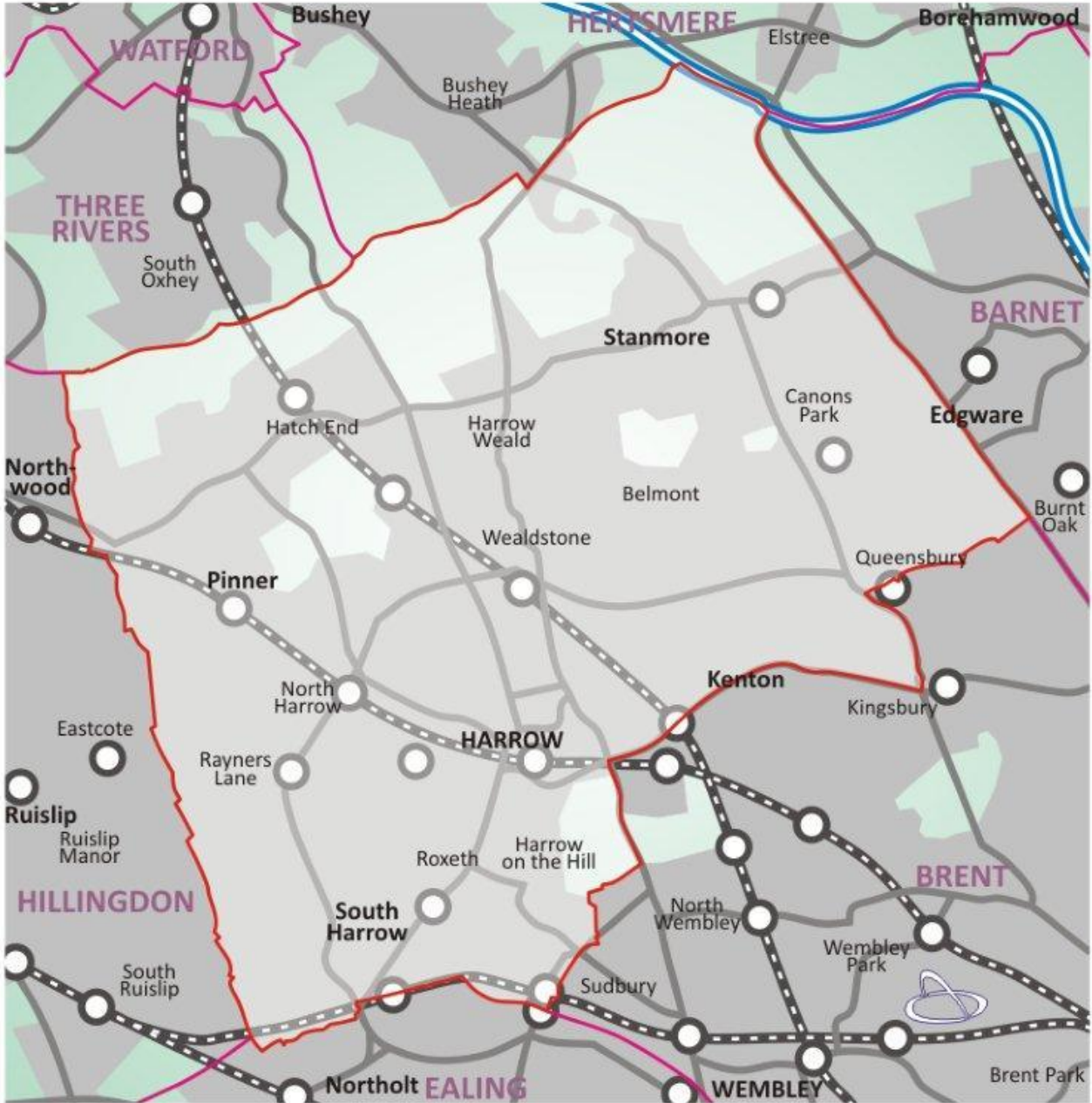
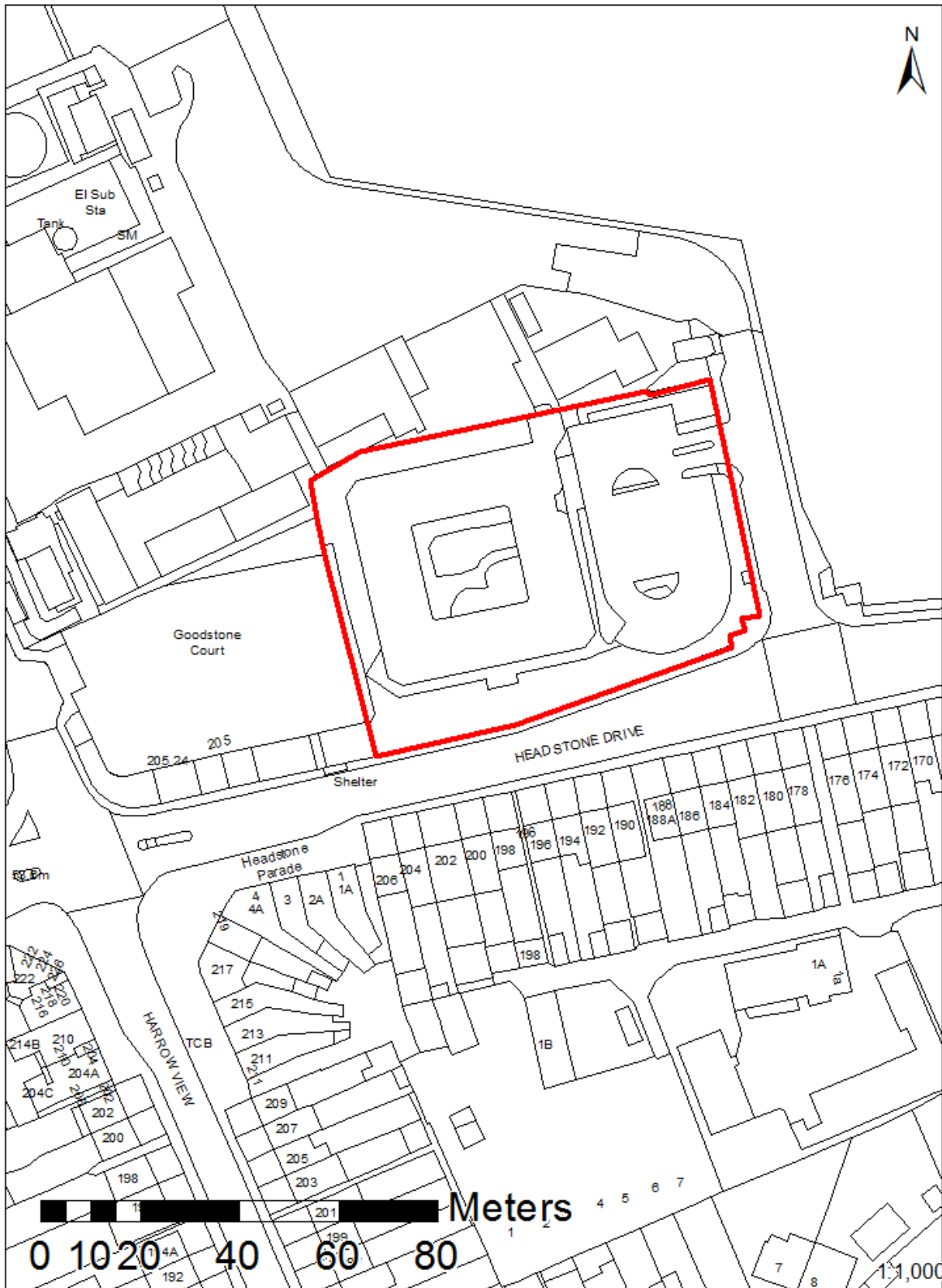


