application is accompanied by an energy strategy. Through implementation of the three step energy hierarchy outlined in the London Plan ( Be Lean, Be Clean, Be Green), the cumulative CO2 savings on the site are estimated to be 35% over Part L1A regulation baseline.
- 6.8.7 In accordance with London Plan Policy 5.6, investigation has been undertaken in relation to potential connection to a district heat network. The review has identified that there are no existing or proposed district heat networks in close proximity to the proposed development. However, an on-site energy centre with

a CHP is proposed for the scheme. In addition, given the site's location within the Harrow and Wealdstone Opportunity area, which has been identified by the Council as a strategic area for future provision of a district heat network, provision of preliminary infrastructure for future connection to such a system has been recommended.

- 6.8.8 Additional techniques deployed within the development include a high energy efficient design including the incorporation of high performance building fabric including thermal bridging, high efficiency building services systems for heating and cooling that would exceed part L standards, and low energy light fittings. Specific units that would be vulnerable to overheating will be fitted with additional screening. Higher level roofs will accommodate PV cells.
- 6.8.9 Whilst 35% of savings will be achieved on site, the London plan requires residential development proposals to be zero carbon. This was adopted from 2016 onwards. The additional amount not provided on site can be provided as part of a carbon off set contribution.
- 6.8.10 Paragraph 2.5.13 of the SPG states that the overall contribution should be calculated over 30 years, and to be charged at £60 per tonne. The energy statement outlines that in order to achieve zero carbon for the residential portion of the scheme, 38 tonnes per annum of regulated CO2 equivalent to 1142.3 tonnes over 30 years must be offset. This is calculated to be £68, 538 of required carbon offsetting. As such, it is recommended to secure this financial contribution through a section 106 agreement. The contribution would be used within the borough by the Council to by enhancing other community buildings or by improving infrastructure that would assist in reducing carbon outputs. Accordingly, subject to securing a planning obligation, it is considered that the proposed development would not conflict with the policies of the development plan.
- 6.8.11 A condition is recommended to ensure that the proposals detailed in the energy and sustainability assessment are implemented. Subject to this and the above mentioned obligation, the scheme is considered to comply with the development plan polices outlines above and is acceptable in energy and sustainability terms.

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

- 7.1 The existing Watkins House site is no longer adaptable or able to meet current demands for Extra Care housing. The overall combined comprehensive redevelopment of the Sea cadets and Watkins House sites would assist in the delivery of 100% affordable housing including extra care for which there is a demonstrable need. The loss of the now-vacant community use floor space at the Sea Cadets site is therefore outweighed by the substantial benefit of the extra care and affordable housing provision delivered by the proposed development. The development is within a sustainable location and the design reflects and responds to the topography and neighbouring development. Additionally, it has been found that there would be no detrimental impacts on the amenity of surrounding neighbouring occupiers, and that the likely adverse highways impacts arising from the development would, on balance, be acceptable. The development would result in landscape and ecological enhancements and would contribute towards the strategic objectives of reducing carbon reductions in the borough.
- 7.2 For all these reasons and weighing up the development plan policies and proposals and other material considerations, it is recommended that the planning committee make a resolution to grant planning permission, subject to the completion of a Planning Obligation under section 106 of the Town and Country Planning Act 1990 (as amended), and the following conditions.

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

### **Conditions**

#### **Watkins House P/4648/18 Draft Conditions:**

##### **General Planning Conditions**

1. Timing

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

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

2. Approved Plans and documents

Unless otherwise agreed in writing by the local planning authority, the development shall be carried out, retained and completed in accordance with the following approved drawings and documents:

207/PL13/P1; 207/PL11/P1; 207/PL12/P1; 207/PL01/P1; 2798-LA-02 Rev D; 207/PL102/P2; 207/PL103/P2; 207/PL104/P2; 207/PL105/P1; 207/PL106/P1; 207/PL300/P2; 207/PL108/P1; 207/PL109/P2; 207/PL110/P2; 207/PL111/P2;; 207/PL112/P1; 207/PL101/P1; 207/PL107/P1; 207/PL114/P1; 207/PL200/ P1; 207/PL201/P1; 207/PL202/P1; 207/PL100/P1; 207/PL113/P1; 207/PL10/P1; 0618-ASI-11602 Sheet 1 of 2; 0618-ASI-11602 Sheet 2 of 2 (Full Utility); Cover letter dated 16<sup>th</sup> October 2018; Affordable Housing Statement Part One Extra Care Housing dated October 2018; Letter from Head of Housing Regeneration and Divisional Director of People Services Strategy, dated 2 October 2018; Accommodation Management Plan – Extra Care Housing dated October 2018; Explosive Ordnance Desk Top Study for Project 18304 Woodlands Road [Ref: EOD/18/18304/DTS/Woodlands Road Harrow HA1 2RS]; Document listed Current Extra Care developments; Arboricultural Implications Assessment for Proposed Redevelopment dated 19<sup>th</sup> October 2018 [Ref: J54.97]; Nocturnal Emergence and Dawn Re-entry bat Survey dated October [Ref: RT-MME-129167]; Preliminary Bat Roost Assessment dated October 2018 [Ref: RT-MME-128778-02]; CIL Planning Application Additional Information Requirement Form; Outline Construction Logistics Plan dated October 2018; Daylight & Sunlight Assessment dated October 2018 [Ref: P18-096, Issue 02]; Design and Access Statement V1 dated October 2018; Preliminary Ecological Appraisal dated October 2018 [Ref: RT-MME-128778-01]; Affordable Housing Statement Part Two Shared Ownership Housing dated October 2018; Flood Risk Assessment & Drainage Strategy dated October 2018 [Ref: WIE14746-100-R-1-2-1-FRA]; Combined Geotechnical and Ground Contamination Risk Assessment dated 19<sup>th</sup> July 2018 [Ref: R18-13017/ds; Geo-Environmental Data and Historical maps dated 6<sup>th</sup> June 2018 {Ref: R18-13017/map} with Appendices; Heritage Assessment, Former Sea cadet's Site, Woodlands Road, Harrow, dated October 2018 [Ref: 00007 V.1]; Landscape Strategy dated October 2018 [Ref: 2798-RE-01 Rev E; Acoustic Assessment of a Proposed Residential Development at Watkins House, Harrow dated October 2018 [Ref: 180909-R001A] dated October 2018; Supporting Planning Statement dated October 2018; Energy & Sustainability Statement dated October 2018 [Ref P18-096, Issue No. 2]; Transport Assessment dated October 2018; Travel Plan Statement dated October 2018

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

## **Pre-commencement Conditions**

### **3. Demolition and Construction Logistics Plan (Pre-commencement)**

No development shall take place, including any works of demolition, until a detailed demolition and construction logistics plan has first been submitted to the Local Planning Authority in writing to be agreed. The plan shall detail the arrangements for:

- a) the parking of vehicles of site operatives and visitors;
- b) loading and unloading of plant and materials;
- c) storage of plant and materials used in construction the development;
- d) the erection and maintenance of security hoardings including decorative displays and facilities for public viewing;
- e) wheel washing facilities; 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
- i) consideration of the presence of St Jerome's Primary School at the junction of Station Road and Elmgrove Road, with deliveries to be timed to avoid the school start and finish times

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

REASON: To ensure that measures are put in place to manage and reduce noise and vibration impacts during demolition and construction and to safeguard the amenity of neighbouring occupiers, in accordance with Policies 7.14 and 7.15 of the London Plan (2016) and Policy DM1 of the 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). 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. This condition is a PRE-COMMENCEMENT condition as the proposed measures must be in place prior to commencement of works.

