

LONDON BOROUGH OF HARROW

PLANNING COMMITTEE

20th March 2019

APPLICATION NUMBER: P/3671/18
VALIDATE DATE: 01/10/2018
LOCATION: PLOT A3, DEVELOPMENT ZONE A
HARROW VIEW EAST MASTER PLAN SITE
(FORMER KODAK FACTORY SITE)
HEADSTONE DRIVE
HARROW
WARD: MARLBOROUGH
POSTCODE: HA1 4TY
APPLICANT: QUADRANT CONSTRUCTION SERVICES
AGENT: CARTER JONES LLP
CASE OFFICER: SUSHILA BHANDARI
EXPIRY DATE: 31/12/2018

PROPOSAL

Construction of six to fourteen storey building to create Health care facility (Class D1) and 127 flats; Parking; Refuse and Cycle Storage; Associated landscaping

The Planning Committee is asked to:

RECOMMENDATION A

- 1) agree the reasons for approval as set out in this report, and
- 2) refer this application to the Mayor of London (the GLA) as a Stage 2 referral; and
- 3) subject to the Mayor of London (or delegated authorised officer) advising that he is content to allow the Council to determine the case itself and does not wish to direct refusal, or to issue a direction under Article 7 that he does not wish to direct refusal, or to issue a direction under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application, delegate authority to the 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 development and issue of the planning permission, subject to the resolution of all matters relating to the viability report and subject to minor amendments to the conditions or the legal agreement. The Section 106 Agreement Heads of Terms would cover the following matters:

Affordable Housing

Provision of 49 affordable homes, 32 affordable rent and 17 intermediate (to be provided on the wider Zone A site (owned by the applicant) within Plots A1.C, A.4 and A.5.

10% of affordable rent to be constructed as wheelchair standard home

Early stage review

Late stage review

Health Centre

Provision of health centre of total GIA of 1,386sqm

Not to commence development of Plot A5 until an agreement is in place to confirm that the health centre will be delivered in Plot A3.

Parking

Inclusion of parking permit restriction

Provision of 2 car club spaces

Travel Plan for Residential

Travel Plan for health centre

Travel Plan monitoring fee for each travel plan (£5,000 for each travel plan)

Design

To retain the planning submission architect/ design team for approval of all final design element in order to secure high design quality of the development.

Sustainability

Upon completion of the development, submission of 'As Built' Part L worksheets demonstrating the carbon emissions reductions achieved for each stage of the energy hierarchy and the remaining carbon emissions;

Calculation of the remaining carbon emissions that need to be offset to achieve zero carbon development for the residential element of the scheme and a 35% reduction (relative to Part L 2013) for the non-residential element; and

Calculation of the carbon offset contribution using the formula: Carbon emissions to be offset (tonnes) x £1800 / tonne.

Fees and Monitoring

Payment of section 106 monitoring fee upon completion of section 106 agreement (amount TBC)

Payment of all reasonable legal fees upon completion of section 106 agreement

RECOMMENDATION B

That if the Section 106 Agreement is not completed by 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:

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, 7.4, 7.5 and 7.6 of The London Plan (2016), Core Strategy (2012) policy CS1, policies AAP3, AAP13 and AAP19 of the Harrow and Wealdstone Area Action Plan(2013) and policies DM1, DM2 DM42, DM43 and DM50 of the Harrow Development Management Polices Local Plan and the Supplementary Planning Document: Planning Obligations (2013).

REASON FOR THE RECOMMENDATIONS

The principle of development on the former factory site has been established under outline planning application permission P/2165/15 which was approved by the Planning Committee in 2015. The outline permission was granted with all matters reserved for a comprehensive mixed use redevelopment of the Kodak Factory Site. The applicant owns Development Zone A of the masterplan site and has already secured reserved matters permission under P/4610/17 to bring forward a mixed use development scheme, comprising non-residential floor space, food store, 650 residential units and the southern section of the green link and square.

This application solely relates to Plot A3 located within Zone A, which is located on the southwest section of Zone A and fronts Headstone Drive to the south and Rokeby Road to the west.

The redevelopment of the site would enhance the urban environment in terms of material presence, attractive streetscape, and good routes, access and makes a positive contribution to the local area, in terms of quality and character. The massing and scale proposed would appropriately relate to the wider masterplan site and would permit full optimisation of this previously developed land to bring forward much needed housing which would positively add to the Council's housing delivery targets.

The proposal would secure the provision of affordable housing (which is to be provided on the wider masterplan site owned by the applicant) at a level that meets the minimum affordable housing target set out in the development plan.

The layout and orientation of the buildings and separation distance to neighbouring properties is considered to be satisfactory to protect the amenities of the neighbouring occupiers and the development would contribute towards the strategic objectives of reducing the carbon emissions of the borough.

The decision to grant planning permission has been taken having regard to the National Planning Policy Framework (2018), the policies of The London Plan (2016), Harrow's Core Strategy (2012), the policies of the Harrow and Wealdstone Area Action Plan (2013) and the policies of the Harrow Development Management Policies Local Plan (2013), as well as to all relevant material considerations including the responses to consultation.

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:	Pavement and carriageway along Headstone Drive is adopted highway
GLA Community Infrastructure Levy (CIL) Contribution (provisional):	To be confirmed
Local CIL requirement:	To be confirmed

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	Plot A3, Zone A, Harrow View East (Former Kodak Factory Site), Headstone Drive, Harrow, Greater London, HA1 4TY
Applicant	Quantrant Construction Services
Ward	Marlborough
Local Plan allocation	N/A
Conservation Area	N/A
Listed Building	N/A
Setting of Listed Building	N/A
Building of Local Interest	N/A
Tree Preservation Order	N/A
Other	

Housing		
Density	Proposed Density hr/ha	729 hr/ha
	Proposed Density u/ph	264 units/ha
	PTAL	3
	London Plan Density Range	70-170 dwellings/ha
Dwelling Mix	Studio (no. / %)	2 (2%)
	1 bed (no. / %)	42 (33%)
	2 bed (no. / %)	66 (52%)
	3 bed (no. / %)	17 (13%)
	4 bed (no. / %)	0 (0%)
	Overall % of Affordable Housing	39% (provided on other plots in Zone A).
	Social Rent (no. / %)	32 (25%)
	Intermediate (no. / %)	17 (14%)
	Private (no. / %)	78 (61%)
	Commuted Sum	N/A
	Comply with London Housing SPG?	Yes
	Comply with London Housing SPG?	Yes
Comply with M4(2) of Building Regulations?	Yes	

Non-residential Uses		
Existing Use(s)	Existing Use / Operator	N/A
	Existing Use Class(es) sqm	N/A
Proposed Use(s)	Proposed Use / Operator	Use Class D1
	Proposed Use Class(es) sqm	1,386
Employment	Existing number of jobs	N/A
	Proposed number of jobs	Unknown

Transportation		
Car parking	No. Existing Car Parking spaces	N/A
	No. Proposed Car Parking spaces	23
	Proposed Parking Ratio	1 space: 0.2 units
Cycle Parking	No. Existing Cycle Parking spaces	N/A
	No. Proposed Cycle Parking spaces	227
	Cycle Parking Ratio	1.8 spaces: 1 unit
Public Transport	PTAL Rating	3
	Closest Rail Station / Distance (m)	Harrow and Wealdstone Station / 750m as the crow flies
	Bus Routes	H9, H10, and H14.
Parking Controls	Controlled Parking Zone?	The streets on the southern side of Headstone Drive have an existing Controlled Parking Zone.
	CPZ Hours	N/A
	Previous CPZ Consultation (if not in a CPZ)	N/A
	Other on-street controls	Double yellow lines on some surrounding streets.
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	Summary of proposed	Each Core will have its

Collection	refuse/recycling strategy	own bin store adjacent to the entrance lobby with separate bins for the collection of general waste and recycling. The 5 properties that face onto Rokeby Road will have a shared bins store and the healthcare facility will also have its own bin store that can be accessed internally.
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Sustainability / Energy	
BREEAM Rating	N/A
Development complies with Part L 2013?	Yes – 35% reduction
Renewable Energy Source / %	Photovoltaics - Further 3.9% reduction

PART 2: Assessment

1.0 SITE DESCRIPTION

- 1.1 The subject site is known as Plot A3 and is sited within the Harrow View East masterplan site and located within Development Zone A of the masterplan site, which itself is located within the southern section of the wider masterplan site.
- 1.2 The wider masterplan site was previously occupied by Kodak Factory which included a range of industrial, logistical and administrative office buildings including the main powerhouse chimney, which is the tallest structure on the site. The wider site is in the process of demolition works, with the exception of the main chimney which is to be retained and the administrative office. These demolition works are associated to the parcel of land outside of the ownership of the applicant (Development Zones B-D).
- 1.3 Plot A3 is located on the southwest section of Zone A and is bounded by Headstone Drive to the south, Rokeby Road to the west and the proposed green link (Zone A) to the east. It is a triangular parcel of land with a site area of approximately 0.48 hectares. The site currently features open scrub land that is enclosed by security fencing fronting Headstone Drive and Rokeby Road.
- 1.4 The 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.
- 1.5 The outline permission granted under P/2165/15 for the wider masterplan site secures the provision of up to 1,800 residential units a mix of uses comprising business and employment uses up to 32,360 sqm, senior living accommodation and assisted living care home up to 10,230 sqm, foodstore, flexible active uses (within Use classes A1-A5, B1a and D1) (up to 2,000 sqm), leisure and community uses, health centre, a primary school, energy centre together with new streets and other means of access and circulation; highway improvements; associated parking (including a multi-storey car park (Sui Generis use)(up to 8,900sqm)); re-profiling of site levels; utilities diversions and connections; open space; landscaping and ancillary development including infrastructure, works and facilities.
- 1.6 Under the reserved matters application approved under P/4610/17, Plot A3 comprised the care home (approval of scale only) on the southern section and a residential 6 storey block consisting of 30 units on the northern section of the plot.