 = application site



Kodak, Headstone Drive	P/3434/18
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Kodak, Headstone Drive



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LONDON BOROUGH OF HARROW

PLANNING COMMITTEE

13th February 2019

APPLICATION NUMBER: P/3434/18
VALIDATION DATE: 19/09/2018
LOCATION: KODAK, HEADSTONE DRIVE, WEALDSTONE
WARD: MARLBOROUGH
POSTCODE: HA1 4TY
APPLICANT: MS EVA SISKINOVA
AGENT: MR IAN GRICE
CASE OFFICER: FAYE MCELWAIN
EXPIRY DATE: 01/06/2018

PROPOSAL

Extension and alterations to existing office building comprising of new third floor with amenity space at roof level; part infill of courtyard at all levels; refuse and cycle store; associated parking; substation; provision of air source heat pumps

RECOMMENDATION A

The Planning Committee is asked to:

GRANT planning permission for the reasons set out below:

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 Chief Planning Officer to issue the planning permission on completion of the Section 106 legal agreement and other enabling legislation and upon the receipt of an acceptable biodiversity report and strategy, and subject to the conditions, any minor amendment to these conditions listed in Appendix 1 of this report or the legal agreement, and any other additional conditions that may be required following the submission of an acceptable biodiversity report and strategy. The Section 106 Agreement Heads of Terms would cover the following matters:

Heads of Terms for the Legal Agreement

Sustainability/Energy

Connection to an existing or proposed heat network on reasonable commercial grounds if feasible (if connection is not possible future connection should be safeguarded)

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 8 of this permission.

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 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.

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 applicant fails to provide a satisfactory Biodiversity strategy and if the Section 106 Agreement is not completed by the 13th May 2019 or as such extended period as may be agreed by the 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 Chief Planning Officer on the grounds that:

1. The application has failed to demonstrate that the proposed development would provide suitable ecological enhancements on the site in accordance

with the strategic Harrow View East Masterplan as approved under P/2165/15 and therefore the proposals would be contrary to the National Planning Policy Framework (2018), Policy 7.19 of The London Plan (2016) and Policies DM 20 and DM 21 of the Harrow Development Management Polices Local Plan (2013).

2. 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 5.2, 5.3, 6.3, 6.9 and 6.13 of The London Plan (2016), Core Strategy (2012) policy CS1, Policy AAP 20 of the Harrow and Wealdstone Area Action Plan and policies DM1, DM13, DM14, DM42 and DM43 of the Harrow Development Management Polices Local Plan and the Supplementary Planning Document: Planning Obligations & Affordable Housing (2013).

REASON FOR THE RECOMMENDATION

Subject to a suitable biodiversity scheme and securing an acceptable section 106, the proposal would accord with relevant policy and the proposed development would have a satisfactory impact on the character of the area and the amenities of existing neighbouring occupiers, and would be acceptable in terms of the emerging development on the wider Harrow View East Masterplan.

For these reasons, weighing up the development plan policies and proposals, and other material considerations including comments received in response to notification and consultation, this application is recommended for grant.

INFORMATION

This application is reported to Planning Committee as the development would constitute a major development creating in excess of 1000sqm office floor space and therefore falls outside Schedule 1 of the Scheme of Delegation.

Statutory Return Type:	Major Development
Council Interest:	None
Net Additional Floor Area:	2442 sq m

GLA Community Infrastructure (CIL) Contribution (provisional):	£124,947.17 based on a £35 contribution per square metre of additional floorspace (including indexation)
Harrow Community Infrastructure (CIL) Contribution (provisional):	N/A- Not applicable to B1 Use

HUMAN RIGHTS ACT

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

EQUALITIES

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

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

S17 CRIME & DISORDER ACT

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

OFFICER REPORT

PART 1: Planning Application Fact Sheet

The Site	
Address	Kodak, Headstone Drive, Wealdstone
Applicant	Ms Eva Siskinova
Ward	Marlborough
Local Plan Allocation	The northernmost and eastern part of the former Kodak industrial site and a small section of land located on the southwest corner of the site are designated as a Strategic Industrial Location (SIL) in the Harrow and Wealdstone AAP and the Harrow Local Area Map.
Conservation Area	No
Listed Building	No
Setting of Listed Building	No
Building of Local Interest	No
Tree Preservation Order	No
Other	No

Non-Residential Uses		
Existing Use(s)	Existing Use / Operator	Vacant offices
	Existing Use Class(es) sq m	B1
Proposed Use(s)	Proposed Use / Operator	Proposed third floor and part infill of courtyard at all levels
	Proposed Use Class(es) sq m	6365 sq m
Employment	Existing number of jobs	0
	Proposed number of jobs	Unknown

Transportation		
Car parking	No. Existing Car Parking spaces	45
	No. Proposed Car Parking spaces	58
	Proposed Parking Ratio	N/A
Cycle Parking	No. Existing Cycle Parking spaces	0
	No. Proposed Cycle Parking spaces	40
	Cycle Parking Ratio	N/A
Public Transport	PTAL Rating	3
	Closest Rail Station / Distance (m)	Harrow and Wealdstone Underground Station 750m
	Bus Routes	H9, H10, H14
Parking Controls	Controlled Parking Zone?	Yes
	CPZ Hours	Mon to Sat 8am to 6:30pm
	Previous CPZ Consultation (if not in a CPZ)	N/A
	Other on-street controls	Single yellow lines on opposite side of Headstone Drive
Parking Stress	Area/streets of parking stress survey	N/A
	Dates/times of parking stress survey	N/A
	Summary of results of survey	N/A
Refuse/Recycling Collection	Summary of proposed refuse/recycling strategy	As existing

Sustainability / Energy	
BREEAM Rating	Not disclosed
Development complies with Part L 2013?	Not disclosed
Renewable Energy Source / %	Not disclosed

PART 2: Assessment

1.0 SITE DESCRIPTION

- 1.1 The application site is located centrally in the Borough and is situated on the former Kodak site area which, has a total area of 16.65 hectares and comprised of factory buildings and associated plant including a powerhouse and associated chimney and bound by highway land on Harrow View and Headstone Drive.
- 1.2 The larger site lies within the wider Harrow and Wealdstone Opportunity Area, as defined in the London Plan and in terms of area is the largest strategic site in this designation. In addition, the site falls within the Wealdstone West sub area Site 2 (Kodak and Zoom Leisure). The site allocates a minimum output of 1,230 jobs and 985 new homes to be achieved through a comprehensive mixed use led redevelopment of the site.
- 1.3 The current application specifically relates to a parcel of land of 0.47 hectares containing a vacant three storey square shaped office block with a central courtyard) to the south of the overall 'Harrow View East' Masterplan site. The existing building fronts Headstone Drive with a brickwork retaining wall fronting the road. The building was formally the administrative building for the former Kodak factory.
- 1.4 The building occupies part of 'Development Zone B' which was designated on the main masterplan for the site as 'Employment' land.
- 1.5 There is existing vehicular access from Headstone Drive to a parking area on the eastern side of the building.

2.0 PROPOSAL

- 2.1 The application proposes to extend the existing building for office use which comprises the infilling of the existing courtyard with additional office space and the creation of an additional storey to increase the height of the building from three stories to four stories.
- 2.2 The existing car park is to be reconfigured to provide 58 parking spaces with the bin store and cycle parking in the north west corner of the car park.
- 2.3 In addition a substation, which requires 24 accessed is proposed. In the south west corner of the site. The substation to be screened by additional planting to reduce the impact in the street scene.