### **4. Trees 1 (Pre-commencement)**

The development hereby permitted shall not commence until there have been submitted to, and approved in writing by, the local planning authority, a site-specific tree protection plan and method statement based on the approved Arboricultural Implications Assessment for Proposed Redevelopment dated 19th October 2018 [Ref: J54.97], and to include:

- a) details / location of new drainage, underground utilities/services;
- b) details of no-dig in relation to new parking areas, driveways, and relevant sections through them; and
- c) details of site access, temporary parking, material storage, site hut etc.

The development shall be undertaken in accordance with the approved details, to be supervised on site by an Arboricultural Consultant. The tree protection measures shall be erected before any equipment, machinery or materials are brought on to the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition, and the ground levels within those areas shall not be altered, nor shall any excavation be made, without the written consent of the local planning authority. To ensure the development is constructed in a manner which safeguards

the trees on the site and that works do not impact on Root Protection Zones, this is a PRE-COMMENCEMENT condition.

REASON: To ensure that the trees to be retained on the site are not adversely affected by any underground works, in accordance with policy DM 22 of the Harrow Development Management Policies Local Plan (2013).

5. Documentation of Historic Features (Air raid shelters) (Pre-commencement on Sea cadets site)

No development shall take place within the Sea Cadets site area until the applicant, or their agents or successors in title, has secured the implementation of a programme of work to document the features and structures of archaeological interest on site, in accordance with a written scheme of investigation (to include photography, drawn measured survey and a better understanding of the connection with the Hamilton's through review of company archives) as circumstances dictate, which has been submitted to, and approved in writing by, the local planning authority. Once the programme has been approved by the Local Planning Authority, the final report thereafter produced should be submitted to the Greater London Historic Environment Record for their permanent record. This condition must be complied with within 12 months of the date of this approval. As the features of interest may be affected by initial demolition works, this is a pre-commencement condition.

REASON: To secure the provision of archaeological excavation and the subsequent recording of the remains in the interests of local heritage.

6. Biodiversity Protection (Pre-commencement)

No site works, including demolition, shall commence until a plan, detailing

- (a) the prevention of avoidable harm or disturbance to protected species, other wildlife and key biodiversity features to be deliberately retained or likely to be present on site; and
- (b) how these will be disseminated to and implemented by contractors and any sub-contractors, has been submitted to, and agreed in writing by, the local planning authority. All works undertaken shall be carried out in accordance with the details so agreed unless otherwise agreed in writing by the local planning authority.

REASON: To ensure that the development makes appropriate provision for the protection of biodiversity in accordance with policy 7.19 of The London Plan (2016), and policy DM20 of the Harrow Local Plan (2013).

**“Other than demolition works”**

7. 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, have been submitted to the Local Planning Authority in writing to be agreed. 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 DM 1, DM 10 and DM 42 of the Harrow Development Management Policies Local Plan (2013).

8. Surface Water Drainage Strategy

No development shall take place other than works of demolition until details of works for the disposal of surface water, including surface water attenuation and storage, have been submitted to the Local Planning Authority in writing and agreed. The submitted details shall include a Management Plan for disposal of ground water during construction phases, measures to prevent water pollution, full details of drainage layout including details of the outlet and cross section of proposed storage, any flow restrictions proposed, full details of SuDS including flood displacement storage levels for existing and lowered areas, and permeable paving/surfacing and their management and maintenance. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development achieves an appropriate greenfield run-off rate in this critical drainage area and to ensure that sustainable urban drainage measures are exploited, in accordance with London Policies 5.13 & 5.15 of the London Plan (2016) and built-in to the Policy DM 10 of the Harrow Development Management Policies Local Plan (2013). To ensure that measures are agreed and development to manage and reduce surface water run-off.

9. Foul Water Drainage Strategy

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

REASON: To ensure that there would be adequate infrastructure in place for the disposal of foul water arising from the development, in accordance with Policy 5.14 of the London Plan (2016) and Harrow Core Strategy Policy CS1, and to ensure that the development would be resistant and resilient to foul water flooding in accordance with Policy DM10 of the Harrow Development Management Policies Local Plan (2013). To ensure that measures are agreed and put in place to dispose of foul water arising from the development.

10. Culvert – if within 5m/3m

To be reported via addendum once the wording has been agreed with the applicant.

**Progression Point Conditions**

11. Cycle Parking Details and Amended Plans

Notwithstanding the details shown on the approved drawing, the development hereby permitted shall not progress beyond damp proof course level until revised details of the cycle parking spaces on the site have been submitted to the Local Planning Authority in writing to be agreed. The revised details shall include:

- a) A total of 35 secure, sheltered long-stay cycle parking spaces for the shared ownership units;
- b) One long stay and 3 short stay cycle parking spaces for the extra care units, as well as a minimum of 1 secure, sheltered long-stay cycle space for staff use;

- c) At that least 5% of the cycle parking spaces be designed for adopted/ cargo bikes in line with the LCDS, and provide shower and changing facilities for the staff of the extra care units;
- d) 1 motorcycle parking space;
- e) Access for waste storage adjacent Crystal Way re-sited to be within 10m of the boundary; and
- f) The private amenity areas for the 2 no. wheelchair adapted affordable rent flats.

The cycle parking shall be implemented on site for the sole use of the development in accordance with the details so agreed and shall be retained for the lifetime of the development. The provision of the private amenity area of the 2 no. wheelchair adapted units shall be put in place prior to the occupation of these units.

REASON: To ensure the satisfactory provision of safe cycle storage facilities, to provide facilities for all the users of the site and in the interests of highway safety and sustainable transport, and provision of satisfactory private amenity for future occupiers in accordance with policies 7.4B and 6.9B of The London Plan 2016 and policies DM27 and DM42 of the Harrow Development Management Policies Local Plan (2013).

## 12. Efficient Use of Mains Water Strategy

The development hereby approved shall not progress beyond damp proof course level until a strategy for the efficient use of mains water within the residential parts of the development, pursuant to a water consumption limit of 105 litres per person per day, has been submitted to, and agreed in writing by, the local planning authority. The development shall be carried out in accordance with the strategy so agreed and shall be retained as such thereafter.

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

## 13. Materials

Notwithstanding the details shown on the approved drawings, the development shall not progress beyond damp proof course level until samples of the materials (or appropriate specification) to be used in the construction of the external surfaces noted below have been submitted to the Local Planning Authority to be agreed in writing,:

- a) facing materials for the buildings;
- b) windows/ doors;
- c) balconies and terraces including privacy screens;
- d) boundary treatment including all pedestrian/ access gates; and
- e) ground surfacing.

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

REASON: To ensure that the development is carried out to the highest standards of architecture and materials in accordance with Policies 7.6 and 7.7 of the London Plan (2016) and Policy DM 1 of the Harrow Development Management Policies Local Plan (2013).



14. Window and Door Reveals

Notwithstanding the details shown on the approved drawings, the construction of the buildings hereby approved shall not commence beyond damp proof course level until there has been submitted to and approved in writing by the Local Planning Authority detailed sections at metric scale 1:20 through all external reveals of the windows and doors on each of the 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 that the development is carried out to the highest standards of architecture and materials in accordance with Policies 7.6 and 7.7 of the London Plan (2016) and Policy DM 1 of the Harrow Development Management Policies Local Plan (2013).