2.0 PROPOSAL

- 2.1 The proposal seeks to construct a perimeter block which would comprise a healthcare facility with a total GIA of 1,386sqm and 127 residential apartments. There would be three blocks (cores) that would form pentagonal structures that would encircle a podium level.
- 2.2 Core A would be the highest tower at 14 storeys (approx. 46.5m from ground level) and would be situated within the northern section of Plot A3. Core B would be situated within the south-eastern section of Plot A3 and would have a height of 6 storeys. Core C would be located situated within the south-western section of Plot A3 and would be 8 storeys in height.
- 2.3 The healthcare facility would be located at ground and first floor levels along Headstone Drive frontage, with the ground floor section turning on to the Green Link to provide activation on this frontage. The ground floor of the healthcare facility is most likely to comprise the consulting rooms, patient waiting area and the reception, with the administrative and other associated functions and staff office located at first floor level. The internal space would be designed and fitted out by an industry specialist for such healthcare facilities.
- 2.4 The frontage along the Green Link would comprise three maisonettes (at 3 storeys in height), frontage of two apartments and entrances to the Cores.
- 2.5 The site would comprise market housing only, with the affordable housing being provided on the wider masterplan site within Plots A1(C), A4 and A5.
- 2.6 19 car parking spaces, including 4 disabled spaces would be provided within the podium space for residential use. A further 8 surface parking spaces are proposed for the healthcare facility.

3.0 RELEVANT PLANNING HISTORY

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

Ref no. Description	Status and date of decision
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<p>P/3405/11</p> <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>P/2182/15</p> <p>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)</p>	<p>Approved 9/12/2015</p>
<p>P/2165/15</p> <p>Outline planning application (all matters reserved) for a comprehensive, phased, mixed use development of land at Harrow View and Headstone Drive (known as Harrow View East), as set out in the Development Specification (September 2015). The development comprises the demolition of existing buildings and structures</p>	<p>Granted 09/12/2015</p>

<p>(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 32,360 sqm); residential dwellings (within Use Class C3) (up to 1800 units); senior living accommodation and assisted living care home (both within Use Class C2) (up to 10,230 sqm); foodstore (within Use Class A1) (up to 2,000sqm); Flexible active uses (within Use classes A1-A5, B1a and D1) (up to 2,000 sqm); leisure and community uses including 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 9,730sqm); energy centre (Sui Generis use)(up to 600sqm) (including an interim energy centre in Phase C (up to 200sqm); together with new streets and other means of access and circulation; highway improvements; associated parking (including a multi-storey car park (Sui Generis use)(up to 8,900sqm)); re-profiling of site levels; utilities diversions and connections; open space; landscaping and ancillary development including infrastructure, works and facilities.</p>	
<p>P/5432/16 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).</p>	<p>Approved 15/12/2016</p>
<p>P/4610/17 Approval of all reserved matters for development plots A1, A2, A3 (part A3(a) only), A4, A5, Green Link and Central Green, and approval of scale only for development plot A3(b) of Development Zone A 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</p>	<p>Approved 18/12/2017</p>

<p>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).</p>	
<p>P/1805/18 Non-material amendment attached to planning permission P/2165/15 dated 9/12/15 to amend wording of Condition 29 to remove reference to combined heat and power network</p>	<p>Approved 23/05/2018</p>
<p>P/1806/18 Non-material amendment to planning permission P/4610/17 dated 18.12.17 to amend wording of Condition 9 to remove reference to combined heat and power plant</p>	<p>Approved 23/05/2018</p>
<p>P/3796/18 Non-Material amendment to Reserved Matters permission P/4610/17 dated 18/12/2017 to amend layout and elevations of food store, ancillary spaces and flats within Block A1-A</p>	<p>Under consideration</p>
<p>P/4188/18 Non material amendment to reserved matters permission P/4610/17 dated 18/12/2017 to allow removal of health care centre and addition of D1 unit (nursery) with associated external private space; addition of 4 residential units with associated external private space; rearrangements to ancillary rooms to suit; amendments to car parking to suit updated accommodation mix; amendment from private units to affordable rented units; amendment to flat type size and layout to meet updated HBC1 affordable rented units target mix; relocation of Core 2 and adjacent 1B2P flat type to optimise circulation elevations; amendments to elevations to reflect layout rearrangements; addition of balcony screeners (where appropriate) to avoid direct overlooking</p>	<p>Under consideration</p>

4.0 CONSULTATION

- 4.1 A Site Notice was erected on 8.10.2018 expiring on 29.10.2018.
- 4.2 Press Notice was advertised in the Harrow Times on the 11.10.2018 expiring on 8.11.2018
- 4.3 The application was advertised as a major application.
- 4.4 A total of 1443 consultation letters were sent to neighbouring properties regarding this application.
- 4.5 The overall public consultation period expired on 26.10.2018.
- 4.6 Adjoining Properties

Number of letters Sent	1443
Number of Responses Received	2
Number in Support	0
Number of Objections	2
Number of other Representations (neither objecting or supporting)	0

- 4.7 2 objections were received from an adjoining resident.
- 4.8 A summary of the responses received along with the Officer comments are set out below:

Summary of Comments	Officer Comments
Six to fourteen storey building totally inappropriate for this area	Issues relating to the height have been discussed under 'Impact on Protected Views' and 'Character and Appearance of the Area' sections of the officer's report below.
Promise of urban regeneration improving the local area and environment is turning into the prospect of a new urban Legoland being created driven by vested interests in housing targets and developer greed.	As noted in the officer's report below, the site is urban in character given its location and extant outline permission. Government policy is clear that more housing is needed to meet the demand and higher density housing subject to proper infrastructure in place should be directed on brownfield land.

<p>What is happening about road and traffic management with even more residents and cars coming into an already congested area.</p>	<p>The proposal is not only for housing but will also deliver a new healthcare facility which will provide a necessary social infrastructure to support the masterplan site and the wider community.</p> <p>The level of car parking proposed for this development is low to ensure very low levels of impact upon surrounding road.</p>
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4.9 Statutory and Non Statutory Consultation

4.10 The following consultations have been undertaken:

LBH Environmental Health
LBH Highways
LBH Planning Policy
LBH Design
LBH Conservation Officer
LBH Tree Officer
LBH Biodiversity Officer
LBH Education
LBH Housing
LBH Landscape Architects
LBH Economic Development
LBH Lighting Section
LBH Waste Officer
LBH Energy
GLA
TFL
EDF Energy (Network PLC)
Historic England – GLASS
NHS Harrow
Environment Agency
Designing Out Crime Officer, Metropolitan Police Service
Thames Water Authority
Natural England
Campaign for a Better Harrow Environment
Affinity Water

4.11 External Consultation

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

Consultee Summary of Comments	Officer Comments
<p>GLA Full Stage 1 Report dated 19.11.2018, including follow up email response from the GLA appended at the back of the officer's report.</p> <p>Concluding remarks: Whilst scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan for reasons set out below:</p> <p>Principle of Development: The optimising of land and contribution towards housing delivery and social infrastructure is strongly supported.</p> <p>Affordable Housing: The application proposes 43.6% affordable housing by habitable room (65:35 split in favour of affordable rent), which would increase the overall level of affordable housing across development Zone A from 21.5% to 25%. Following the findings of an independent review the maximum level of affordable housing must be provided. Early and late stage review mechanisms must also be secured.</p> <p>Urban design & inclusive access: The proposed development has been generally very well considered in accordance with London Plan policy 6.10 and draft London plan policy D7, further consideration is nevertheless required in terms of the public realm along Headstone Drive and how this interacts with the entrance to the healthcare facility.</p> <p>Energy: The energy strategy does not fully</p>	<p>Noted – officer response provided in body of report</p>