3.0 RELEVANT PLANNING HISTORY

Reference Number	Development Description	Decision/ Date	Reason for Refusal (if applicable)
P/3405/11	<p>Outline planning application for a comprehensive, phased, mixed use development of land at Harrow View and Headstone Drive, as set out in the Development Specification (March 2012). The development comprises the demolition of existing buildings and structures (with the exception of the chimney and part of powerhouse) and redevelopment of the site for a mix of uses comprising business and employment uses (within Use Classes B1(a), B1(b), B1(c), B2 and B8 - up to 35,975sqm); residential dwellings (within Use Class C3 - up to 985 units); student accommodation (Sui Generis use - up to 220 units); senior living accommodation (within Use Class C2); assisted living care home (within Use Class C2) (total C2 uses up to 9,300sqm); retail and restaurant uses (within Use Classes A1, A2, A3, A4 and A5 - up to 5,000sqm); commercial leisure uses (Use Class D2); community uses (Use Class D1); health centre (Use Class D1); a primary school (Use Class D1) (total D1/D2 uses up to 8,830sqm); energy centre (Sui Generis use - up to 4,500sqm); together with new streets and other means of access and circulation; highway improvements; associated parking; re-profiling of site levels; utilities diversions and connections; open space; landscaping and ancillary development including infrastructure, works and facilities.</p>	<p>Granted 21/12/2012</p>	<p>N/A</p>

P/2182/15	Modification to section 106 planning agreement relating to planning permission P/3405/11 dated 21 December 2012 as varied by a deed of variation dated 22 December 2014 to define and split the obligations between the East Land (Harrow View East) and West Land (Harrow View West)	Granted 09/12/2015	N/A
P/4367/17	Non-material amendment to outline permission P/2165/15 dated 9/12/15 to correct inaccurate measurements annotated on the approved parameter plans and referred to in the approved Specification and Guideline Documents, and to increase the size of the proposed energy centre (Development Zone A only).	Approved 26/10/2017	N/A
P/5023/17	Non-material amendment to planning permission P/2165/15 dated 09/12/2015 to allow changes to access points, the green link, height locations and phasing boundaries.	Approved 20/12/2017	N/A
P/5079/17	Approval of all reserved matters for development plot D7 and the Green Link of Development Zone D of the Harrow View East Masterplan and details pursuant to conditions 7(Urban Design Report), 8(Energy Strategy), 9(Ecology and Biodiversity Strategy), 11(Housing Schedule), 12(Daylight and Sunlight Assessment), 13(Surface Water Drainage Strategy), 14(Accessibility Strategy), 15(Lighting Strategy), 16(Refuse Strategy), 17(Noise and Vibration Strategy), 18(Arboreal Strategy), 19(Landscaping), 20(Transport Strategy), 21(Levels), 22(Open Space Strategy) following outline planning permission granted under P/2165/15 dated 09.12.2015 for the comprehensive phased, mixed use development of land bounded by Harrow View and Headstone Drive (known as Harrow View East)	Granted 02/02/2018	N/A

P/3004/18	Non-material amendment to planning permission P/2165/15 dated 9/12/2015 to correct factual inaccuracies associated with the approved parameter plans and enable non-material changes to the approved parameter plans (zonal boundaries, limits of deviation and building heights)	Approved 03/08/2018	N/A
P/3892/18	Approval of all reserved matters for development Plots B1 and C1 and sections of the Green Link of Development Zones B and C of the Harrow View East Masterplan and details pursuant to Conditions 7 (Urban Design Report), 8 (Energy Strategy), 9 (Ecology and Biodiversity Strategy), 11 (Housing Schedule), 12 (Daylight and Sunlight Assessment), 13(Surface Water Drainage Strategy), 14 (Accessibility Strategy), 15 (Lighting Strategy), 16(Refuse Strategy), 17 (Noise and Vibration Strategy), 18 (Arboricultural Strategy), 19(Landscaping), 20 (Transport Strategy), 21 (Levels), 22 (Open Space Strategy) following outline planning permission granted under P/2165/15 dated 09.12.2015 for the comprehensive phased, mixed use development of land bounded by Harrow View and Headstone Drive (known as Harrow View East)	Granted 06/12/2018	N/A

4.0 CONSULTATION

4.1 A total of 228 neighbouring properties were consulted and a site notice was placed in the vicinity of the site with the notification period expiring on 21 November 2018.

4.2 Adjoining Properties

Number of Letters Sent	228
Number of Responses Received	0
Number in Support	0
Number of Objections	0
Number of other Representations (neither objecting or supporting)	0

4.3 No objections were received from adjoining residents.

4.4 Statutory and Non Statutory Consultation

The following consultations have been undertaken:

- Engineering Drainage Section
- LBH Highways
- Landscape Architect
- Design Officer
- Biodiversity Officer
- Travel Plan Coordinator
- Environmental Health

4.5 Internal and External Consultation

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

Consultee	Summary of Comments	Officer Comments
Drainage Officers	The applicant should submit drainage details in line with the standard requirements. The use of non-permeable surfacing for all hardstanding is required. The required information can be dealt with by standard conditions/informatives.	Comments noted.
Transport	The layout is acceptable and the number of electric vehicle charging bays is welcomed. The applicant should be mindful of the new London Plan standards. The proposed disabled persons parking bays are sufficient. However there is a requirement for provision of 5% enlarged standard spaces capable of future conversion. The swept path analysis drawings are acceptable.	Comments noted
Landscape Architect	The car park and street frontage could benefit from additional tree planting . Details of all hard and soft landscaping is required. Details of proposed cycle and bin storage is also required. Hard and soft landscaping conditions would be required.	Comments noted

Design Officer	Daylight to the atrium should be more carefully considered.	Comments noted
Biodiversity Officer	<p>The submitted biodiversity report is unacceptable. The report lacks a proper desktop survey and contains incorrect statements. In addition the suggestions which emerge from the report do not seem to have been taken account. The following should be secured before approving the application either by a revised scheme or by planning condiditon.</p> <ul style="list-style-type: none"> · Summer bat roosts, winter bat hibernation, shelters, bird boxes to be incorporated within the fabric of the building · Wildlife friendly plantings to offer a wide mix of food and shelter for birds and invertebrates over the course of the year at ground level · Details of how existing trees are to be protected and any losses to be compensated for · Details of how disturbance to nesting birds will be avoided · Details of Invasive Non-Natives removal and disposal · A biodiverse green/blue roof to be designed and installed by specialist contractors · Details of how contractors will be made aware of these, to ensure legal compliance and best outcomes · Plans for how these will be implemented - to be submitted for approval – to be prepared by suitably qualified and experienced consultants · Plans for the ongoing management/maintenance of the landscaped areas and wildlife features including the green roof, with information about how this will be funded via the building service charge - to be submitted for approval 	Comments noted and a split recommendation is proposed.

Travel Plan Coordinator	Following suggested amendments the travel plan is acceptable.	
Environmental Health	The noise report is adequate for its purpose. Provided the development progresses as specified in the noise report the development can be completed as proposed.	
Policy	<p>The energy strategy is insufficient. A revised strategy should be conditioned/submitted requiring a 35% reduction in carbon emissions relative to Part L, 2013 Building Regulations and addressing:</p> <ul style="list-style-type: none"> • Potential connection to the proposed heat network on the adjoining Harrow View East site, including measures to safeguard this connection (now and in the future) • Further details regarding the location of the proposed solar PV panels and Air Source Heat Pumps and scope for additional ones • Apparent issues with calculations within the document • Revised calculation of any emissions that need to be offset and justification for this (i.e. why they cannot be achieved on site). <p>The following Heads of Terms in a s106 agreement:</p> <ul style="list-style-type: none"> • Connection to an existing or proposed heat network on reasonable commercial grounds, if feasible. The heating system within the building should be designed to be compatible with any existing / proposed heat network, including adequate space within plant room/s within the building and safeguarding of a route from the building to the site boundary. • If connection not possible at this 	

	<p>point in time, future connection should be safeguarded.</p> <ul style="list-style-type: none"> • Payment of any required offset contribution. Payment should be calculated once the building has been completed and final Part L Building Regulations submitted to calculate the actual emissions that need to be offset, with the payment calculated at £1,800 tonnes per carbon 	
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5.0 **POLICIES**

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

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

5.2 The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these should be applied; it is a material consideration in the determination of this application. The current NPPF was published in July 2018 and replaces the first NPPF (March 2012).