15. Extraction Flues, Ventilation Systems, Rainwater Disposal

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

REASON: To ensure that the development is carried out to the highest standards of architecture and materials in accordance with Policies 7.6 and 7.7 of the London Plan (2016) and Policy DM 1 of the Harrow Development Management Policies Local Plan (2013).

16. Combined Heat and Power Flue Details

The development hereby approved shall:

- a) Not progress beyond basement level until detailed specification and drawings of the combined heat and power plant and the external part of the flue, have been submitted to, and agreed in writing by, the local planning authority. The details submitted shall demonstrate compliance with the Mayor's SPG for sustainable design and construction in terms of emissions and shall include any noise mitigation as so required.
- b) The combined heat and power plant shall be installed and thereafter retained in accordance with the specification so agreed, and the post installation noise/ emissions testing shall be carried out in accordance with the arrangements so agreed.
- c) In the event that the local planning authority does not approve the test results, such remedial action as shall be specified in writing by the local planning authority shall be carried out no later than a date as shall be specified in writing by the local planning authority.

REASON: To ensure that the combined heat and power system comply with the standards published in the Mayor of London's Sustainable Design & Construction supplementary planning guidance (2014) (or such appropriate standards as may supersede them).

## 17. External Lighting

The development hereby approved shall not progress beyond damp proof course level until details of the lighting of all external areas (including buildings) within the site, including locations, lighting design, lighting details, specification, elevations, light spillage and lighting levels has been submitted to the Local Planning Authority in writing to be agreed. 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 Policies DM 1 and DM 2 of the Harrow Development Management Policies Local Plan (2013) and to ensure that the development does not unduly impact on the biodiversity potential of the site in accordance with policy DM 20 of the Harrow Development Management Policies Local Plan (2013).

## 18. Hard and Soft Landscaping Details

The development hereby approved shall not progress beyond damp proof course level until the following details have been submitted to, and agreed in writing by, the local planning authority:

- a) A scheme for detailed hard and soft landscaping of the development, to include details of the planting, hard surfacing materials, raised planters and external seating. Soft landscaping works shall include: planting plans (at a scale not less than 1:100), written specification of planting and cultivation works to be undertaken and schedules of plants, noting species, plant sizes, plant container sizes (all at time of planting) and proposed numbers / densities and an implementation programme. Planting which may provide benefits in terms of improving air quality are encouraged. The hard surfacing details shall include samples to show the texture and colour of the materials to be used and information about their sourcing/manufacturer. The hard and soft landscaping details shall demonstrate how they would contribute to privacy between the approved private terraces and the public pedestrian route, and communal garden/open space areas;
- b) Full scale metric cross sections and elevations for all communal open amenity spaces (at a scale of not less than 1:100) including the proposed details for the level changes, any timber decking level changes (if this proposed material is to be installed or alternative hard landscape level changes) and retaining walls. Details of levels for the retaining walls, gabion walls, with proposed levels along the wall lengths, at top and toe of retaining walls
- c) Details of all the proposed wooden decking including safety / non-slip qualities, of all furniture, boundary treatment, specification for the proposed supports and fixings for plants, pergolas and living wall / climbing plant frames, steel pergola / slatted brise soleil fins, including proposed material and source and irrigation for plants and detailed drawings of such; details of the ornamental perforated metal grate and suspended metal walkway to flood channel areas to all communal areas, raised beds and bespoke furniture, retaining and gabion walls, with construction detail and levels along the wall lengths at top and toe of retaining walls;
- d) Green roof hard and soft landscape details and planting plans, with PV panels to be incorporated into the green roof areas where feasible, including written specification of the planting and the biodiverse roof details, planting plans, and associated features (e.g. invertebrate shelters), and maintenance and proposed ongoing plant replacement, for any plant failures, during the lifetime of the built development;

- e) Details of the proposed rain garden/s (if proposed)
- f) A specification of all natural type play equipment to be installed including if proposed, any specific specification of the surface treatment within the play areas

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

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes to the creation of a high quality, accessible, safe and attractive public realm; to ensure a high standard of design, layout and amenity and to make appropriate provision for the protection, enhancement, creation and management of biodiversity within the Heart of Harrow, in accordance with policy 7.4B of The London Plan (2016), policy CS.1B of the Harrow Core Strategy (2012) and policies DM 1 and DM 22 of the Harrow Development Management Policies Local Plan (2013).

#### 19. Net Gain for Biodiversity and the Environment:

The development hereby approved shall not progress beyond damp proof course level until a detailed and time-bound plan for the delivery of net biodiversity gain and net environmental gain in connection with the development has been submitted to, and agreed in writing by, the local planning authority. This should either

- (a) show the measures taken in implementing the development proposals incorporating the conditions above will self-evidently provide biodiversity and environmental gain, or
- (b) provide a formal assessment of the biodiversity value of all habitat on the development site and any area affected by it, (i) at the time of the Preliminary Ecological Assessment and (ii) within 5 years of the completion of the development, e.g. using the latest version of the Defra biodiversity metric to provide at least a ten per cent uplift in their overall biodiversity value relative to what exists on site at present. Requisite gains shall be delivered wholly or partly on site, the remainder to be otherwise secured via Section 106 agreement in its near vicinity or at some strategic offset site within the borough.

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

REASON: To ensure that the development makes appropriate provision for the protection, enhancement, creation and management of biodiversity within the Heart of Harrow, in accordance with policy 7.19 of The London Plan (2016), and policies DM20 and DM21 of the Harrow Local Plan (2013) and the Harrow Biodiversity Action Plan (2015).

#### 20. Bird Bat and Invertebrate Boxes

The development hereby approved shall not progress above first floor level until proposals for provision of roosting/breeding shelters for bats and a mix bird species (particularly house sparrow, starling, robin/blackbird, tit species and swifts) using 'woodcrete' or equivalent materials - in numbers, appropriate to the scale of the proposal, and artificial invertebrate shelters within the site and/or building exteriors have been submitted in writing to be agreed by the Local Planning Authority, to include provision of the required numbers, locations, specification of bat boxes, bird boxes and invertebrate shelters boxes (all to be permanently built in to the building exteriors wherever practicable).

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

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

accordance with Policy 7.19 of The London Plan (2016) and Policy DM 22 of the Harrow Development Management Policies Local Plan (2013).

#### 21. Ecological Management Plan

The development hereby approved shall not progress beyond damp proof course level until detailed proposals for ongoing management, monitoring and reporting of onsite biodiversity features (including wildlife shelters and living roof areas), including details of how this will be funded in perpetuity have been submitted and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the proposals so agreed and shall be retained as such thereafter.

REASON: To ensure that the development makes appropriate provision for the protection, enhancement, creation and management of biodiversity within the site and surrounding area in accordance with Policy 7.19 of The London Plan (2016) and Policy DM 22 of the Harrow Development Management Policies Local Plan (2013).

### **Pre-Occupation Conditions**

#### 22. Revised Travel Plan

The development hereby permitted shall not be occupied until there has been first submitted to, and approved in writing by, the local planning authority a revised full Travel Plan to include targets to promote modal shift towards active travel. Details should include:

- a) Travel plan background and policies;
- b) Site Audit;
- c) Proposed development description;
- d) Clear objectives;
- e) Management – Provide a TPC in 3 months prior first occupation and contact details submitted to the council;
- f) A baseline survey should be undertaken within 6 months of first occupation of 75% of occupation, whichever ever come first;
- g) Targets should be in agreement with the council after the baseline survey;
- h) Measures – initiatives that will be introduced to achieve the targets;
- i) Funding – expression of commitment from the developer that the travel plan will be secured through its life;
- j) Monitoring and review – monitoring surveys should be undertaken at years 1, 3 and 5 and review reports submitted to the council within 1 month after the surveys; and
- k) A comprehensive action plan.