<p>accord with London Plan policies 5.2, 5.6, 5.7 and 5.9. Further information regarding energy efficiency, overeating, the site-wide network, district heating and renewable energy is required. The final agreed energy strategy should be appropriately secured by the Council, along with contributions towards off-site mitigations.</p> <p>Flood risk: The approach to flood risk management for the proposed development complies with London Plan policy 5.12 and draft London Plan policy SI.12. A revised surface water drainage strategy is required to reflect greenfield runoff rate and additional attenuation storage volume calculations and SuDs maintenance information is required in accordance with London Plan policy 5.13 and draft London Plan policy SI.13. Water consumption targets should be revised in line with London Plan policy 5.156.7.</p> <p>Transport: Whilst the proposal improves connectivity and conditions for pedestrians in several respects, the proposal is not yet fully in line with London Plan policy and minor revisions are necessary. Various planning conditions and section 106 obligations should also be secured.</p>	
<p>Designing Out Crime Officer The risk of crime within both the public and non-public areas of the proposed development, and the interaction between the two, should be considered at the outset and preventative measures made.</p> <p>The crime map has highlighted that the following crimes were reported in the area and that the area is experiencing a high volume of anti-social behavior, burglary, violent crime and motor vehicle crime.</p> <p>The development should achieve a Secured By Design accreditation so long as the advice has been followed.</p> <p>The communal, cycle and bin store doors</p>	<p>Noted – A condition will be attached requiring the applicant to achieve Secured by Design accreditation.</p> <p>All doors to the cycle storage are shown to be single leaf.</p> <p>With regard to the bins stores, given the size of the bins and to allow sufficient manoeuvring space for the management</p>

<p>must be large single leaf doors with the relevant security testing certificates. If double leaf doors are used, there will be a weakness in the security of the building(s) which may lead to crime and anti-social behavior issues.</p> <p>The entrances to the podium levels must also be gated with security tested products with electronic key fob access. There must be no public access to these areas.</p> <p>I would therefore seek to have a planning condition submitted where this development must achieve Secured by Design accreditation.</p>	<p>operators, it is not practical to incorporate single leaf doors.</p> <p>In terms of the access to the podium, this will be time managed by the applicant to allow public access during certain times.</p>
<p>Transport for London</p> <p>Full consultation response is appended at the back of this report. First response dated 7.11.2018.</p> <p>Email dated 3.1.2019 also appended.</p>	<p>The responses to each of the points made have been addressed in the officer's report below under the 'Traffic, Parking, Access, Servicing and Sustainable Transport' section.</p>
<p>Thames Water</p> <p>Foul water network connection – no objection. TW are aware of some constraints in the vicinity of the proposed development, however we are confident that associated upgrades can be delivered in time to serve the development. Therefore will not be seeking a planning condition relating to foul water network matters.</p> <p>No objection with regard to surface water infrastructure capacity.</p> <p>Expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. TW would like an informative to be attached.</p> <p>Water supply comes within the area covered by the Affinity Water Company.</p>	<p>Noted – appropriate conditions and informative attached.</p>

<p>TW will require points of connection to the public sewer, for both foul and surface water, as well as the anticipated flows.</p> <p>The surface water drainage strategy for the development should follow policy 5.13 of the London Plan.</p>	
<p>Natural England No comments to make on this application.</p>	Noted
<p>LB Drainage Authority The Flood Risk Assessment submitted is satisfactory, however detailed drainage design is required. Full drainage design details should be submitted in line with our drainage requirements attached. Please be advised that Surface Water Disposal, Foul Water Disposal, Surface Water Attenuation and Storage design details can be conditioned.</p> <p>Insufficient information is provided regarding proposed Parking. Permeable materials should be used for all proposed parking and hardstanding. The applicant should submit a cross section of the permeable material construction with full details and their maintenance plan for our approval.</p>	Noted – addressed below and suitable conditions recommended.

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, The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan (AAP) 2013, the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan SALP 2013 [SALP].
- 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 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.

6.0 ASSESSMENT

6.1 The main issues are:

- Principle of the Development
- Regeneration
- Impact on Protected Views
- Character and Appearance of the Area
- Residential Amenity, Quality, Noise and Accessibility
- Housing Provision and Affordable Housing
- Housing Density and Unit Mix
- Provision of Healthcare
- Traffic, Parking, Access, Servicing and Sustainable Transport
- Development and Flood Risk
- Trees, Ecology and Biodiversity
- Sustainability and Climate Change Mitigation
- Land Contamination and Remediation
- Air Quality
- Environmental Impact Assessment
- Statement of Community Engagement
- S.106 Obligations and Infrastructure

6.2 Principle of Development

- 6.2.1 The subject site is located within the “Heart of Harrow” which encompasses the two town centres of Harrow and Wealdstone, the Station Road corridor linking the two centres, and the industrial land and open spaces surrounding Wealdstone, including the Kodak site, Headstone Manor and the Harrow Leisure Centre.
- 6.2.2 The Heart of Harrow is now designated as an Opportunity Area in the 2016 version of the London Plan and the outline permission granted under P/2165/15 was approved on the basis of this designation. The Opportunity Area designation is expected to contribute to the delivery of 3,000 jobs and a minimum of 2,800 new homes within the Area through higher density residential and mixed use development on key strategic sites.
- 6.2.3 In addition to being an Opportunity Area, the entire Heart of Harrow is also designated as a Housing Zone, which seeks to help unlock the potential to deliver more than 5,000 new homes over the plan period. Housing Zones are designed to work flexibly depending on the local circumstances, however all new developments would need to be built to high quality standards and in compliance with all relevant policies contained within the development plan. In particular, proposals will need to demonstrate how new homes will come forward in a master planned approach, delivering strong communities through urban design and achieving a coherent neighbourhood.
- 6.2.4 The principle of redevelopment of the 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 redevelopment of the former factory site. As such, the principle of development on Plot A3 is supported.
- 6.2.5 The wider masterplan 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 former factory site.
- 6.2.6 The approved masterplan plan under P/2165/15 divides the site into four different development zones, which are further split into development plots. Whilst the masterplan was granted outline permission with all matters reserved, there are certain parameters that are fixed under this outline permission, which includes the amount of open space to be provided, the heights of the buildings, access point and primarily route through the site. The parameter plans also fixes the floor spaces for different uses to be provided within each development phase and the number of residential units.
- 6.2.7 This application relates to Plot A3 located within Development Zone A of the Harrow View East masterplan approved under application P/2165/15 and is situated on the south eastern cleared part of the Zone A site, adjacent to Headstone Drive and Rokeby Road. As noted under the planning history section, the outline permission grants permission to deliver up to 1,800 new homes on this

site, new employment floor space of up to 32,360sqm, a new 3 form entry primary school, up to 10,230sqm of senior living/ assisted care accommodation, a food store (up to 2,000sqm), flexible commercial floor space (up to 2,000sqm), commercial leisure, community floor space, health centre, energy centre, associated new streets, highway improvements, multi-storey car park, open space and associated landscaping.

- 6.2.8 Also as noted under the history section of this report, Development Zone A has reserved matters approval under P/4610/17 and will deliver 650 new homes, all of the commercial floor space including the food store, healthcare floor space, a care home and a school, alongside circa half the overall green link approved under the outline permission. The green link is strategically important, forming a new route from Wealdstone town centre through the Harrow View West site to Headstone Manor. Development Zone A of the approved masterplan would form the gateway to the wider masterplan site and accordingly this phase comprises the densest part of the masterplan with the tallest element (at 12 storeys) of the master plan located along the eastern edge of Plot A1.
- 6.2.8 Under the reserved matters application P/4610/17, Plot A3 was brought forward as two parts. A3(a) situated on the southern half of this plot sought approval for matter relating to scale only for a 5 storey building comprising a care home with an approx. floor area of 5,054sqm. The northern section of Plot A3, known as A3(b) sought approval for all matters for a 6 storey building that would comprise 30 residential apartments.
- 6.2.9 However, since the approval of the aforementioned reserved matters, it became apparent that the floor area designated for the healthcare facility within Plot A5 was not sufficient for NHS Harrow Clinical Commissioning Group (CCG). Furthermore, the applicant, despite many months of marketing the care home on Plot A3, could not find an operator for the proposed care home. Given the lack of interest from any provider for the care home, and in light of CCG's requirement for a much larger facility, Officers consider that the principle to locate the larger healthcare facility on to Plot A3 can be supported and would meet the aspirations of the wider masterplan to bring forward mix and balanced community facilities to serve the new neighbourhood and the wider locality. The loss of the care home floor space (private tenure only), in light of the lack of interest from operators is not considered to undermine the overall aspirations of the wider masterplan site.
- 6.2.10 Whilst as discussed in detail below, the height of the buildings would be outside the maximum parameters approved under the outline permission P/2165/15, the increase in height and likewise the increase in density on this plot would be supported in strategic terms by optimising site potential and density through high quality design. Furthermore, the increase in density on this site is appropriate at this location given the Housing Zone designation and the site being located within Harrow and Wealdstone Opportunity Area.

6.2.11 In view of the above, it is considered that the proposal would meet aspirations of paragraphs 117, 118 and 124 of the NPPF, policies 2.13 and 3.4 of The London Plan (2016), policies GG2 and H1 of the draft London Plan (2017), policies CS1 and CS2 of the Harrow Core Strategy (2012) and policies AAP3, AAP4 and AAP5 of the Harrow and Wealdstone Area Action Plan (2013) and therefore the proposed development is acceptable in principle.

6.3 Regeneration

6.3.1 It is inevitable that the character of the area will significantly change through the intensive urbanisation of the area as a result of the high density of development. However, the increase in density in this location is vital to support the wider regeneration of Wealdstone Town Centre and its surrounding area through sustained economic growth and job creation.