5.3 In this instance, the Development Plan comprises the London Plan (2016) and the Local Plan. The Local Plan comprises the Harrow Core Strategy (2012), Harrow and Wealdstone Area Action Plan (AAP) 2013, the Development Management Policies Local Plan (2013), the Site Allocations Local Plan (2013) and the accompanying policies map.

5.4 While this application has been principally considered against the adopted London Plan (2016) policies, some regard has also been given to relevant policies in the Draft London Plan (2017), as this will eventually replace the current London Plan (2016) when adopted and forms part of the development plan for the Borough.

5.5 The document was published in draft form in December 2017. Given that the draft Plan is still at early stages of the formal process it holds very limited weight in the determination of planning applications. Although this weight will increase as the Draft London Plan progresses to examination in public stage and beyond, applications would continue to be determined in accordance with the 2016 London Plan. It is anticipated that the Examination in Public will commence early 2019.

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

6.0 ASSESSMENT

6.1 The main issues are:

- Background and Principle of the Development
- Character and Appearance of the Area
- Amenity of Neighbouring Occupiers
- Traffic and Parking
- Development and Flood Risk
- Biodiversity and Trees
- Sustainability/Energy
- Environmental Impact Assessment
- Air Quality

6.2 Background and Principle of Development

6.2.1 The principle of redevelopment of the former Kodak factory site has been long established through the approval of two outline permissions under refs: P/3405/11 and P/2165/15 for the comprehensive phased mixed re-development of the former factory site.

6.2.2 Further to the outline permission granted under P/2165/15, a non-material minor amendment application was submitted (s.96a application) under ref: P/4367/17 to correct inaccurate measurements annotated on the approved parameter plans and referred to in the approved Specification and Guideline Documents. This application followed a detailed survey of the site which established that the onsite measurements did not correlate with the approved parameter plans. This application was approved in October 2017. Following this s.96a application, a further s.96a application (Ref: P/5023/17) was submitted and subsequently approved in December 2017. The amendments in this later application are the same as that approved under application P/4367/17, save that a minor adjustment has been made between the development plot boundary shared between zones B and D to include the full extent of the green link and shared surface route within zone D. A further s.96a application was submitted under ref: P/3004/18 which sought to correct the factual inaccuracies associated with the approved parameters plans in relating to development plots B1 and C1, and to enable changes to the approved parameter plans specifically relating to the zonal boundaries, limits of deviations and building heights. This was approved in August 2018.

6.2.3 The Kodak factory site is identified as a development opportunity site in the AAP and falls within the Wealdstone West sub area Site 2. The site allocates a minimum output of 1,230 jobs and 985 new homes to be achieved through a comprehensive mixed use led redevelopment of the site.

6.2.4 The current application relates to an existing administrative office building of the former factory to the south of the site which was designated in the overall masterplan as employment land. The application proposes to increase the floorspace of the existing building whilst retaining the B1 use. This is in accordance with the approved masterplan and it is considered that the principle of the proposal does not prejudice the Local Planning Authority in seeking that the detailed development meets the aspirations set out in the Area Action Plan and approved in the outline permission.

6.3 Character and Appearance of the Area

6.3.1 The London Plan (2016) policies 7.4B and 7.6B set out the design principles that all boroughs should seek to ensure for all development proposals. The London Plan policy 7.4B states, *inter alia*, that all development proposals should have regard to the local context, contribute to a positive relationship between the urban landscape and natural features, be human in scale, make a positive contribution and should be informed by the historic environment. The London Plan policy 7.6B states, *inter alia*, that all development proposals should; be of the highest architectural quality, which complement the local architectural character and be of an appropriate proportion, composition, scale and orientation. Development should not be harmful to amenities, should incorporate best practice for climate change, provide high quality indoor and outdoor spaces, be adaptable to different activities and land uses and meet the principles of inclusive design. The ethos of these principles are carried over in the draft London Plan policies D1 and D2.

6.3.2 Core Policy CS1.B specifies that 'All development shall respond positively to the local and historic context in terms of design, siting, density and spacing, reinforce the positive attributes of local distinctiveness whilst promoting innovative design and/or enhancing areas of poor design; extensions should respect their host building.'

6.3.3 Policies AAP3 and AAP4 of the Harrow and Wealdstone Area Action Plan 2013 seeks to ensure that all development proposals achieve a high standard design and layout. Development within all three sub areas of Wealdstone as set out in the AAP will be required to *inter alia* strengthen the district centre and improve the environment and identity of the Wealdstone area as a location for business and industrial activity and for family living. Criterion E of policy AAP3 sets out the design parameters that should be taken into consideration when assessing development proposals within Wealdstone West sub area, which *inter alia* includes the plan's vision to improve the link between the west sub area of Wealdstone and the district centre, design which creates a sense of place that is related to and an extension of Wealdstone and make provision for community uses that are not appropriate to locate in the district centre.

- 6.3.4 The original building has a dominating presence on this section of Headstone Drive. It has two stories of brick work and with a mansard roof which forms an upper storey consisting of grey panels. The proposal broadly maintains the architectural style of the original façade of the existing office building whilst adding a fourth floor above the roof. The additional floor has slightly less depth, width and height, which is consistent with the form and proportions of the existing building. The additional floor therefore does not appear top heavy or overly disproportionate. The existing building consists of traditional Flemish bond brickwork with grey panels on the mansard roof. It is proposed that the third floor is to be replaced with traditional brickwork to match the texture, colour and bond of the original building with grey spandrel panels proposed on the external walls of the proposed additional floor with aluminium framed windows to match the existing windows. It is considered that this differentiation in materials is appropriate to maintain the form of the building consistent with its original appearance and presence in the streetscene.
- 6.3.5 An aluminium strip rooflight along with an air handling unit are proposed in the centre of the roof. As these are set in at least 11m from the edge of the roof they will not be highly visible from Headstone Drive and the surrounding area and do not raise significant concerns in relation to the design of the building.
- 6.3.6 The proposed infilling of the courtyard will not be visible from public vantage points and will therefore not have an impact on the design of the overall building.
- 6.3.7 The landscaping plan shows the retention of some existing trees on the site and replacement shrubs and trees. It is considered that further details are required to demonstrate that the site will achieve a sufficient balance between hard and soft landscaping. Also it is considered that more planting is required on the northern boundary to act as a buffer with the development approved on Plot B1 to the north of the site.
- 6.3.8 A substation with restricted access for emergency services is proposed by the South West corner of the building which is understood to be essential for servicing the development. Screening is proposed to shield the substation from public view. The details of which will be sought by the landscaping condition.
- 6.3.9 An external lighting plan has been submitted demonstrating the location of light columns, and wall lights throughout the development. The existing building would have originally had associated lighting and the proposed lighting does not appear excessive for a building of this scale. In order to ensure that the proposed lux levels of the proposed lighting does not have a negative impact on the character of the area in terms of light pollution it would be expected that the lighting details would be conditioned to ensure that it would not result in significant light spillage to adjacent sites.

6.3.10 Subject to appropriate conditions relating to materials, landscaping and lighting the proposal is considered to comply with London Plan (2016) Policies 7.4B and 7.6B, Core Policy CS1.B of the Harrow Core Strategy (2012), Policy DM1 of the Harrow Development Management Policies Local Plan (2013) and Policies AAP3 and AAP4 of the Harrow and Wealdstone Area Action Plan (2013).