The travel plan shall be implemented as agreed unless otherwise agreed in writing by the local planning authority.

REASON: To promote sustainable modes of travel for the future occupiers of the development, in accordance with Policy 6.9 of the London Plan (2015) and Policy DM 43 of the Harrow Development Management Policies Local Plan (2013).

23. Acoustics Measures

The development hereby approved shall not be occupied until the measures for the acoustic insulation and ventilation of the flats detailed in the Acoustic Assessment dated October 2018 [Ref: 180909-R001A] submitted with the application have been implemented in full.

REASON: To ensure that potential adverse noise impacts to residential premises within the development are mitigated, and to ensure a high standard of amenity for future occupiers.

24. Implementation of Hard and Soft Landscaping

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

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

25. Landscape Maintenance

The development hereby approved shall not be occupied until a scheme for the on-going management and maintenance of the hard and soft landscaping within the development, to include a landscape management plan for the whole of the proposed development, including long term design objectives, management responsibilities and maintenance schedules for all landscape areas, including the ground level hard and soft landscape, green roofs and green living wall structure and pergola structures for plant growth and a programme of maintenance / plant replacement for the life time of the development specifically for the living walls structures / pergolas and green roofs, has been submitted to the Local Planning Authority in writing to be agreed,. The development shall be carried out in accordance with the scheme so agreed and shall be retained as such thereafter.

REASON: To safeguard the appearance and character of the area, and to enhance the appearance of the development. To ensure that the development makes provision for hard and soft landscaping which contributes (i) to the creation of a high quality, accessible, safe and attractive public realm and (ii) to the enhancement, creation and management of biodiversity within the Heart of Harrow, in accordance with Policies DM22, AAP7 and AAP12 of the Local Plan (2013), and to ensure a high standard of design, layout and amenity in accordance with Policy DM1 of the Local Plan.

26. Parking Management Plan

The development hereby approved shall not be first occupied until a parking management plan has been submitted to, and agreed in writing by, the local planning authority. The plan shall make provision for:

- a) details of how the parking spaces would be managed and allocated (residential and staff), including any enforcement procedure for any unauthorised parking on the site; and
- b) identify the electric vehicle charging point spaces that are to be provided within the basement car park as 'active' spaces (minimum 20%) and those as 'passive' spaces.

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

REASON: To ensure that the development provides sufficient parking and electric vehicle charging points, in accordance with London Plan Policies 6.13 and Local Plan Policy DM 42, and contributes to the achievement of a lifetime neighbourhood in accordance with London Plan Policy 7.1 and Policy DM 2 of the Local Plan (2013).

27. Designing Out Crime

Prior to the first occupation of the development, evidence of Secured by Design Certification shall be submitted to the Local Planning Authority in writing to be agreed, or justification shall be submitted where the accreditation requirements cannot be met. Secure by design measures shall be implemented where practical and the development shall be retained in accordance with the approved details.

REASON: In the interests of creating safer and more sustainable communities and to safeguard amenity by reducing the risk of crime and the fear of crime, in accordance with Policies 7.3 and 7.13 of the London Plan (2016) and Policy DM2 of the Local Plan (2013), and Section 17 of the Crime & Disorder Act 1998.

28. Telecommunications Equipment

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 approved in writing by the Local Planning Authority. Such details shall include the specific size and location of all equipment. The approved details shall be implemented prior to the first occupation of the relevant 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), 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).

## Other Conditions

### 29. Energy and Sustainability

The development shall be undertaken in accordance with the Energy & Sustainability Statement. Within 3 months (or other such period agreed in writing by the Local Planning Authority) of the final completion of the development a post construction assessment shall be undertaken demonstrating compliance with the approved Energy & Sustainability Statement by Mecserve dated October 2018 [Ref P18-096, Issue No. 2], which thereafter shall be submitted to the Local Planning Authority in writing to be agreed the Local Planning Authority for written approval.

REASON: To ensure the delivery of a sustainable development in accordance with the National Planning Policy Framework 2012, policies 5.2.B/C/D/E of The London Plan (2016) and policies DM 12, DM 13 and DM 14 of the Harrow Development Management Policies Local Plan.

### 30. Refuse Bins

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

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

### 31. Plant Noise Levels

The rating level of noise emitted from any plant, machinery and equipment on the site, shall be lower than the existing background level by at least 10 LpA. Noise levels shall be determined at one metre from the boundary of the nearest noise sensitive premises. The measurements and assessments shall be made in accordance with BS 4142:2014. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which the plant is or may be in operation. Before any plant is used, measurements of the noise from the plant must be taken and a report / impact assessment demonstrating that the plant (as installed) meets the design requirements, shall be submitted to the Local Planning Authority in writing to be agreed be approved in writing by the Local Planning Authority.

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

### 32. Trees 2

The completed schedule of site supervision and monitoring of the approved protection measures to be submitted to the LPA within 28 days from completion of development. This condition may only be discharged on completion of the development and subject to evidence of compliance with of the approved tree protection details

REASON: The existing trees represent an important amenity feature which the local planning authority considers should be protected, and as required by policy DM 22 of the Harrow Development Management Policies Local Plan (2013).

33. Wheelchair Accessible and Wheelchair Adaptable Homes

A minimum of 10% of the shared ownership units shall be built in accordance with Building Regulation standard M4 (3) 'Wheelchair User Dwellings'. All other residential units in this development shall be built in accordance with Building Regulation standard M4 (3) 'Wheelchair User Dwellings' and/or Building Regulation Standard M4 (2) 'Accessible and adaptable dwellings' as detailed in the submitted and approved drawings. The development shall be thereafter retained to those standards

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), Policy DM 2 of the Harrow Development Management Policies Local Plan (2013) and the Council's adopted Supplementary Planning Document: Accessible Homes (2010).



## **Informatives**

### 1. **Policies**

#### SUMMARY OF REASONS FOR GRANT OF PLANNING PERMISSION:

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

#### **2016 London Plan (2016)**

Policies 2.13, 3.1, 3.3, 3.4, 3.5, 3.6, 3.8, 3.10, 3.11, 3.13, 3.16, 4.12, 5.1, 5.2, 5.3, 5.5, 5.6, 5.7, 5.9, 5.10, 5.11, 5.12, 5.13, 5.18, 6.1, 6.3, 6.9, 6.10, 6.11, 7.1, 7.2, 7.3, 7.4, 7.6, 7.14, 7.15, 7.19, 8.2, 8.3

#### **Draft London Plan December 2017:**

Policies GG1, SD1, D1, D2, D3, D12, S1, S2, H7, H15, G5, G6, G7, SI2, SI3, SI5, SI7, SI12, SI13, T1, T3, T4, T5, T6

#### **Harrow Core Strategy (February 2012)**

Core Policies CS1, CS2

#### **Harrow & Wealdstone Area Action Plan (2013)**

Policies AAP4, AAP5, AAP6, AAP7, AAP9, AAP10, AAP11, AAP12, AAP13, AAP19, AAP20,

#### **Harrow Development Management Policies (July 2013)**

Policies DM1, DM2, DM3, DM9, DM10, DM12, DM13, DM14, DM19, DM20, DM21, DM22, DM23, DM24, DM27, DM28, DM29, DM42, DM43, DM44, DM45, DM47, DM50