6.3.2 As noted above, the subject site sits within the wider masterplan area and would support the wider aspirations of the masterplan site through delivering high quality development and mixed communities. The cumulative proposals delivered on this strategic site would not only in itself regenerate the immediate area, but would release essential contributions, already secured under the outline permission P/2165/15 to enable the Council to improve the surrounding public realm and the connectivity between the site and Wealdstone Town Centre, all of which are considered integral to ensure the successful regeneration of the local area.

6.4 Impact on Protected Views

6.4.1 The south-eastern corner of Plot A3 sits within the Old Redding viewing corridor which provides a long distance panorama across central London. Most notably Harrow on the Hill and St Mary's Church are key views from this open space. The Kodak factory is also visible from this view. The chimney of the former powerhouse situated within Development Zone D of the wider Harrow View East masterplan site has a height of approx. 64.6 metres, as such, the presence of the former factory can be viewed at a number of local vantage points and from a number of distant points from higher ground. From the roof top of the now part demolished factory itself views of Harrow Hill, St Mary's Church, Wembley Station and distant views of London itself can be observed.

6.4.2 The height of the shortest tower (core B) would fall well below the maximum height allowed above ordinance datum within the main protected viewing corridor. The other two towers (cores A and C), the former being the tallest at 14 storeys, would be situated within the wider viewing corridor consultation area and the heights of these towers would also be within the height restriction allowed above ordinance datum for the wider consultation area.

6.4.3 Whilst noting that there will be a change within the townscape views, the changes to the landscape panorama associated with the form of development outlined would not, Officers consider, erode the fundamental qualities of these views. The scale and development typologies would instead reflect the sites strategic location, within the Heart of Harrow AAP area.

6.4.4 Based on the above, the proposal would not give rise to any conflict with policy AAP8 of the Harrow and Wealdstone Area Action Plan (2013) and policy DM3 of the Development Management Policies Local Plan (2013).

6.5 Character and Appearance of the Area

6.5.1 This scheme has been extensively developed through detailed pre-application discussions held with Officers, the Design Project Officer and external design consultants.

6.5.2 The scheme has been presented to two different design review panels and has also had a chair review of the scheme. Through each stage of the review proposal the applicant has sought to develop the scheme further in response to comments raised.

6.5.3 The original outline permission under P/2165/15 set height parameters for the entire masterplan plan site. For Plot A3 the height range was set at 5 storeys fronting Headstone Drive, increasing to 6 and then 8 storeys. Whilst elsewhere within the masterplan plan site the height goes to the maximum height to 12 storeys, but this is located within the eastern section of the wider masterplan site. However, through the design review process during the earlier stages of the detailed reserved matters applications stages, it has been established that there is opportunity to introduce further height along the green link to strengthen its legibility and define the edges more clearly.

6.5.4 Whilst it is noted that at 14, 8 and 6 storeys, the heights of the blocks exceed the parameters set by the previous masterplan, the massing has been manipulated sensitively in order to open up the block and create a more penetrable form. The tall element is to the rear of the plot, and will not impact on the surrounding existing context. The tower echoes the height of some of the other taller elements in previous phases, and makes a valuable contribution to the overall massing of the site, helping to bring definition to this area of the site and break up the uniformity of the mid-rise massing. The heights of the blocks fronting Headstone Drive have been sensitively designed to step up and better relate to the adjoining built form along Headstone Drive, also located within the wider masterplan, providing more varied massing along this street frontage and also marking the gateway into the green link.

- 6.5.5 This does set a different massing strategy on the northern side of Headstone Drive compared to the southern side of Headstone Drive which is largely characterised by two/ three storey built form. However, the separation distance provided by the carriageway of Headstone Drive, together with the fact that the development site sits within a wider masterplan site, in which it relates well to, the massing strategy of the wider neighbourhood would strongly relate to the more muscular built form of the former factory site. Therefore the massing would appropriately relate to the former industrial legacy of the factory site. Furthermore, it is not uncommon to see taller buildings within transitional urban to sub-urban context, in particular with regard to development plan policies that are geared to deliver higher densities through maximising site potential and achieving high quality exemplary design.
- 6.5.6 The relationship with the adjacent green link has been considerably improved by creating a more active edge to the eastern face of the block. The strategy to exploit the triangular nature of the site with three blocks, one at each point, has turned a challenging site into an opportunity to create a distinctive piece of architecture for this very prominent part of the site. The layout would provide residential cores on each corner of the plot and therefore activating all sides of the site.
- 6.5.7 The buildings will be constructed in brick with concrete balconies, cills and ground level planter edges. The elevations have been designed with considerable care and sensitivity. This proposal is an example of very high quality architecture. It complements the design of the surrounding plots, but brings a much needed new character to the place.
- 6.5.8 The blocks have a number special details and finishes that provide articulation to the building facades. In order to distinguish the ground floor healthcare facility, it is proposed to use special glazed brick surfaces and large fixed windows, entrance canopy with special signage to signify the more public function to the building. It is vital that these are locked in to ensure that the high quality detail is carried through the build programme. For this reason, it is recommended that the original architect and their design team are retained to ensure that the design quality is safeguarded through the detailed construction phase. Similarly, all materials and details would be conditioned e.g. brick, balcony details, windows and window reveals, canopies, window cills, coping materials and details, railings and gates, doors to ensure a high quality finish.

Landscaping

- 6.5.9 In terms of landscaping, the public realm has been designed as a fundamental part of the overarching strategy for the whole plot. The permeability of the courtyard is a strong move, and routes from street through varying degrees of public, communal and private spaces have been carefully conceived. Each core will have direct access to the generous shared garden on the podium which provides different forms of amenity suitable for all ages.

- 6.5.10 The edges around the plot have been designed with an equal level of skill, and the proposal as a whole will make a very positive contribution to the site and the wider neighbourhood. Appropriate landscaped buffers would be provided for the maisonettes and privately accessed apartments along the ground link. Likewise, a landscape buffer would be provided along the Headstone Drive frontage to provide defensible space for the healthcare consultation rooms and would also provide streetscape along this frontage.
- 6.5.11 Overall, the landscaping strategy proposed would integrate with the wider masterplan site and would provide a high quality finish. The detailed landscaping strategy and detailed planting together with the maintenance and management plan will be secured by condition.

Refuse

- 6.5.12 The proposed plans show designated refuse stores for each of the building cores and the maisonettes located along the green link. Core A requires the provision of 16 bins in total to serve the number of units in that block, but only 11 bins are shown on plan. Core C requires 8 bins to serve this block, but only 7 bins are shown on plan. However, the bin stores are large enough to accommodate the additional bins required, but would require on-site management to ensure that the bins are rotated.
- 6.5.13 On this basis, it is considered appropriate to attach a condition requiring a revised plan showing sufficient bin numbers for the bin stores serving Cores A and C. Bins located in the stores fronting the green link and Core B will be brought out to the holding area near Rokeby Road on collection day. This is considered to be acceptable and a condition is recommended to ensure that the bins other than on the day of collection, are stored in the designated stores at all times. In addition to this, as no details have been provided for the refuse store and number of bins for the healthcare facility, this is also secured by condition. Subject to the revised details, it is considered that the proposed development would meet the requirements of policies DM1 and DM45 of the DMP.

External Lighting

- 6.5.14 In terms of external lighting, the applicant has submitted a lighting strategy which sets out the proposed lighting levels, luminaire type and column type proposed for the outdoor public areas and undercroft parking areas. Overall, the lighting strategy for the buildings and landscape work together to light and define spaces around the scheme as an appropriate level. Entrances to the cores would be illuminated with canopy lighting to define their presence on the street, and creating legible and safe entrance lobbies. Similarly, canopy lighting is proposed for the health centre. The lighting strategy for the podium would be similar to that already approved (and subject to detailed condition) on the wider Zone A site. In order to reduce obtrusive lighting and light pollution, the luminaries proposed would be focused to the area which they are designed to light. Overall, subject to a condition requiring detailed specification of the light fixtures and their locations, the lighting strategy is considered to be acceptable.

6.5.15 In conclusion, the proposed development, subject to the imposition of appropriate conditions would achieve a high quality form of development which would be further enhanced by the landscaped strategy which will knit together with the wider masterplan and mark the gateway into the green link. It is considered that the proposals would meet the high quality design and landscape aspirations set out under paragraph 124 of the NPPF (2018), policies 7.4B, 7.5, 7.6B and 7.7 of the London Plan (2018), policy CS1 of the Harrow Core Strategy and policies AAP4, AAP6 and AAP7 of the Harrow and Wealdstone Area Action Plan (2013).

6.6 Residential Amenity, Quality, Noise and Accessibility

6.6.1 There are no specific policies within the AAP which deal with safeguarding residential amenity but it states that development proposals would be required to meet 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”. Policies DM27 relating to amenity space and DM28 children and young people’s play facilities are also applicable.

6.6.2 Policy 3.5C of The London Plan requires all new residential development to provide, amongst other things, accommodation which is adequate to meet people’s needs. In this regard, minimum gross internal areas (GIA) are required for different types of accommodation, and new residential accommodation should have a layout that provides a functional space. Table 3.3 of The London Plan specifies minimum GIAs for residential units and advises that these minimum sizes should be exceeded where possible. The 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. The use of these residential unit GIA’s as minima is also reiterated in Appendix 1 of the Residential Design Guide SPD. This is supported by policy AAP13 of the AAP.