6.4 Amenity of Neighbouring Occupiers

6.4.1 Policy DM1 of the DMP 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”.

6.4.2 To the west of the site is a four storey residential block of flats which is currently occupied. Due to levels changes, the existing office building is raised above these flats.

6.4.3 To the north of the site is plot B1 of the masterplan which has recently been granted permission for 60 residential apartments. This consists of Block B1 which is an eight storey building containing 34 residential units and Block B2 which is a five storey building consisting 26 residential units. The proposed buildings with are positioned approximately 7m from the shared boundary with the site. The amenity of the potential future occupiers of these units is a material consideration.

6.4.4 Although the building will be raised in height, the additional story is not considered to significantly increase the overall dominance of the building or to overbear the occupiers of the existing building significantly more than the existing situation or to have a significantly worse impact on the future occupiers of the building on Plot B1 to the north.

6.4.5 In order to establish whether the proposals will have a significant effect on the daylight enjoyed by the occupiers of neighbouring properties (existing and future), a Vertical Sky Component analysis (VSC) has been undertaken. BRE guidelines states that if the VSC at the centre of a window is less than 27% and it is less than 0.8 times its former value (i.e. proposed reduction is greater than 20%) then the reduction in skylight will be noticeable, and the existing building may be adversely affected.

6.4.6 With regard to daylight, the BRE Guidelines also set out numerical values for Daylight Distribution and seeks to ensure that a significant portion, which is considered to mean at least 0.8 times the existing area of each habitable room, lies in front of the No Sky Line (NSL).

- 6.4.7 The daylight and sunlight assessment submitted with the application concludes that there will be a negligible impact on the existing occupiers of the flats to the west. In regards to the proposed development on Plot 1 to the north, the daylight assessment showed that of the 89 windows on the elevation beside the boundary 16 windows would fail to meet the BRE criteria and the sunlight assessment showed 8 of the windows would fail to meet the criteria. However, all the windows that fail, would fail under the existing scenario and as many of the rooms are dual aspect, it is considered that the proposed extension would not have a significant impact to sunlight and daylight availability for the development. In addition the applicant has submitted a plan which demonstrates that the proposed development does not interrupt an upward plane angled at 45 degrees to the proposed windows in accordance with the guidance in the adopted SPD. It is considered that it has been demonstrated that the proposal would not give rise to an unacceptable level of harm to any residential amenities of neighbouring sites so as to warrant a refusal on such grounds.
- 6.4.8 The proposed parking spaces to the north of the site are close to the boundary with the development site to the north. This is considered to have a potential negative impact on the enjoyment of the proposed garden areas of the future occupiers. However, it would be possible to move the parking spaces further south to provide a buffer and with appropriate landscaping it is deemed that the impact on the future occupiers could be suitably mitigated. A condition is added to this effect.
- 6.4.9 Although, currently vacant, the office use is well established and therefore there is the potential for overlooking to residential properties from users of the office building. However, as this will likely be during daytime hours and not at weekends this is considered to be acceptable.
- 6.4.10 A plant has been proposed to the north of the building. A noise report has been submitted which concludes that this will not have an unacceptable impact on the amenity of neighbouring properties. The Council's Environmental Health department concur that the report demonstrates that there will not be a detrimental impact in terms of noise pollution from the proposed plant.
- 6.4.11 In view of the above, it is considered that the proposal as set out would result in an acceptable impact on the residential amenities of neighbouring properties in terms of loss of light, overshadowing and outlook, and would therefore comply with Policy 7.6B of The London Plan (2016), Policy DM1 of the Harrow Development Management Policies Local Plan (2013) and the adopted SPD: Residential Design Guide (2010).

Amenity of Users of the facility

6.4.12 The proposed creation of floor space in the courtyard area will create an internal office section within the centre of the building which would be served by two vertical atrium sections either side. Although, there are some concerns that this would not afford a significant amount of natural light to the office space, there are no planning policies which specifically protects the light availability of offices and this is not considered a sufficient reason to warrant refusal of the application.

6.5 Traffic, Parking and Construction

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 The London Plan Policies 6.3, 6.9 and 6.13 seek to regulate parking in order to minimise additional car travel, reduce trip lengths and encourage use of other, more sustainable means of travel. The Parking Addendum to Chapter 6 of The London Plan sets out maximum parking standards for new development dependent upon their use and level of public transport accessibility.

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

6.5.4 Policy DM42 states: "Proposals that would result in inappropriate on-site parking provision, having regard to the criteria in this policy, and those which would create significant on-street parking problems, prejudice highway safety or diminish the convenience of pedestrians and cyclists, will be resisted." Policy DM43 states that proposals that fail to satisfactorily mitigate the transport impact of development will be resisted.

6.5.5 Policy DM45 states sufficient provision should be made for refuse and recycling and that there must be appropriate access, which must be located and screened to avoid nuisance to occupiers and adverse visual impact.

6.5.6 The existing car park is proposed to be reconfigured to serve the development. The access from Headstone Drive would remain as existing. Fifty eight parking bays are proposed to include disabled and electric charging bays. Although the provision is over The London Plan minimum standards (1 space per 250sqm), it is considered that, as the building is in an area with medium public transport provision and that the proposal utilises the existing car park that this is acceptable. Sufficient detail has been provided

to demonstrate that cars can manoeuvre safely within the car park and there is not considered to be a substantially harmful impact on the transport network.

- 6.5.7 Two tier secure cycle parking for 40 cycles are proposed located close to the entrance to the building by the North East corner which is broadly in accordance with the maximum requirement of the London Plan of 1 space per 150 sqm.
- 6.5.8 A refuse store of simple design is also proposed beside the North East corner of the building. A Waste and Servicing Strategy has been submitted with the application which sets out the refuse collection and servicing strategy for the proposed development and also calculates likely waste generation for the office development, the recycling strategy and the storage requirements for bins. The council's transport officer is satisfied that the swept path analysis and supporting documents submitted by the applicant demonstrate that refuse lorries can safely enter the site for the purposes of refuse collection and that the servicing and waste collection can be undertaken in an efficient manner.
- 6.5.9 A travel plan was a requirement for a major development. The submitted Travel Plan has been reviewed by the Council's Travel Plan Coordinator and is considered acceptable to promote other modes of transport in accordance with the wide Green Travel Plan provisions and the promotion of sustainable means of transport as contained in the NPPF. The implementation and monitoring of the Travel Plan is proposed to be secured by Section 106 as detailed in the recommendation.
- 6.5.10 It is considered that the proposal as set out would be acceptable in terms of highways implications in accordance with Policies 6.3, 6.9 and 6.13 of The London Plan (2016), Policies DM42 and DM45 of the Harrow Development Management Policies Local Plan and Policy AAP 19 of the AAP.

6.6 Development and Flood Risk

- 6.6.1 The Flood Risk Assessment and Sustainable Drainage Systems Strategy submitted by the applicant are considered acceptable by the Council's Engineering Drainage Section. There are requirements in terms of Surface Water Attenuation, Storage, Surface Water Disposal and Foul Water Disposal and details of these have been attached as planning conditions for subsequent approval.
- 6.6.2 Subject to the conditions securing the above, it is considered that the proposed development would accord with policy 5.2 of London Plan (2016) and policy DM10 of the Harrow Development Management Policies Local Plan (2013).