#### **Other Guidance**

##### **Mayor of London Guidance**

Social Infrastructure (May 2015)

Sustainable Design and Construction (April 2014)

Mayor of London, Housing Supplementary Planning Guidance (March 2016)

Mayor of London Play and Informal Recreation Supplementary Planning Guidance (September 2012)

## **LB Harrow Guidance**

Council's Code of Practice for the Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (February 2016)

Planning Obligations & Affordable Housing SPD (October 2013)

Access for All SPD (April 2006)

Supplementary Planning Document - Accessible Homes (2010)

Supplementary Planning Document: Residential Design Guide (2010)

### **2. INFORMATIVE: CIL**

Please be advised that approval of this application (either by Harrow Council, or subsequently by PINS if allowed on Appeal following a Refusal by Harrow Council) will attract a liability payment of £636,475 of Community Infrastructure Levy. This charge has been levied under Greater London Authority CIL charging schedule and s211 of the Planning Act 2008.

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

Your proposal is subject to a CIL Liability Notice indicating a levy of £247,485 for the application, based on the levy rate for Harrow of £35/sqm and the stated increase in floorspace of 3857sqm (C3 use)

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

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

### **3. INFORMATIVE: Harrow CIL**

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

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

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

Retail (Use Class A1), Financial & Professional Services (Use Class A2), Restaurants and Cafes (Use Class A3) Drinking Establishments (Use Class A4) Hot Food Takeaways (Use Class A5) - £100 per sqm

All other uses - Nil.

The Harrow CIL contribution for this development is £777,810

4. LBHPC 04 Adjacent to Ordinary Watercourse: Under the terms of the Water Resources Act 1991, and Harrow Land Drainage Bylaws, the prior written consent of the LB Harrow is required for any proposed works or structures in, under, over or within 5 meter buffer zone of the of the designated 'Ordinary Piped Watercourse'. The applicant can contact the Harrow Infrastructure Team for further information: [infrastructure@harrow.gov.uk](mailto:infrastructure@harrow.gov.uk)
5. The applicant is advised that sewers works belonging to Thames Water are present or close to the site; and that the proposed development is located within 15m of Thames Water underground waste water assets. The applicant is advised to consult relevant Thames Water guidance and/or contact Thames Water directly to avoid damage to existing assets. The applicant is further advised that separate consent from Thames water will be required to connect to sewers; and that a sequential approach to the disposal of surface water would be required to be demonstrated. More information can be found at: [www.developerservices.co.uk](http://www.developerservices.co.uk)
6. The applicant is advised that a Groundwater Risk Management Permit will be required for discharging groundwater into the public sewer. Any discharge made without such a permit may be deemed illegal.
7. The applicant is advised that the development is subject to a limitation on a discharge to no more than 5 l/s/ha from all impermeable areas, consequently there will be a storage implication and the system should be checked for no flooding for a storm of critical duration and period of 1 in 100 years. These storage calculations should include all details of inputs and outputs together with impermeable and permeable areas drained. Please note that the M5-60(mm) is 21 and the Ratio "r" should read 0.43 for this region. Similarly the Volumetric Run-off Coefficient should be substantiated by calculations (Reference to Chapter 13 of The Wallingford Procedure) or a figure of 0.95 should be used for winter and summer. Please note that a value for UCWI of 150 is appropriate when calculating Percentage Runoff (PR) for storage purposes. Please include 40% allowance for climate change. Proposals must comply with the councils Local Flood Risk Management Strategy.
8. INFORMATIVE: Contaminated land may be an issue when constructing residential accommodation on brown field land. Even where contaminative risks may have been considered, remediation may have been inadequate to meet current standards. If a site is subsequently determined to be "contaminated land" under the contaminated land regime, developers may be liable for clean-up costs, even if the site is no longer in their ownership. Contaminated land may represent a threat to public health. The main risks are potential exposure during any demolition/construction works, and potential exposure of future residential occupiers. The most likely potential threat to residential occupiers would arise if they are exposed to contact with contaminated ground, though use of communal or private soft landscaping or gardens. However, some types of ground contamination can cause release of soil gases which can

percolate into buildings. Therefore the Council advises developers to consider such potential risks. In cases where such risks are identified developers are advised to carry out a desktop study for potential land contamination followed up by further investigations and, if necessary, remediation.

9. It is recommended that the applicant implement in full the measures for the training of site staff regarding safe site management and handling of unexploded ordnance detailed in the Explosive Ordnance Desk Top Study for Project 18304 Woodlands Road [Ref: EOD/18/18304/DTS/Woodlands Road Harrow HA1 2RS] submitted with the application.
10. The applicant is advised that the pre-existing vehicle crossing may require additional works to be brought back into use; and that any alterations to existing/pre-existing crossings will require separate agreement (s50 agreements) directly with Highway Network Management. Any new crossing construction should be constructed in line with Harrow's New Vehicle Crossing Policy, dated September 2017. A Temporary and/ or Permanent Traffic Order will be required. Please contact the Vehicle Crossings Team on [VehicleCrossings@harrow.gov.uk](mailto:VehicleCrossings@harrow.gov.uk) for further details/estimate.
11. The applicant is advised that early engagement with the Highway Network Management team is necessary to assist with preparation of the full CLP: Email [nrswa@harrow.gov.uk](mailto:nrswa@harrow.gov.uk)
12. INFORMATIVE: The applicants attention is drawn to the London Cycle Design Standards which can be found at: <http://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf>
13. The final report produced documenting historical artefacts on site should be submitted to the Greater London Historic Environment Record for their permanent record. The GLHER contact details are: The GLHER, The 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA and [glher@HistoricEngland.org.uk](mailto:glher@HistoricEngland.org.uk)
14. INFORMATIVE: Wheelchair Homes  

The applicant is encouraged to liaise with the Council during the construction of the development to ensure, insofar as possible, that the wheelchair homes are fitted-out to meet the needs of their first occupiers
15. INFORMATIVE: 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.
16. INFORMATIVE: The Party Wall etc. Act 1996 requires a building owner to notify and obtain formal agreement from adjoining owner(s) where the building owner intends to carry out building work which involves:
  1. work on an existing wall shared with another property;
  2. building on the boundary with a neighbouring property;

3. excavating near a neighbouring building, and that work falls within the scope of the Act. Procedures under this Act are quite separate from the need for planning permission or building regulations approval. "The Party Wall etc. Act 1996: Explanatory booklet" is available free of charge from: Communities and Local Government Publications, PO Box 236, Wetherby, LS23 7NB.

Please quote Product code: 02 BR 00862 when ordering. Also available for download from the CLG website:

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

Tel: 0870 1226 236, Fax: 0870 1226 237, Textphone: 0870 1207 405, E-mail: [communities@twoten.com](mailto:communities@twoten.com)

17. **INFORMATIVE: IMPORTANT: Compliance With Planning Conditions Requiring Submission and Approval of Details Before Development Commences**

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

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

18. **PRE APPLICATION ADVICE: Statement under Article 35(2) of The Town and Country Planning (Development Management Procedures) (England) Order 2015**

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

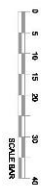
# APPENDIX 2: SITE PLAN



Ordnance Survey (© Crown Copyright, 2016. All rights reserved. Licence number: 10002432

- Notes**
1. Do not scale from the drawing. All dimensions are indicated on the drawing.
  2. This drawing is for planning purposes only. Any dimensions and levels shown are indicative only and should not be used for construction purposes.
  3. The drawing is for planning purposes only. It should not be used for construction purposes without the permission of the architect.
  4. The drawing is for planning purposes only. It should not be used for construction purposes without the permission of the architect.