6.6.3 *Defining good places*

The redevelopment of this site would contribute positively towards the wider urban renewal of this part of Wealdstone and in terms of the wider Harrow View East masterplan site. The provision of the healthcare facility along the Headstone Drive frontage would activate this section of the masterplan site and would meet the aspirations of the wider masterplan to create a new mix use community on the former factory site. The revised proposals for Plot A3 would allow for better street presence and activation along the green link and would enhance the gate way into the green link.

6.6.4 *Communal outdoor amenity space*

The proposal would make provision of podium level amenity space to serve development and roof top terraces for the three maisonettes fronting the green link. In addition to this, residents will also have access to the central green square and green link which would provide additional communal outdoor amenity space. Overall, it is considered that the different forms of communal space being offered would be a benefit of the scheme and improving the environment of these properties. The space would benefit from high levels of natural surveillance and would be of dimensions/configuration that would lend itself to domestic recreational activities.

6.6.5 *Outdoor play space*

Local Plan Policy DM28 requires on site provision of facilities where a development would result in a net increase in child yield. Applying the child yields at Appendix 1 of Harrow's Planning Obligations SPD, it is calculated that the development would yield a total 33 children across all age ranges.

6.6.6 The Council's Planning Obligations SPD, informed by Harrow's PPG 17 Study, sets a quantitative standard of 4 square metres play space per child. When applied to the above child yield, this generates a requirement for 132sqm play space across all age groups. The proposal would provide up to 732sqm of soft and hard landscaping on the podium and would include dedicated 115sqm for under 5's play space centrally located and accessible by all cores. The required space for under 5's when assessed against the Harrow's Planning Obligation SPD would be 34sqm. As such the level of play space for this age group is more than adequate. In terms of the other age groups, the wider masterplan site would provide up to 2,830sqm of dedicated play space located along the green link, green square, landscaped podiums and roof spaces, which is considered to be acceptable to meet the requirements of other age groups.

6.6.7 Whilst it is noted that the supported landscape strategy adopts the GLA's Play and Informal Recreation SPG (2012) benchmark to calculate the child yield and the resultant play space requirement. Officers consider that the Council's Planning Obligation SPD, provides a better analysis on the local play space requirement and as such has applied this in assessing this application.

6.6.9 However, following the Mayor's Stage 1 response, the applicant has provided further detailed breakdown on the required play space when using the GLA play space benchmark, which would also require approximately 132sqm in total across all age groups.

6.6.10 Overall, when assessed cumulatively with the wider masterplan site, the level of play space provision exceeds what would be required for the size of the development proposed and as such the proposals are acceptable in this regard.

6.6.11 *Entrances and approach/ active frontages*

As noted above, all communal entrances would be clearly defined with entrance canopies and appropriate ground surfacing to strengthen the legibility of the key access points. Similarly, the individual entrance to the two ground floor flats located on the ground floor of the tallest building would also have entrance canopies which would be domestic in scale and appearance. The three maisonettes along the green link would have recessed entrances with appropriate ground surfacing defining their entry points. The access to the podium from the green link would be a designed steel date to provide safe and legible access for residents.

6.6.12 All entrances would be afforded naturel surveillance from the communal open spaces and from the overlooking permitted from the development itself. The proposals in this regard are considered to be acceptable and the entrances would help define and activate the street frontages.

6.6.13 *Shared circulation*

The SPG sets out a number of guidelines for shared circulation space, which includes the numbers of units that are accessed from each core (eight units); the provision of entry phone, or audio-visual verification to the access control system where applicable; natural light and adequate ventilation where possible; in schemes with more than eight storeys the provision of two lifts; and in the case of those buildings with wheelchair units the provision of more than one lift.

6.6.14 Each core would not serve more than five flats per floor. Cores A and C would be served by two lifts as these would be 14 and 8 storeys in height respectively. Core B would be served by a single lift. All of the wheelchair adaptable units would be located in cores A and C. Whilst the Cores would not have access to natural source of lighting, given the pentagonal arrangement of the flats, the limited number of units accessed per floor and the a high proportion of dual aspect units, the lack of naturally light communal core lobbies is considered to be acceptable.

6.6.15 In regard to shared circulation, the proposals are considered to broadly meet the guidance contained in the SPG.

6.6.17 *Dwelling space standards / internal heights/ flexibility*

The minimum space standards are set out at Table 3.3 of the London Plan and are reproduced within the SPG.

6.6.18 The proposed, studios, 2 bed and 3 bed units and majority of the 1 bed units are all shown to exceed the minimum space standards. The individual rooms within the flats are of good layout and size and suitable internal circulation space is provided in all units. However there are 7 units (B.01.02; A.03.02; B.03.02; A.04.02; 1.05.02; C.06.02 and C.07.02) that are shown to have a GIA of 49.8sqm, which is a marginal shortfall of 0.2sqm from the required 50sqm. The units in all other regards would have good internal layout and would be dual aspect units. It is considered that a shortfall of 0.2sqm would have no discernible impact on the quality of the accommodation provided to warrant a refusal on such basis. In this

respect, the proposal is considered acceptable. The development would also achieve the minimum floor to ceiling height of 2.5 metres as required by the Housing SPG.

- 6.6.19 The SPG requires built in storage space to be provided in all new homes. The proposal is shown to provide an adequate level of storage space for each of the units. To ensure compliance with this standard, it is considered necessary to secure this as a condition of any planning permission.
- 6.6.20 The SPG also seeks adequate space and services to work from home. An indicative furniture layout is set out on the application drawings and this demonstrates that all of the flats would have space for a table. As such, each flat would have space flexible for dining and home study/work activities.
- 6.6.21 Policy 3.8(c) of the London Plan relating to Housing Choice, requires 90% of homes should meet building regulations M4 (2) – ‘accessible and adopted dwellings’. Policy 3.8(d) will require 10% of new housing to meeting building regulations M4 (3) – ‘wheelchair user dwellings’. The proposals would provide 10% of residential units as wheelchair adaptable units and as such the proposals would be compliant with the required building regulations. A condition is attached to ensure compliance with the regulations.
- 6.6.22 *Private open space*
The SPG requires a minimum of 5sqm per 1-2 person dwelling and an extra 1sqm for each additional occupant. In the case of the studios, 1 bed and 2 bed units, these units would have a private balcony space which would exceed the required standard recommended in the SPG. In the case of the 3 bed flats, these are shown to have an external balcony space of approx. 7.6sqm, which would be short by 0.4sqm of the required 8sqm. Given the nominal short fall, this would have no discernible impact on the amenities of the occupiers of these units. The proposed 3 bed maisonettes are shown to have roof terraces which exceed the minimum standards. In this regard, the proposed private amenity space is considered to be acceptable.
- 6.6.23 In addition to private balconies, residents would have access to private communal gardens, which is also consistent with the guidance contained in the Mayors SPG.
- 6.6.24 *Privacy*
The SPG calls for habitable rooms within dwellings to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces. Paragraph 2.3.36 of the SPG refers to yardstick separation distances of 18-21 metres between facing habitable room windows.

- 6.6.25 As a high density scheme there would inevitably be some overlooking relationships between homes within the development. These occur in elevations fronting the podium level and where buildings have stepped building lines. These elevations would, of course, all contain habitable room windows and balconies, meaning that there would be a high level of visibility between homes on the same level (i.e. looking directly across) and perceptions of visibility to/from homes on other levels within the development. Given the high density nature of the proposal, which is consistent with the need to make effective use of this accessible previously-developed site, and the likely expectations of the future occupiers of such a development, this is not considered to be unacceptable. Future occupiers choosing to live at the development are likely to have different expectations about the level of privacy afforded from such a development than those choosing to live in more traditional, suburban environments.
- 6.6.26 The design of the irregular shaped balconies would ensure that the privacy of the residential units is safeguarded. With regards to the units on the first floor that face into the podium garden, there are a number of habitable room windows that face this communal amenity area. It is considered that through appropriate soft and hard landscaping and demarcation of private terraces, sufficient privacy buffer can be achieved to safeguard the privacy of these units. The first floor of the health centre would also have views over the communal amenity area. However, the windows to this non-residential space would not directly face any habitable rooms of any residential units and therefore there would be no undue impact in this regard. Similarly, the units fronting the green link would maintain a sufficient privacy buffer from this green link through appropriate landscaping.
- 6.6.27 On balance, having regard to the high density nature of the proposal, which is consistent with the need to make effective use of this highly accessible edge of town centre site and recognising that those choosing to live in a high density development are likely to have different expectations about privacy, it is considered that the relationships between residential buildings would secure a standard of privacy that would be commensurately high for the vast majority of future occupiers.
- 6.6.28 The SPG seeks to avoid single aspect dwellings where: the dwelling is north facing (defined as being within 45 degrees of north); the dwelling would be exposed to harmful levels of external noise; or the dwelling would contain three or more bedrooms. The definition of a dual aspect dwelling is one with openable windows on two external walls, which may be opposite (i.e. front & back) or around a corner (i.e. front and side) and the SPG calls for developments to maximise the provision of dual aspect dwellings.
- 6.6.27 The scheme would provide 95.2% double/ triple aspect units which would provide exceptionally good levels of daylight and views to these units and thereby offering high quality form of internal living accommodation.