6.7 Biodiversity and Trees

- 6.7.1 Policy 5.11 of the London Plan (2016) states that major development proposals should be designed to include roof, wall and site planting especially green roofs and walls where feasible.
- 6.7.2 Policy G6 of the emerging London Plan (2017) (Biodiversity and Access to Nature) states that Local Authorities should seek opportunities to create habitats that are of particular relevance and benefit in an urban context
- 6.7.3 Policy DM 20 states that the design and layout of new development should retain and enhance any significant existing features of biodiversity value within the site. Potential impacts on Biodiversity should be avoided . Green Corridors and green chains should be retained and proposals which would prejudice their functions as routes for the passage of wildlife through the urban environment will be resisted.
- 6.7.4 Policy DM 22 D states that The Council will require trees identified for retention during construction to be protected during construction and to be retained or replaced where necessary following the completion of the development.
- 6.7.5 The comprehensive redevelopment of the site has been an opportunity to greatly improve the biodiversity of the area and it is proposed to achieve this through the introduction of green open spaces, notably the Green Link and Headstone Manor Park and the introduction of landscaped green spaces to Harrow View. Although not designated as a SINC, the current application site is part of the wider site it would be expected to aspire to and not compromise the biodiversity objectives for the Masterplan of the wider site.
- 6.7.6 The Council's Biodiversity Officer has strong concerns with the quality of the Biodiversity report and does not consider that the application should be approved unless a revised report is submitted which utilises the correct methodology and contains fully accurate information. Furthermore a number of recommendations made in the report were not carried forwards into the scheme. In order to achieve compliance with the Council's policies and aspirations for the wider site and the policies contained within the current and emerging London Plan such measures as bat roosts, friendly plantings and a green roof are considered necessary. This would be consistent with the aspirations set out for the wider Harrow View East masterplan whilst this application is submitted as a standalone application any proposal on this site will need to have due regard to the approved masterplan in which this site is situated.

6.7.7 It is proposed to recommend that the committee grant permission subject to giving the Chief Planning Officer delegated powers to approve a revised Biodiversity report together with a strategy for securing its recommendations. Should acceptable details not be provided within the specified timeframe, it is proposed to refuse the application.

6.7.8 There are trees protected by tree protection orders located on the perimeter of the site. The submitted landscape plan suggest that the existing trees and shrubs on the frontage of the site will be retained and a comprehensive Arboricultural Impact Assessment outlines that suitable working and access space is available for the construction of the proposed development provided the specified tree protection measures are adhered to during construction. The landscaping condition will ensure that any additional planting is appropriate in relation to the existing trees and commensurate with the biodiversity strategy.

6.8 Sustainability/Energy

6.8.1 The London plan requires a non-residential development to achieve a 35% reduction in carbon emissions. This should be done by the following prioritising energy efficiency ('Be Lean') first, followed by efficient energy supply [i.e. connection to a communal heating system (if available)] ('Be Lean') and then finally, through on-site renewables ('Be Green'). Any required carbon emissions reductions that cannot be achieved on-site can be offset through a monetary contribution to undertake carbon reduction projects elsewhere in the borough; this should however be the exception rather than the norm, with the developer demonstrating that have maximised the on-site reductions first.

6.8.2 An Energy and Sustainability Statement has been submitted with the application which indicates that the required 35% reduction will be achieved through a 6.8% reduction from energy efficient/building fabric measures, 10.3% reduction from on-site renewables (solar PV panels) and a carbon offset contribution equating to 17.9%, bringing the total reductions to the required 35%.

6.8.3 The 6.8% reduction through energy efficiency measures('Be Lean') is below the 15% target for energy efficiency in the draft London Plan. However, it is recognised that the proposal is for additional floors on top of an existing building and partial infill of the courtyard on the existing levels, which limits some of the scope for energy efficiency measures (i.e. orientation, thermal mass, materials etc). Consequently although the proposed reductions through energy efficiency / building fabric are less than the draft London Plan target, they are considered acceptable given the site and the characteristics of the building.

- 6.8.4 In terms of the 'Be Clean' element of the energy hierarchy, the energy strategy has reviewed the London Heat Map which suggests there are no existing nor proposed heat networks in the vicinity of the development and dismissed connection to such a network as not being feasible. This is however incorrect, as the adjoining Harrow View East development will have a heat network that could serve the site. Consequently, a revised energy strategy would be required that fully addresses this opportunity. A condition is attached to secure an amended strategy. In addition the applicant would be required to enter into a section 106 agreement to ensure the connection to an existing or proposed heat network, or if such a connection is not possible at this time, future connection should be safeguarded.
- 6.8.5 As regards the final stage of the energy hierarchy ('Be Green' – renewable energy), the submitted energy strategy proposes solar PV panels and air source heat pumps (ASHP) as with this reducing carbon emissions by 10.3%. It is noted that the policy section of the report emphasises the 20% target for renewable energy in the current London Plan, although this is not actually set out in policy in the London Plan and the energy hierarchy set out above should be followed in the first instance (i.e. renewable energy is the final stage). The applicant proposes approximately 180 sqm of solar panels; it is unclear exactly where these and the air source heat pumps are proposed to be and whether there is scope for additional panels / ASHP.
- 6.8.6 The report suggests that on-site carbon reductions are between 16-17% and the balance is proposed to be achieved through a carbon off-set payment. Offset payments should only be made once all reasonable on-site measures have been proposed. In this regard, further on-site reductions are potentially possible, including connection to a district heat network and additional solar PVs. The revised strategy should explore this potential. However, should an offset payment still be required, this will be secured through a s106 agreement (Payment should be calculated once the building has been completed and final Part L Building Regulations submitted to calculate the actual emissions that need to be offset, with the payment calculated at £1,800 tonnes per carbon). This is set out in the heads of terms at the start of the report.

6.9 Environmental Impact Assessment

- 6.9.1 No formal screening opinion for this major application was requested. An informal screening was undertaken and it was determined that the proposed use would constitute an 'Urban Development Project' under Schedule 2 of the regulations. As the proposed development is below the threshold of 1 hectare it was considered that an Environmental Impact Assessment was not required for the development.

6.10 Air Quality

- 6.10.1 The Major of London's supplementary Guidance on The Control of Dust and Emissions During Construction and Demolition seeks to reduce emissions of dust and nitrogen oxides from construction around London.
- 6.10.2 The proposed development has the potential to expose future users to elevated pollution levels as well as cause adverse air quality impacts in the area during operation and construction phases. The applicant has submitted an Air Quality Assessment which determines baseline conditions at the site, considers its suitability for the proposed end-use and assessed the potential effects associated with the new scheme. Taking account of the Major of London's guidance, the report concluded that construction phase impacts would be negligible provided the guidance in the report are adhered to. It is therefore considered that the proposed development will comply with the guidance.

7.0 CONCLUSION AND REASONS FOR APPROVAL

- 7.1 The proposed development would enhance the current office facilities within the application site, which would be an appropriate use that would not unduly impact on the amenities of the residential occupiers (current and future) of the adjoining, or nearby properties, subject to the attached conditions. Subject to acceptable biodiversity details, the development would accord with the masterplan and would not prejudice the wider aims of the strategic development site. The proposed development would therefore accord Policy CS1 of the Harrow Core Strategy 2012, Policies 6.3, 6.9, 6.13, 7.4 and 7.6 of the London Plan (2016) and policies DM1, DM20. DM 42. DM45 of the Harrow Development Management Policies Local Plan (2013) and Policies AAP3, AAP4 and AAP19 of the Harrow and Wealdstone Area Action Plan (2013).