— Planning Application Boundary



PLANNING PERMISSION SUBMITTED: 18. 09. 2018  
 MADE PUBLIC: 20. 09. 2018

**T M A T C H I E C T S**  
 Studio 016 Sheppards | 22 Highbury Grove,  
 London N6 2EF | T: 020 3597 1998

Watkins House  
 Woodlands Rd HA1 2RS

**Site Block Plan**  
 As Existing  
 Scale 1:100 @ A3

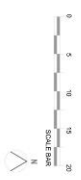
DATE: 2018  
 DRAWN: PL01 / P1

Existing Site Plan



- Notes**
1. The red outline form the drawing of annotations are not intended to be construed as a boundary.
  2. The drawing is for information only. Any dimensions are for information only. Any subject to detailed structural and architectural drawings.
  3. The drawing is for information only. Any dimensions are for information only. Any subject to be reproduced without the permission of the architect.
  4. The drawing and notes are approximate only. Based on information provided by the client. Subject to necessary changes. Shown as a guide and subject to necessary changes.

— Red line —  
Painting Application Boundary



PLANNING AND CONSTRUCTION SITE VISIT REPORT  
 DATE: 12/11/2018  
 TIME: 10:00 AM  
 DRAWN BY: [Name]  
 CHECKED BY: [Name]

**TM Architects**  
 Studio Old Sparrowwood 1211 Highway 200, West  
 Vancouver, BC V6V 1Y1 | 604.277.7555

Watkins House  
 Woodlands Rd HA1 2RS

**Site Block Plan**  
**As Proposed**  
 Scale: 1:250 @ A1:1:500 @ A2

2017 / PL100 / P1

Proposed Site plan

## **APPENDIX 3: SITE PHOTOGRAPHS**

Sea Cadets Site:







No. 39 Woodlands Road

Watkins House site from Woodlands Road:





With no. 48 Woodlands Road



Car parking area



Existing waste storage area



View towards Crystal Way – north-eastern part of curtilage

Watkins House site from Elmgrove Road:



With no. 56 Elmgrove Road







Watkins House site from Crystal Way:





Pre-existing access point



Access to

pedestrian path

Watkins House site Internal Garden Area





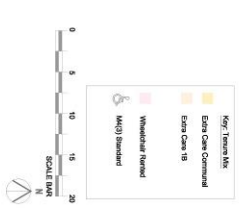


# APPENDIX 4: PLANS



Level 00 Plan

**TM Architects**  
 Studio 005 Sowerwicks 122 Highbury Grove,  
 London N5 2ZF | T: 020 3587 1858  
 Woodlands Rd HA1 2RS  
**Watkins House**  
**Level 00 Plan**  
**As Proposed**  
 Scale 1:200 @ A1:1500 @ A3  
 2017 / PL101 / P1



**Notes**

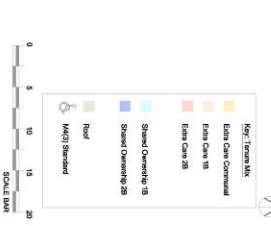
1. Do not scale from this drawing. All dimensions are minimum dimensions unless otherwise stated.
2. This drawing is for planning purposes only. Any dimensions and levels shown are indicative only and are not to be used for construction purposes.
3. Copyright Tameside Metropolitan Borough Council. This drawing is to be reproduced without the permission of the Council.
4. All areas and sites are approximate only, based on Ordnance Survey data only and subject to measured surveys.

Level 00 (ground floor of extra care) with curtilage



Level 01 Plan

- Notes**
1. Do not scale from the drawing. All dimensions are given in millimetres. Any dimensions not shown are to be taken from the drawings and have data an indicative only and should not be used for construction purposes.
  2. This drawing is for planning purposes only. Any dimensions and levels shown are indicative only and should not be used for construction purposes.
  3. All dimensions and levels shown are indicative only and should not be used for construction purposes. The drawings are not to be reproduced without the permission of the architect.
  4. This drawing is for planning purposes only. It is based on Ordnance Survey data only and subject to measured survey.



PLANNING APPLICATION SUBMISSION No. 2018/0111  
 REFERENCE: 2018/0111  
 NAME: CHALTON HOUSE  
 DATE: 28/01/2018

**T M Architects**  
 Studio 005 Sirenamarks | 221 Highlan Green,  
 London N6 2EF | T: 020 3597 1898

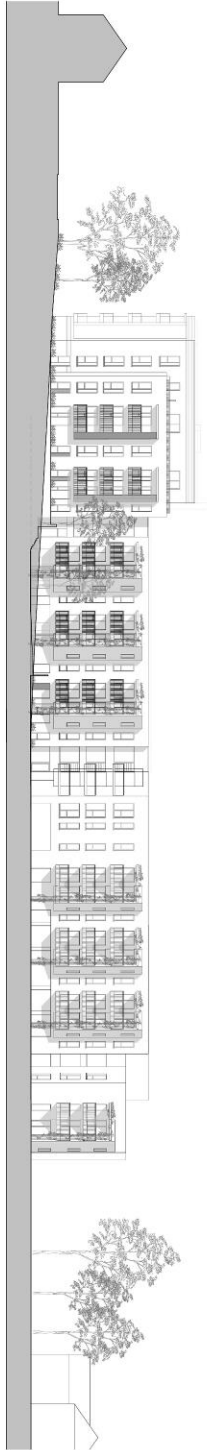
**Watkins House**  
 Woodlands Rd HA1 2RS

**Level 01 Plan**  
**As Proposed**  
 Scale 1:250 @ A1: 500 @ A3

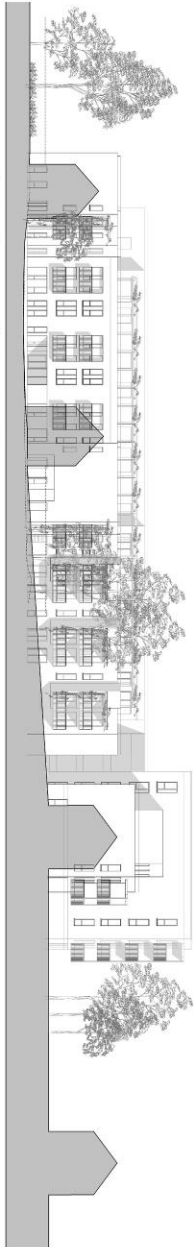
207 / PL102 / P1

Level 01 (ground floor of shared ownership) with curtilage

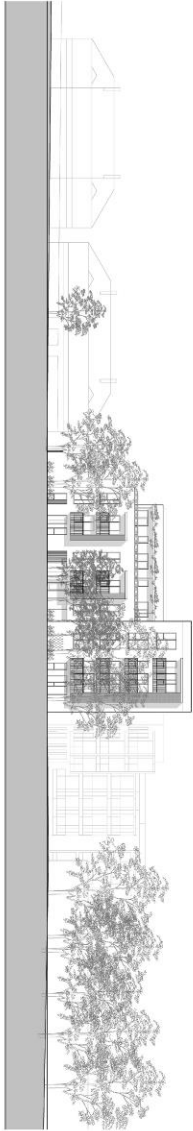
Street Elevation 1\_Crystal Way



Street Elevation 2\_Woodlands Road



Street Elevation 3\_Elmgrove Road



**Notes**

1. Do not scale from this drawing. All dimensions are indicated on this elevation view.
2. This drawing is for planning purposes only. Any dimensions and levels shown are indicative only and are not to be used for construction purposes.
3. Copyright: Tomlin Industries Architects Ltd. This drawing not to be reproduced without the permission of the author.
4. All areas and sizes are approximate only. Based on Ordnance Survey data only and subject to measured survey.