6.6.28 *Noise*

The SPG seeks to limit the transmission of noise between flats, and from lifts/communal spaces to noise sensitive rooms, through careful attention to the layout of dwellings and the location of lifts. Local Plan Policy DM1 includes among its privacy and amenity considerations the adequacy of the internal layout in relation to the needs of future occupiers, and Harrow's Residential Design Guide SPD amplifies the point by advising that the vertical and horizontal arrangement of flats within a development should avoid conflicting room-use (i.e. bedroom vs. living/other room) relationships between flats.

6.6.29 Due to the building configuration, a number of flats would have bedrooms sited adjacent to living/ kitchen areas of adjoining flats. In the case of the cores to each of the buildings, a number of habitable rooms would be sited adjacent to the lift shaft. Whilst this is not ideal, in most cases due to site constraints, this is unavoidable. However, having regard to the fact the development would be a new build, the proposal would be required to ensure that sufficient noise insulation is provided to meet Building Regulations Part E, which would ensure that any noise impact is minimised. When considered against the requirement for thermal installation also, it is considered that sufficient level of noise mitigation would be achieved to provide a good level of accommodation for future occupiers.

6.6.30 The applicant has submitted a Noise and Vibration Impact Assessment for Plot A3, which is based on the previous (and approved) Noise and Vibration Impact Assessment submitted with the reserved matters application (P/4610/17) relating to the wider Zone A site. There are no discernible changes in the current site circumstances to that prevailing at the time of P/4610/17 that would warrant a different assessment under this current application in respect of noise and vibration impact.

6.6.31 It is noted that in respect of the communal gardens and terraces, the external sound levels to these areas would be considered acceptable. With regards to balconies, those that front Headstone Drive and facing north-east side of the boundary are likely to experience noise levels that exceed the recommended criteria set out under BS8233. As per the previous reserved matters application, when considering noise impact to external amenity areas, other factors such as the desire to make efficient use of land and the convenience of living in these locations should also be considered and balanced against elevated external noise levels. Furthermore the development will make use of stacked and recessed balconies and would be of solid construction which will help reduce external noise levels.

6.6.32 In terms of internal sound levels, an External Fabric Assessment has been undertaken, similar to that previously proposed under P/4610/17. This sets out the required acoustic performance of glazing elements to achieve the required internal noise levels. Subject to the implementation of appropriate mitigations recommended in the report, the internal noise levels proposed would be acceptable.

- 6.6.33 In terms of plant noise emissions, the noise assessment survey acknowledges that external plant servicing the proposed healthcare facility is likely to be the potential source of noise. The details of plant are unknown at this stage, however, the assessment has been based on cumulative plant noise emissions i.e. worst case scenario. The report sets out the required level of noise emissions for the plant to ensure there would be no undue impact on residential amenity.
- 6.6.34 The Council's Environmental Health Team were consulted on this application, however no comments have been received. The Council's EHO did provide comments in the previous reserved matters application P/4610/17 and in general raised no objection subject to conditions being imposed to deal with the detailed specification for any mechanical plant and ventilation equipment that will be required. Given that the methodology adopted in the current assessment are the same as that adopted in the previous reserved matter application and recommended similar mitigation in terms of plant noise emissions and glazing, it is considered that subject to the imposition of suitable conditions, there would be no detrimental impact upon future occupiers of the development.
- 6.6.35 Given the siting away from the railway lines, there would be no undue impact in terms of vibration.
- 6.6.36 In conclusion, subject to appropriate conditions the proposal would be acceptable in terms of noise and vibration.
- 6.6.37 *Daylight and Sunlight*
The SPG (2016) states that "*All homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen and dining spaces should preferably receive direct sunlight*" (standard 32). Supporting paragraph 1.3.45 outlines that "*An appropriate degree of flexibility needs to be used when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties as well as within new developments themselves. Guidelines should be applied sensitively to higher development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and the scope for the character and form of an area to change over time.*" Local Plan Policy DM1 includes among its amenity considerations the adequacy of light and outlook within buildings (habitable rooms and kitchens).
- 6.6.38 An assessment of potential impacts on sunlight, daylight and overshadowing has been undertaken and accompanies the application.
- 6.6.39 For the purposes of measuring the performance of habitable rooms within the proposed development, the assessment uses the Average Daylight Factor. This method measures how much sky can be seen from the window and converts the results into a percentage of annual probable sunlight hours received. The BRE guidelines recommend that ADF values of 1% should be achieved in bedrooms, 1.5% in living rooms and 2 % in kitchens. In the case of combined living rooms

and kitchen an ADF of 1.5% has been used. The existence of balconies has also been captured within the analysis.

- 6.6.40 Of the 86 rooms assessed (only on the ground, first and second floors), 76 rooms (88%) achieve the target ADF value. In almost 60% of the rooms will actually achieve an ADF value in excess of double the respective target. Those rooms that would receive lower levels of daylight have their direct skylight restricted by balconies. However, balconies provide valuable private amenity space for the units and therefore the shortfall in the target ADF has to be balanced against providing meaningful external amenity space. As for the upper level floors, 90% of the rooms will achieve their target ADF value. Based on the above, the levels of daylight amenity will be very good.
- 6.6.41 In terms of sunlight amenity (Annual Probable Sunlight Hours (APSH)), the assessment shows that over 50% of the area of the podium will be able to receive at least 2 hours of direct sunlight on March 21st. This would accord with the BRE overshadowing guidance and the sunlight to this external amenity space would be good.
- 6.6.42 In conclusion, officers consider that whilst clearly it is desirable for a new development to achieve 100% compliance with the recommendations of the BRE guidelines, it is inevitable that a site of the proposed density will require consideration of some compromise between daylight/sunlight, the provision of highly valued residential amenity space (balconies) and other planning considerations that may influence the site layout and orientation of buildings. It should also be emphasised here that the recommended BRE guidelines for daylight and sunlight – whilst a valuable tool for measuring the degree of daylight and sunlight that would be achieved – do not form a part of the adopted development plan. Rather, Local Plan Policy DM1 requires a high standard of amenity and undertakes to have regard to a range of amenity considerations which includes, but is not limited to, the adequacy of light and outlook. While not all of the tested rooms/windows would achieve the recommended BRE standards, it is demonstrated that the majority would. Furthermore, the majority of flats would benefit from a dual aspect, and all flats would meet or exceed the London Plan minimum space standards, and have access to private amenity space. On balance, therefore, it is considered that the poor performance of some parts of the development in terms of the recommended BRE guidelines is not unacceptable.
- 6.6.43 *Amenity impacts of the proposed healthcare facility*
As already noted above, it will be necessary to condition details of any mechanical plant and ventilation to service the healthcare facility to ensure that this use would not amount to any undue impact on future residents in terms of noise. The healthcare centre would have visiting members of the public frequenting the site. Whilst the use in itself would not be a noise related use, it is recommended that the hours of operation be restricted to ensure that during unsociable hours there is no undue impact in terms of comings and goings.

- 6.6.44 In conclusion, based on the above considerations, and the imposition of appropriate conditions, it is considered that the development would achieve a high standard of quality of accommodation for future occupiers in line with the guidance and policies noted above.
- 6.6.45 *Impact of Development on Neighbouring Occupiers and Consented Scheme*
The submitted daylight and sunlight assessment considered the impact of the proposed development on the properties located directly opposite on Headstone Drive (nos.142-182 (evens only)), Plots A2, A4 and A5 of the consented reserved matters scheme and the proposed scheme located on Plot A6.
- 6.6.46 Nos. 142 to 182 Headstone Drive are located to the south of Plot A3 and comprise two storey terraced dwellings. The daylight analysis concludes that these properties will still continue to enjoy adequate daylight. Therefore the development will have an acceptable relationship with the properties located opposite. As the windows to Nos. 142 to 182 Headstone Drive have north facing windows there would be no impact in terms of sunlight.
- 6.6.47 In terms of the consented scheme for Plots A2, A4 and A5, the same number of rooms that previously achieved compliant levels of internal daylight in the reserved matters application would continue to do so as a result of the proposed scheme. Although, it is noted that three rooms that previously did not meet their target value would experience further reductions by 0.1-0.2% ADF. The change is very minor and considered to be acceptable given the context of the site. In terms of sunlight, as Plot A3 is located to the west and southwest of these Plots, there are a number of rooms that would experience reduced levels of sunlight just below the target value. However, overall the levels would remain acceptable and commensurate with urban residential development.
- 6.6.48 In terms of the school located on Plot A6, it is acknowledged that the facade facing the development site would be affected in terms of daylight and sunlight. However, given the irregular plot boundary to Plot A6 and the narrowest section of the plot fronting the subject site, it is considered that the internal layout of this building is most likely to contain secondary glazing. Notwithstanding this, the school would not have the same level of protection in terms of daylight and sunlight that would be afforded to a residential development.
- 6.6.49 In terms of overshadowing to the green link, the assessment shows that over 50% of the area of the green link will be able to receive at least 2 hours of direct sunlight on March 21st. This would accord with the BRE overshadowing guidance and the sunlight to this external amenity space would be good.
- 6.6.50 In conclusion, the proposed development whilst would introduce a high density form of development within close proximity to existing buildings, 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. It is considered that the proposal would give rise to no conflict with the development plan policies stated above.