APPENDIX 1: Conditions and Informatives

Conditions

1 Timing

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

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

2 Approved Drawing and Documents

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

Drawings:

509-C-6103; 509-E-2260; Acoustic Enclosures Limited; L(00)001 Revision P2; L(01)020 Revision P2; L(01)021 Revision P2; L(01)022 Revision P2; L(01)023 Revision P2; L(02)001 Revision P2; L(02) 002 Revision P2; L(03)001 Revision P2; OS 1695-18.1 Rev A; L(00)101 Revision P3; L(00)102 Revision P3; L(01)120 Revision P3; L (01)121 Revision P3; L(01)122 Revision P3; L(01) 123 Revision P3; L(01)124 Revision P3; L(01)131 Revision P3; L(02) 101 Revision P3; L (02) 102 Revision P3; L(03) 100 Revision P3; VN81079-TR100 Revision B.

Documents:

Daylight and Sunlight Report dated 14th January 2019; Design and Access Statement; Transport Statement dated July 2018; Sustainable Drainage Systems Strategy dated July 2018; Full Travel Plan dated January 2019; Noise Impact Assessment dated September (Revision B); Air Quality Assessment; Phase 1 Flood Risk Assessment dated September 2018; Energy and Sustainability Statement dated August 2018; Waste and Servicing Strategy dated September 2018; Drainage and SUDS report dated September 2018; Arborocultural Impact Assessment dated September 2018; Specification for Soft Landscape works and Five Year Management Plan; Planning Statement dated August 2018.

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

3 Materials to Be Approved

The construction of the building hereby permitted shall not commence until samples of the materials to be used in the construction of the external surfaces of:

- the extension
- the ground surfacing
- the external surfaces of the refuse and cycle stores

have been submitted to, and approved in writing by, the local planning authority. The development shall be carried out in accordance with the approved details and shall thereafter be retained.

REASON: To safeguard the appearance of the locality, in accordance with policy DM1 of the Councils Development Management Policies Local Plan 2013.

4 Landscaping to Be Approved

The development hereby permitted shall not be occupied until there has been submitted to, and approved in writing by the local planning authority, a scheme of hard and soft landscape works for the forecourt and rear of the site. Soft landscape works shall include: planting plans, and schedules of plants, noting species, plant sizes and proposed numbers / densities.

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

5. 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 and green roofs, for plant growth and a programme of maintenance / plant replacement for the life time of the development, 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.

6 Landscape Implementation

All planting, seeding or turfing shall be carried out in the first planting and seeding seasons following the occupation of the approved building 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 or diseased, 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 safeguard the appearance and character of the area, and to enhance the appearance of the development, in accordance with policy DM23 of the Councils Development Management Policies Local Plan 2013.

7 Parking Spaces

The development relating to the car park and landscaping works hereby permitted shall not commence until a revised plan showing the parking spaces to the north of the site (labelled 47-53 on drawing numbered VN91079-TR100 Revision B) re-located further south to enable a landscape buffer between the proposed car parking spaces and the northern boundary with Plot B1, has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with these approved details and shall thereafter be retained.

REASON: To safeguard the amenities of the future occupiers of the neighbouring development site with extant permission to the north of the site in accordance with policy DM1 of the Harrow Development Management Local Policies Plan 2013.

8 Energy/Sustainability Statement

Notwithstanding the submitted Energy and Sustainability Statement, prior to the commencement of development a revised statement shall be submitted to and approved in writing by the Local Planning Authority. 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

REASON: To ensure the delivery of a sustainable development in accordance with the National Planning Policy Framework 2018, 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.

9 Construction Logistics Plan

No development shall take place, including any works of demolition, until a 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.

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

REASON: To ensure that measures are put in place to manage and reduce noise and vibration impacts during demolition and construction and to safeguard the amenity of neighbouring occupiers, in accordance with Policies 7.14 and 7.15 of the London Plan (2016) and Policy DM1 of the Development Management Policies Local Plan (2013) and to ensure that the transport network impact of demolition and construction work associated with the development is managed in accordance with Policy 6.3 of the London Plan (2016). 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.

INFORMATIVES

1 The following policies are relevant to this decision:

National Planning Policy Framework (2018) (NPPF)

The London Plan (2016):

2.18 Green Infrastructure: the multi functional network of green and open spaces.

4.3 Mixed used development and offices

4.2 Offices

5.2 Minimising Carbon Dioxide Emissions

5.3 Sustainable Design and Construction

5.11 Green roofs and development site environs

5.12 Flood Risk Management

5.13 Sustainable Drainage

6.3 Assessing Effects of Development on Transport Capacity

6.9 Cycling

6.13 Parking

7.1 Building London's Neighbourhoods and Communities

7.2 An Inclusive Environment

7.3 Designing Out Crime

7.4 Local Character

7.6 Architecture

The Draft London Plan (2017)

D1 London's form and characteristics

D2 Delivering Good Design

T6 Car Parking

G6 Biodiversity and Access to Nature

Harrow Core Strategy (2012)

Core Policy CS 1 Overarching Policy Objectives

Harrow Development Management Policies Local Plan (2013)

Policy DM 1 Achieving a High Standard of Development

Policy DM 2 Achieving Lifetime Neighbourhoods

Policy DM 10 On Site Water Management and Surface Water Attenuation

Policy DM 12 Sustainable Design and Layout

Policy DM 20 Protection of Biodiversity and Access to Nature.

Policy DM 22 Trees and Landscaping

Policy DM 32 Office Conversions

Policy DM 42 Parking Standards

Policy DM 44 Servicing

Policy DM 45 Waste Management

Harrow Area Action Plan (2013)

AAP3 – Wealdstone

AAP4 - Achieving a High Standard of Design throughout the Heart of Harrow

AAP19 – Transport, Parking and Access within the heart of Harrow.

Relevant Supplementary Documents

Supplementary Planning Document – Residential Design Guide (2010)).

The Control of Dust and Emissions During Construction and Demolition – Supplementary Planning Guidance.

2 **NPPF Statement**

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

This decision has been taken in accordance with paragraphs 187-189 of The National Planning Policy Framework. Harrow Council has a pre-application advice service and actively encourages applicants to use this service.

3 **Mayoral CIL**

Please be advised that approval of this application by Harrow Council will attract a liability payment 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 £20,580 for the application, based on the levy rate for Harrow of £35/sqm and the stated increase in floorspace of 2442 sqm

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

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

4 **Considerate Contractor Code of Practice**

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

5 Compliance with Planning Conditions

IMPORTANT: Compliance With Planning Conditions Requiring Submission and Approval of Details Before Development Commences - You will be in breach of planning permission if you start development without complying with a condition requiring you to do something before you start. For example, that a scheme or details of the development must first be approved by the Local Planning Authority. Carrying out works in breach of such a condition will not satisfy the requirement to commence the development within the time permitted.- Beginning development in breach of a planning condition will invalidate your planning permission.

- If you require confirmation as to whether the works you have carried out are acceptable, then you should apply to the Local Planning Authority for a certificate of lawfulness.

6 Liability For Damage to Highway

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

7 Sustainable Drainage Systems

The applicant is advised that surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SUDS). SUDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible.

SUDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SUDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity.