PLANNING JURY/CLIENTS REPRESENTATIVE: SHI WU/19/18 PL  
 Final Client Approval: SHI WU/19/18 SHI  
 Author: SHI WU/19/18  
 Date: 2018/11/20

**TM Architects**  
 Studio One, Southampton 172, Highbury Grove,  
 London W5 2EF | T: 0207 9567 1598

Watkins House  
 Woodlands Rd HA1 2RS

**Street Elevations  
 As Proposed**

Scale: 1:250 @ A1 1500 @ A3  
 Date: 2018/11/20

207 / PL113 / P1

**Streetscene**



Elevation 1



Elevation 2

Elevations 1-2

Notes

1. Do not scale from this drawing. All dimensions are indicated on the elevation itself.
2. This drawing is for planning purposes only. Any construction and build details are indicative only and subject to detailed structural and architectural design.
3. Copyright © Tomes Architects Ltd. This drawing not to be reproduced without the permission of the architect.
4. All areas and costs are approximate only. Based on Contractor's prices only and subject to market change.



Elevation Key

1. Façade Material/Stone
2. Façade Material/Brick
3. Façade Material/Brick
4. Façade Material/Brick
5. Façade Material/Brick
6. Façade Material/Brick
7. Façade Material/Brick
8. Façade Material/Brick
9. Façade Material/Brick
10. Façade Material/Brick
11. Façade Material/Brick
12. Façade Material/Brick
13. Façade Material/Brick
14. Façade Material/Brick
15. Façade Material/Brick
16. Façade Material/Brick
17. Façade Material/Brick
18. Façade Material/Brick
19. Façade Material/Brick
20. Façade Material/Brick



PLANNING APPLICATION NO: 18/0118/11  
 REF: 18/0118/11  
 DATE: 18/01/18

**TM Architects**  
 Studio: 120 Goswell Road, London EC2A 4DF  
 London EC2A 4DF | T: 020 3887 1938

Watkins House  
 Woodlands Rd HA1 2RS

Elevations 1 & 2  
 As Proposed  
 Scale: 1:100 @ A1 1:200 @ A2

DATE: 18/01/18

207 / PL108 / P1

Notes

1. Do not scale from this drawing. All dimensions are indicated on the elevation itself.
2. This drawing is for planning purposes only. Any construction and build details are indicative only and subject to detailed structural and architectural design.
3. Copyright © Tomes Architects Ltd. This drawing not to be reproduced without the permission of the architect.
4. All areas and costs are approximate only. Based on Contractor's prices only and subject to market change.



Elevation Key

1. Façade Material/Stone
2. Façade Material/Brick
3. Façade Material/Brick
4. Façade Material/Brick
5. Façade Material/Brick
6. Façade Material/Brick
7. Façade Material/Brick
8. Façade Material/Brick
9. Façade Material/Brick
10. Façade Material/Brick
11. Façade Material/Brick
12. Façade Material/Brick
13. Façade Material/Brick
14. Façade Material/Brick
15. Façade Material/Brick
16. Façade Material/Brick
17. Façade Material/Brick
18. Façade Material/Brick
19. Façade Material/Brick
20. Façade Material/Brick



PLANNING APPLICATION NO: 18/0118/11  
 REF: 18/0118/11  
 DATE: 18/01/18

**TM Architects**  
 Studio: 120 Goswell Road, London EC2A 4DF  
 London EC2A 4DF | T: 020 3887 1938

Watkins House  
 Woodlands Rd HA1 2RS

Elevations 3 & 4  
 As Proposed  
 Scale: 1:100 @ A1 1:200 @ A2

DATE: 18/01/18

207 / PL109 / P1



Elevation 3



Elevation 4

Elevations 3-4



Elevation 5



Elevation 7

**Notes**

- Do not scale from this drawing. All dimensions are approximate unless otherwise stated.
- This drawing is for planning purposes only. Any dimensions and levels shall be indicative only and subject to detailed structural and architectural design.
- Copyright TMAP Architects Ltd. This drawing not to be reproduced without the permission of the architect.
- All areas and sites are approximate only. Based on Ordnance Survey data only and subject to measured survey.



**Elevation Key**

1	Facing Brick (Weather Board)
2	Facing Brick (Weather Board)
3	Facing Brick (Weather Board)
4	Facing Brick (Weather Board)
5	Cladding (Stone)
6	Cladding (Stone)
7	Cladding (Stone)
8	Cladding (Stone)
9	Cladding (Stone)
10	Cladding (Stone)
11	Cladding (Stone)
12	Cladding (Stone)
13	Cladding (Stone)
14	Cladding (Stone)
15	Cladding (Stone)
16	Cladding (Stone)
17	Cladding (Stone)
18	Cladding (Stone)
19	Cladding (Stone)
20	Cladding (Stone)
21	Cladding (Stone)
22	Cladding (Stone)
23	Cladding (Stone)
24	Cladding (Stone)
25	Cladding (Stone)
26	Cladding (Stone)
27	Cladding (Stone)
28	Cladding (Stone)
29	Cladding (Stone)
30	Cladding (Stone)
31	Cladding (Stone)
32	Cladding (Stone)
33	Cladding (Stone)
34	Cladding (Stone)
35	Cladding (Stone)
36	Cladding (Stone)
37	Cladding (Stone)
38	Cladding (Stone)
39	Cladding (Stone)
40	Cladding (Stone)
41	Cladding (Stone)
42	Cladding (Stone)
43	Cladding (Stone)
44	Cladding (Stone)
45	Cladding (Stone)
46	Cladding (Stone)
47	Cladding (Stone)
48	Cladding (Stone)
49	Cladding (Stone)
50	Cladding (Stone)
51	Cladding (Stone)
52	Cladding (Stone)
53	Cladding (Stone)
54	Cladding (Stone)
55	Cladding (Stone)
56	Cladding (Stone)
57	Cladding (Stone)
58	Cladding (Stone)
59	Cladding (Stone)
60	Cladding (Stone)
61	Cladding (Stone)
62	Cladding (Stone)
63	Cladding (Stone)
64	Cladding (Stone)
65	Cladding (Stone)
66	Cladding (Stone)
67	Cladding (Stone)
68	Cladding (Stone)
69	Cladding (Stone)
70	Cladding (Stone)
71	Cladding (Stone)
72	Cladding (Stone)
73	Cladding (Stone)
74	Cladding (Stone)
75	Cladding (Stone)
76	Cladding (Stone)
77	Cladding (Stone)
78	Cladding (Stone)
79	Cladding (Stone)
80	Cladding (Stone)
81	Cladding (Stone)
82	Cladding (Stone)
83	Cladding (Stone)
84	Cladding (Stone)
85	Cladding (Stone)
86	Cladding (Stone)
87	Cladding (Stone)
88	Cladding (Stone)
89	Cladding (Stone)
90	Cladding (Stone)
91	Cladding (Stone)
92	Cladding (Stone)
93	Cladding (Stone)
94	Cladding (Stone)
95	Cladding (Stone)
96	Cladding (Stone)
97	Cladding (Stone)
98	Cladding (Stone)
99	Cladding (Stone)
100	Cladding (Stone)