6.7 Housing Provision and Affordable Housing

- 6.7.1 Policy CS1.J of the Harrow Core Strategy 2012 sets an aim for 40% of new housing development in the borough to be affordable housing and states that the Council will seek the maximum reasonable amount of affordable housing on all development sites with a capacity to provide for ten or more units having regard to various criteria and the viability of the scheme. Such requirements are in line with London Plan policy 3.12.A/B which requires the maximum reasonable level of affordable housing to be provided.
- 6.7.2 Policy 3.11A of The London Plan sets out that of the 60% of the affordable housing should be for social and affordable rented accommodation and 40% for intermediate rent or sale of the overall affordable housing provision on any given development site. This is reinforced under policy AAP13(C).
- 6.7.3 Supplemental to the above policies the Mayor has produced Homes for Londoners – Affordable Housing and Viability SPG which aims to provide guidance on ways to speed up planning decisions and increase the amount of affordable housing delivered through the planning system. The SPG sets out the different threshold approach to viability appraisals. The first of which is the ‘fast track route’ (Route B) in which if the scheme delivers 35% of affordable housing, does so without any public subsidy and meets the specified tenure mix and other requirements and obligations, are not required to submit viability information. Schemes which do not meet the 35% threshold or require public subsidy, will be required to submit detailed viability information (Route A). The 35% of a scheme as affordable housing is based on habitable rooms. Under both Routes an early review mechanism will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted. A further late (near end of development) review would also apply in the case of proposals coming forward under Route A, which is applied once 75% of units are sold. Where a surplus profit is identified this should be split 60/40 between the LPA and developer and should be in form of contributions towards off site affordable housing provision. This would need to be secured legally through the section 106 agreement, which should also set out an agreed Benchmark Land Value that would form the basis for a comparison should an early review be triggered.
- 6.7.4 The applicant is London and Quadrant, and according to the supporting documents submitted, it is an affordable housing provider with a proven track record in delivering and managing mixed tenure and mixed-use developments.
- 6.7.5 It is noted that under the Mayor’s Fast Track Route set out in the Affordable Housing and Viability SPG a Financial Viability Assessment (FVA) would not be required if 35% of affordable housing is being provided, it further sets out that a minimum proportion of 30% of each tenure type should be achieved with the remaining 40% left to the LPA to determine what tenure type is required. As stated above, Harrow seeks the proportion split of 60% affordable rented and 40% intermediate housing in line with its adopted local policies.

- 6.7.6 The scheme as submitted, proposes the provision of 40% affordable housing units on the additional units provided on this site and would provide a tenure split of 60/40 in line with the adopted policies. The affordable units would be located on the wider Zone A site located on Plots A5, A4 and A1.(c). Under the extant reserved matters approval Plot A3 was consented for 30 residential units with 20% (6 units) provided as affordable housing as part of the wider Zone A provision of 21% of affordable housing. Under the reserved matters approval (P4610/17) 140 affordable units were secured as affordable housing. As a result of this scheme, an additional 43 units achieved through changing the tenure of the units from market tenure to affordable tenure would be secured, thereby providing an overall quantum of 183 units as affordable housing. When broken down, this would equate to 61% rented and 39% intermediate, which is in accordance with the Council's preferred tenure split. Overall, this would increase the affordable housing on the wider site from 21.5% to 25% which is welcomed.
- 6.7.7 The applicant has submitted a financial viability appraisal (FVA) for the development site as the applicant will be utilising grant funding in order to facilitate the delivery of 40% affordable housing. The appraisal concludes that the land value return is below the benchmark land value and thus would be deemed unviable. However, despite this, the applicant is committed to bringing the scheme forward. However, the appraisal is based on grant funding being available, in the absence of such funding, the scheme would return a negative land value and thus the proposal would not be deliverable.
- 6.7.8 The Council has tendered an external review of the applicant's FVA and a full report on the assumptions used including the independent assessment on the applicant's FVA conclusion is pending. The Council's independent assessor is still awaiting clarification on the cost inputs and once this has been provided, a full report can be issued. Depending on the findings, whilst the level of affordable housing provided on the site would be policy compliant, the cost inputs could impact upon the residual valuation generated from the development appraisal, which in turn could produce a surplus. Any such surplus would need to be captured within the current valuation and if additional affordable housing could be secured on the wider Zone A site then this would need to be factored in.
- 6.7.9 On this basis, given that the proposal would secure a policy compliant scheme in terms of affordable housing and that the outstanding matters relating to cost would not alter this position, Officers request that power is delegated to the Chief Planning Officer to allow resolution of all matters relating to the viability report and the legal agreement. Furthermore, the Council's Enabling Officer is satisfied with the level of affordable housing being provided, the tenure split and the unit mix provided.
- 6.7.10 In conclusion, notwithstanding the outstanding matters relating to the cost inputs, it is considered that the level of affordable housing being offered would accord with policies 3.11 and 3.12.A/B of The London Plan 2016, policy CS1.J of the Harrow Core Strategy 2012 and policy AAP13 of the AAP and the Mayor's SPG.

6.8 Housing Density and Unit Mix

- 6.8.1 London Plan policy 3.8 and policy AAP13 of the AAP require new development to provide a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups. London Plan policy 3.4 sets out a range of densities for new residential development. It is noted that the emerging draft London Plan removes reference to the use of density matrix and seeks to optimise the potential of housing delivery on all suitable and available brownfield sites, in particular on sites with public transport accessibility levels (PTAL) 3-6 or which are located within 800 metres of a tube station, rail station or town centre boundary.

Density

- 6.8.2 The site is considered to be within an Urban Location and has a moderate PTAL of 3.

NB: *Urban area are defined as areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial route.*

- 6.8.3 The London Plan sets out at Table 3.2 appropriate densities for various different areas. Table 3.2 sets out that a density range of 70-170 units per hectare and 200-450 habitable rooms per hectare would be most appropriate for this site. The development proposes a density of 264 u/ha and 729 hr/ha, which would exceed the density range set out in the London Plan 2016. However, whilst the density range exceeds the current London Plan standards, the emerging London Plan removes the requirement to base densities on a density matrix, but requires the local plan to adopt a site specific density assessment based on optimising development potential within sustainable locations with a PTAL range of 3-6. In view of this, it is considered that the density of development would achieve the aspirations of the emerging London Plan and would seek to optimise the development potential on this brownfield site within the Harrow and Wealdstone Opportunity Area and Housing Zone. Furthermore, given its proximity to the district centre and underground/ rail station, Officers consider that the density of development proposed on this site can be supported and overall consider that the proposals would meet the aspirations of the current and emerging development plans.

Unit Mix

- 6.8.4 The development would largely provide one-bed and two-bed units, with a small proportion of three-bed units as set out in the table belows:

	Studios	1 Bed	2 Bed	3 Bed	Total
Private	2	42	55	17	127

	1 Bed	2 Bed	3 Bed	Total
Rented	2	16	14	32
Intermediate	6	8	3	17

- 6.8.5 For a scheme of this scale and location which is likely to be attractive to small family or professional groups, it is considered that the units would be appropriate and would accord with development plan policies.

6.9 Provision of Healthcare

- 6.9.1 Policies 3.2, 3.16 and 3.17 of the London Plan seek to improve and address health inequalities, ensure that there adequate social infrastructure to meet the population growth, in particular with regard to major developments and regeneration areas. This is supported by policy CS1.Z of the Core Strategy and policy AAP3 of the AAP.

- 6.9.2 The extant reserved matters application, secured the provision of circa 700sqm of healthcare floorspace which is located within the ground floor of Plot A5. Following the approval of this reserved matters application, NHS Harrow CCG identified that the quantum of floorspace proposed to be provided would not be sufficient to meet the needs of the CCG. Given that the marketing undertaken for the Care Home on Plot A3 showed no serious interest, it was agreed that the best option would be to provide a larger health care facility in Plot A3 in place of the Care Home.

- 6.9.3 The healthcare facility would front on to Headstone Drive and would aid to activate this street frontage. It would be split over two floors, however, it is anticipated that ground floor would comprise the reception, waiting area and consultation rooms. It is considered that the facility could cater for both the new community created on the wider masterplan site and a catchment outside of the development boundary and therefore providing a wider community benefit.

- 6.9.4 Overall, it is considered that the provision of a larger healthcare facility would secure the necessary social infrastructure required to support the wider mixed use community derived from the redevelopment of the wider masterplan site and as such would be in accordance with the policies stated above.

6.10 Traffic, Parking, Access, Servicing and Sustainable Transport

- 6.10.1 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. This is echoed in London Plan policies 6.3, 6.9 and 6.13, Policy AAP 19 of the AAP and policy DM42 of the DMP. 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.
- 6.10.2 The applicant has provided a transport assessment to assess the impact of the proposed uplift in unit numbers on this site and the provision of a 1,400sqm health care facility. The wider Zone A site falls within PTAL range from 4 to 2. Plot A3 has a PTAL score of 3 (moderate). Notwithstanding this, there are bus and rail services within a short additional waking distance.
- 6.10.3 Vehicle access will be from Rokeby Road to the west of the subject site.