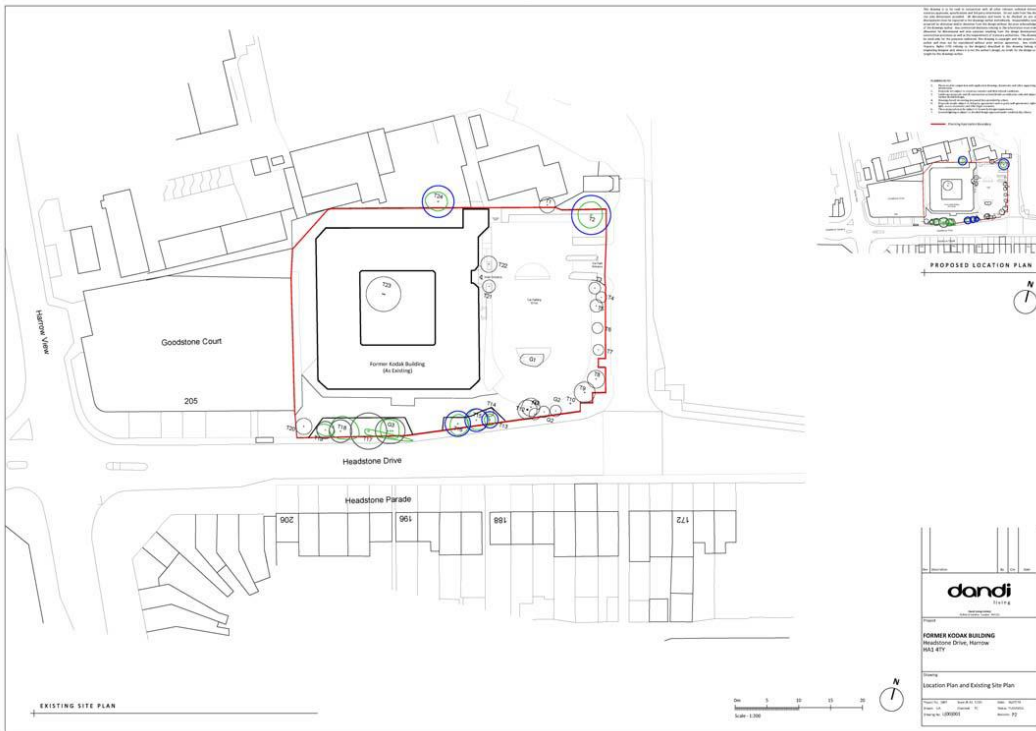
Where the intention is to use soak ways they should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365.

Support for the SUDS approach to managing surface water run-off is set out in the National Planning Policy Framework (NPPF) and its accompanying technical guidance, as well as the London Plan. Specifically, the NPPF (2012) gives priority to the use of sustainable drainage systems in the management of residual flood risk and the technical guidance confirms that the use of such systems is a policy aim in all flood zones. Policy 5.13 of the

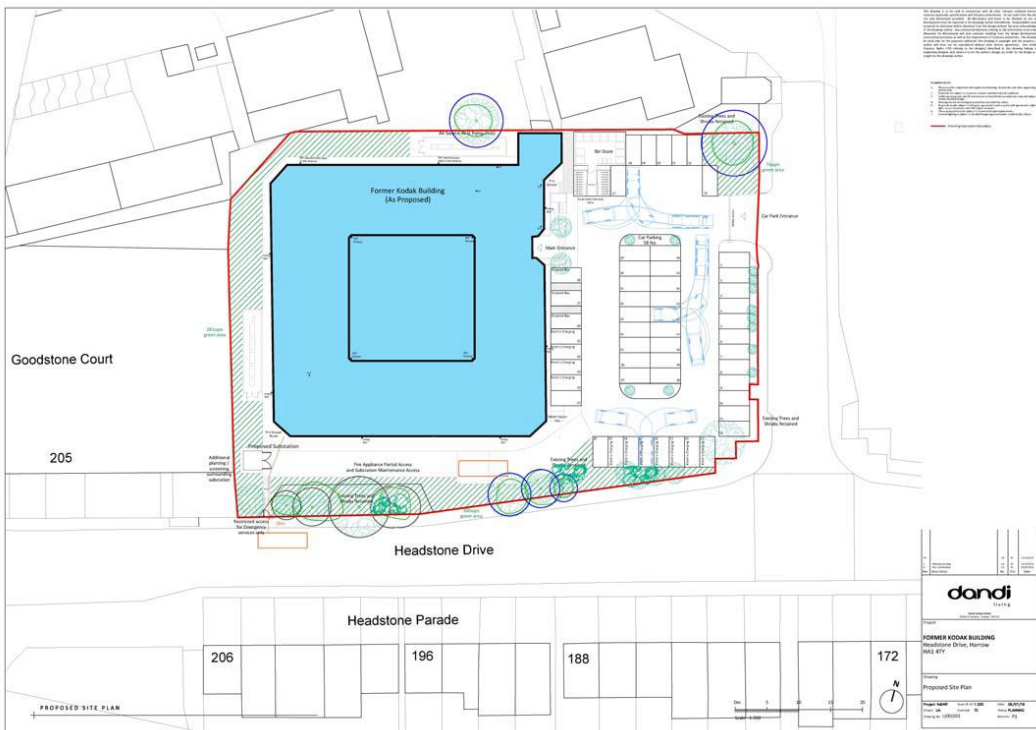
London Plan (2016) requires development to utilise sustainable drainage systems unless there are practical reasons for not doing so. Sustainable drainage systems cover the whole range of sustainable approaches to surface drainage management. They are designed to control surface water run-off close to where it falls and mimic natural drainage as closely as possible. Therefore, almost any development should be able to include a sustainable drainage scheme based on these principles.

The applicant can contact Harrow Drainage Section for further information.

APPENDIX 2: SITE PLAN



Existing Site Plan



Proposed Site Plan

APPENDIX 3: SITE PHOTOGRAPHS



Headstone Drive elevation



Elevation from the existing access Road



Existing Green frontage



Car park and view to plot B1



Residential flats to the west of the site.

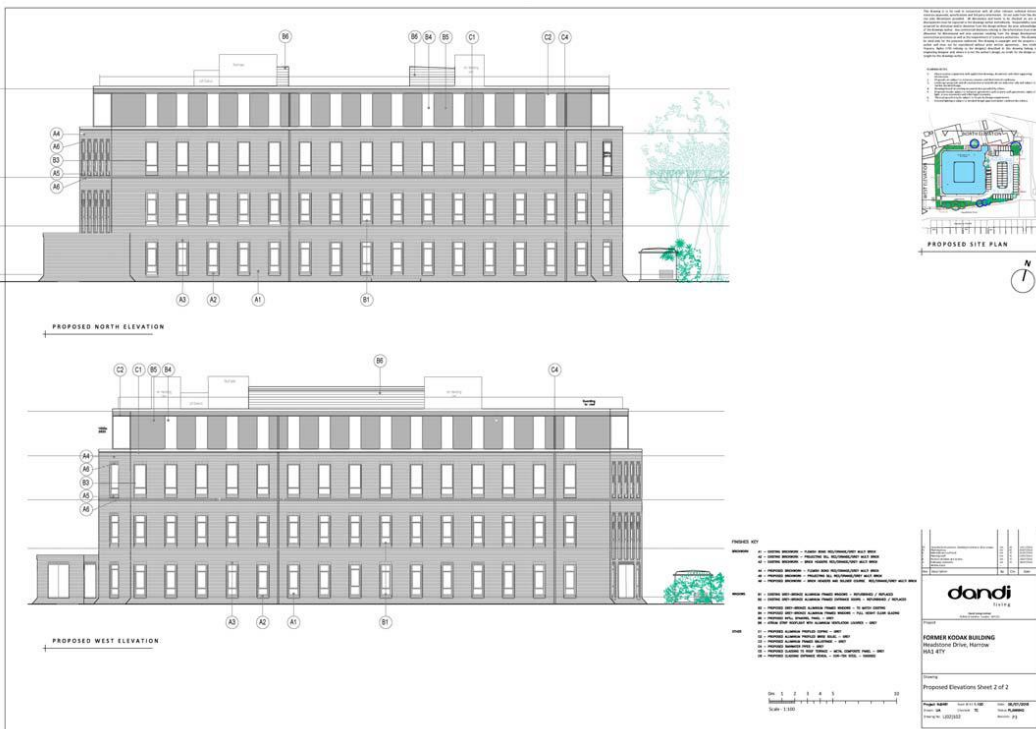


Front boundary wall to Headstone Drive

APPENDIX 4: PLANS



Proposed south and east elevations



Proposed north and west elevations

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