PLANNING APPLICATION NUMBER: 18/0110/A/1  
 Date of Issue: 12/12/18  
 Scale: 1:100 @ A1, 1:250 @ A3

**TMAP Architects**  
 Studio 055 Sowerthorpe 122 Highby Grove,  
 London N12 2PJ | T: 020 3987 1936

Watkins House  
 Woodlands Rd HA1 2RS

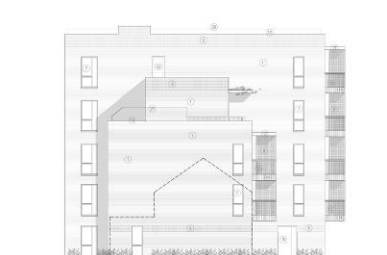
**Elevations 5 & 7  
 As Proposed**  
 Scale: 1:100 @ A1, 1:250 @ A3

207 / PL110 / P1

**Elevations 5 & 7**



Elevation 13



Elevation 6



Elevation 12

**Notes**

- Do not scale from this drawing. All dimensions are approximate unless otherwise stated.
- This drawing is for planning purposes only. Any dimensions and levels shall be indicative only and subject to detailed structural and architectural design.
- Copyright TMAP Architects Ltd. This drawing not to be reproduced without the permission of the architect.
- All areas and sites are approximate only. Based on Ordnance Survey data only and subject to measured survey.



**Elevation Key**

1	Facing Brick (Weather Board)
2	Facing Brick (Weather Board)
3	Facing Brick (Weather Board)
4	Facing Brick (Weather Board)
5	Cladding (Stone)
6	Cladding (Stone)
7	Cladding (Stone)
8	Cladding (Stone)
9	Cladding (Stone)
10	Cladding (Stone)
11	Cladding (Stone)
12	Cladding (Stone)
13	Cladding (Stone)
14	Cladding (Stone)
15	Cladding (Stone)
16	Cladding (Stone)
17	Cladding (Stone)
18	Cladding (Stone)
19	Cladding (Stone)
20	Cladding (Stone)
21	Cladding (Stone)
22	Cladding (Stone)
23	Cladding (Stone)
24	Cladding (Stone)
25	Cladding (Stone)
26	Cladding (Stone)
27	Cladding (Stone)
28	Cladding (Stone)
29	Cladding (Stone)
30	Cladding (Stone)
31	Cladding (Stone)
32	Cladding (Stone)
33	Cladding (Stone)
34	Cladding (Stone)
35	Cladding (Stone)
36	Cladding (Stone)
37	Cladding (Stone)
38	Cladding (Stone)
39	Cladding (Stone)
40	Cladding (Stone)
41	Cladding (Stone)
42	Cladding (Stone)
43	Cladding (Stone)
44	Cladding (Stone)
45	Cladding (Stone)
46	Cladding (Stone)
47	Cladding (Stone)
48	Cladding (Stone)
49	Cladding (Stone)
50	Cladding (Stone)
51	Cladding (Stone)
52	Cladding (Stone)
53	Cladding (Stone)
54	Cladding (Stone)
55	Cladding (Stone)
56	Cladding (Stone)
57	Cladding (Stone)
58	Cladding (Stone)
59	Cladding (Stone)
60	Cladding (Stone)
61	Cladding (Stone)
62	Cladding (Stone)
63	Cladding (Stone)
64	Cladding (Stone)
65	Cladding (Stone)
66	Cladding (Stone)
67	Cladding (Stone)
68	Cladding (Stone)
69	Cladding (Stone)
70	Cladding (Stone)
71	Cladding (Stone)
72	Cladding (Stone)
73	Cladding (Stone)
74	Cladding (Stone)
75	Cladding (Stone)
76	Cladding (Stone)
77	Cladding (Stone)
78	Cladding (Stone)
79	Cladding (Stone)
80	Cladding (Stone)
81	Cladding (Stone)
82	Cladding (Stone)
83	Cladding (Stone)
84	Cladding (Stone)
85	Cladding (Stone)
86	Cladding (Stone)
87	Cladding (Stone)
88	Cladding (Stone)
89	Cladding (Stone)
90	Cladding (Stone)
91	Cladding (Stone)
92	Cladding (Stone)
93	Cladding (Stone)
94	Cladding (Stone)
95	Cladding (Stone)
96	Cladding (Stone)
97	Cladding (Stone)
98	Cladding (Stone)
99	Cladding (Stone)
100	Cladding (Stone)

PLANNING APPLICATION NUMBER: 18/0110/A/1  
 Date of Issue: 12/12/18  
 Scale: 1:100 @ A1, 1:250 @ A3

**TMAP Architects**  
 Studio 055 Sowerthorpe 122 Highby Grove,  
 London N12 2PJ | T: 020 3987 1936

Watkins House  
 Woodlands Rd HA1 2RS

**Elevations 6, 12 & 13  
 As Proposed**  
 Scale: 1:100 @ A1, 1:250 @ A3

207 / PL112 / P1

**Elevations 6, 12 & 13**



Elevation 8



Elevation 9



Elevation 10



Elevation 11

**Notes**

1. Do not alter from the drawing, all dimensions are indicated unless otherwise stated.
2. The drawing is for planning purposes only. Any alterations and amendments are indicated only and subject to approval of the local planning authority.
3. Copyright TM Architects Architects Ltd. The drawing will be reproduced without the permission of the architect.
4. All areas and values are approximate only. Based on current survey data only and subject to ground levels.



**Elevation Key**

1. Polyethylene Glycol Insulation
2. Parge Coat 10mm to the Reinforcement
3. Parge Coat 10mm to the Reinforcement
4. Parge Coat 10mm to the Reinforcement
5. Parge Coat 10mm to the Reinforcement
6. Parge Coat 10mm to the Reinforcement
7. Parge Coat 10mm to the Reinforcement
8. Parge Coat 10mm to the Reinforcement
9. Parge Coat 10mm to the Reinforcement
10. Parge Coat 10mm to the Reinforcement
11. Parge Coat 10mm to the Reinforcement
12. Parge Coat 10mm to the Reinforcement
13. Parge Coat 10mm to the Reinforcement
14. Parge Coat 10mm to the Reinforcement
15. Parge Coat 10mm to the Reinforcement
16. Parge Coat 10mm to the Reinforcement
17. Parge Coat 10mm to the Reinforcement
18. Parge Coat 10mm to the Reinforcement
19. Parge Coat 10mm to the Reinforcement
20. Parge Coat 10mm to the Reinforcement
21. Parge Coat 10mm to the Reinforcement
22. Parge Coat 10mm to the Reinforcement
23. Parge Coat 10mm to the Reinforcement



TM Architects  
 Suite 105, 250 Woodlands Road, HA1 2RS  
 London W12 0JF, T: 020 8997 1000

Watkins House  
 Woodlands Rd HA1 2RS

**Elevations 8,9,10 & 11  
 As Proposed**

Scale: 1:100 (0.1% / 1:200 (0.5%))  
 Date: 12/11/18

207 / PL111 / P1

**Elevations 8, 9, 10 & 11**

**This page has been left intentionally blank**