Traffic Impact

- 6.10.4 The transport assessment included the transport impact upon existing Headstone Drive priority junction with Rokeby Road and it was found that the junction would continue to operate within capacity following occupation of the proposed development.
- 6.10.5 The trip data analysis undertaken across all travel modes concludes that the development will generate a total of 83 external trips in the AM peak and 90 external trips in the PM peak and that these trips can be sufficiently accommodated within the local existing bus and rail capacity. TfL have commented on this scheme and is satisfied that the trip generation of the site will be consistent with the consented scheme and therefore the proposals will have no additional strategic transport implications beyond that what has already been considered for the wider masterplan site. The Council's Highways Authority is content with the assessment provided.

Access/ Parking Layout

- 6.10.6 As noted above, the main access to the undercroft parking will be off Rokeby Road. Whilst the principle of the new access point is supported, TfL and the Stage 1 response from the GLA have raised some concerns over the access and turning arrangement. In particular, concerns have been raised with the proximity of cars in relation to the proposed Primary School which will be located on Plot A6. The swept paths of parking manoeuvres are unacceptable on safety grounds and the trees proposed for the entrance of the car park will interfere with the visibility splay. The GLA stage 1 response recommends the removal of some of the parking spaces and relocation of the trees to reduce the risk to pedestrians.

6.10.7 The applicant's transport consultant in response to TfL and GLA stage 1 comments has provided additional swept path analysis that demonstrates that vehicles are able to enter and exit the spaces without the need for manoeuvring back and forth. Whilst TfL still have reservations over the first parking space through the entrance, the Council's Highways Authority has not raised any concerns over the layout. Furthermore, Officers would resist the loss of designated parking space for the healthcare facility as the provision provided is the minimum needed to service the development. However, the applicant's response with respect of the street trees still remains a concern and the Council's Highways Authority would prefer that these trees are located elsewhere. Officers consider that this can be dealt with by the landscaping condition.

Car Parking

6.10.8 It is intended to provide 19 parking spaces for residential use located within the podium, of which 4 spaces would be for disabled users. This equates to a parking ratio of 0.15. There will also be two spaces for the parking of motorcycles. The healthcare facility will have its own 8 parking spaces off Rokeby Road near the front entrance to the residential car park undercroft. These spaces would be allocated for GP's, nurses and other health care staff. In addition, a further two spaces would be provided for the healthcare facility on the wider masterplan site in front of Plot A5. Visitors to the healthcare facility will be able to utilise the existing Pay & Display bays located on Headstone Drive located to the west of Rokeby Road. The level of parking proposed, including the number of disabled parking bays is considered to be acceptable. However, the allocation of disabled spaces would need to be managed through a Parking Management Plan and these spaces should not be sold or leased with a particular flat. Likewise, the allocating of the general spaces should also be set out in the management plan. A condition is recommended to this effect.

6.10.9 The development itself is not within an existing controlled parking zone; therefore, residents will not be eligible for permits for any surrounding zone by default. Notwithstanding this, as the Council will be seeking to adopt the Primary Street on the wider masterplan site and potentially Rokeby Road, it is considered that an obligation secured through the section 106 agreement is reasonable to restrict future residents from applying for parking permits should the Council introduce a controlled parking zone for the wider masterplan site in the future.

6.10.10 In terms of the electric vehicle charging points, the proposal would include 20% active electric charging car parking spaces and 20% passive car parking spaces, which is in accordance with policy 6.13 of the London Plan. The transport assessment states that "L&Q offer the provision of active electric charging points for 20% of residential parking bays with additional 20% of bays with passive provision, subject to resident take-up within 3 months of marketing the units. The charge point will be installed at the cost of the resident who requests the space. Should the offer of electric charging not be taken up for some spaces, these spaces will then be sold without electric vehicle charging provision."

6.10.11 However, the Council's Highways Authority has requested that the 3 month time limit for take up of passive electric vehicle charging points is removed and a suitable pre-occupation condition is applied requiring the correct amounts of EV charging points ideally based on the draft London Plan standards of 20% fully active provision and the remaining 80% to have passive provision, this should also apply to the operational parking for the Health Centre which should be fully active charging. The point of installing passive provision is to ensure that the facility is there for the future, in order to meet growing demand. It also needs to be explicitly clarified as to whether spaces are leased or sold as the document refers to both. As per London Plan standards, the Council would expect them to be leased as this would mean that spaces can be re-allocated when flats are sold on or re-let or if a resident decides that they no longer want to own a car. As above, the Council would expect the developer to bear the cost of activating passive charge points in order to encourage the use of electric vehicles; details should be set out in a car park management and enforcement plan which can be secured via pre-occupation condition. A condition is attached to this affect.

6.10.12 The GLA stage 1 response has stated that a disabled parking bay should be provided for the healthcare facility. The applicant's transport consultant has stated that there is nearby pay & display bays that disabled drivers are able to park for free and would be able to park on the single yellow line outside the healthcare facility for up to 3 hours. However, whilst this may be acceptable for visitors, provision should be made for staff of the healthcare facility and as such in line with the recommendation above the layout of the parking bays for the healthcare facility would need to also accommodate a disabled parking space. A condition is recommended to this affect.

6.10.13 The proposal will include the provision of 2 car club parking spaces within the wider Zone A site which can be used by residents. These spaces including membership will be secured through the s.106 agreement.

Cycle Parking

6.10.14 Long stay cycle parking would be provided in secure, covered stores within each core and would be fully accessible to all types of bicycles. All cycle parking would be at ground floor and accessed from the internal parking courtyard for each block. A total of 222 long stay parking spaces would be provided.

6.10.15 Short stay cycle parking would be provided as Sheffield stands in the public realm areas of the site.

6.10.16 TfL and the GLA's Stage 1 response state that the residential cycle parking should be revised in line with the draft London Plan standards. The quantum of long stay cycle parking proposed exceeds the current London Plan standards. Notwithstanding TfL's and GLA's comments, the Council's Highways Authority is satisfied with the quantum provided.

6.10.17 The applicant has not provided details for long stay parking for the proposed healthcare facility as the quantum of full time and part time staff is unknown at this stage. It is considered that secure long term cycle parking will need to be provided

within the footprint of the development. A condition is recommended that details of cycle parking for the healthcare facility is provided prior to damp proof course level to ensure that adequate cycle provision can be provided within the demise of the building.

Travel Plan

- 6.10.18 The applicant has submitted a framework travel plan in support of the residential element of the proposed development. This has been reviewed by the Council's Travel Planner and minor amendments were requested to the framework. The applicant's transport consultant has updated the framework travel plan accordingly. However, there is no reference to the health centre within this framework. The applicant has agreed that a separate framework travel for the health centre should be secured through the s.106 agreement alongside the monitoring and implementation of both the residential and healthcare facility travel plans. Accordingly, this is included under the heads of terms.

Deliveries and Servicing

- 6.10.19 With regards to refuse servicing, the refuse areas for blocks A and B would be from Rokeby Road. The management company will move the refuse bins from block C to the holding area which can be accessed directly from Rokeby Road. The distances and arrangement are considered to be acceptable. The applicant confirms that all servicing will be undertaken from Rokeby Road. Notwithstanding this, it is necessary to condition a detailed Delivery and Servicing Plan to ensure that there is appropriate on site management in place.
- 6.10.20 In conclusion, it is considered that the proposed development, subject to the imposition of appropriate conditions and/ or section 106 obligations would have no adverse impact up parking or highway safety and consequently would give rise to no conflict with the above stated policies.

6.11 Development and Flood Risk

- 6.11.1 London Plan Policy 5.12 *Flood Risk Management* states that development proposals must have regard to measures proposed in Catchment Flood Management Plans.
- 6.11.2 Core Strategy Policy CS1 U undertakes to manage development to achieve an overall reduction in flood risk and increased resilience to flood events. Policy AAP9 of the AAP calls for major development to: reduce surface water run-off; utilise sustainable drainage systems; ensure adequate arrangements for management and maintenance of on-site infrastructure; use appropriate measures to prevent water pollution; and where appropriate, demonstrate that the proposal would be resistant and resilient to flooding from all sources.
- 6.11.3 London Plan Policy 5.13 states that development should utilise sustainable urban drainage systems (SUDS) and should aim to achieve greenfield run-off rates and this objective is reiterated in Policy AAP9. Policy 5.13 of the London Plan sets out a drainage hierarchy to manage surface water run-off as close to its source as possible.

- 6.11.4 The applicant has submitted the 'Harrow View East Floor Risk Assessment and Drainage Strategy' Rev 2 – June 2015 (ref:658382-D-010, by CH2M Hill) which was approved under the outline permission P/2165/15. This report was prepared for the entire masterplan site and provides the overarching drainage strategy for the masterplan site. The reserved matters approved for the wider Zone A site was also prepared on the basis of this FRA.
- 6.11.5 The applicant has also submitted a surface water drainage strategy report for this revised scheme which assesses the impacts of future climate change and details the proposed mitigation measures.
- 6.11.6 The extant FRA approved under the outline permission has been reviewed by the Council's Drainage Authority and has found this to be satisfactory. However, detailed drainage design is required and has recommended that these details be conditioned.
- 6.11.7 The GLA in their stage 1 response have stated that the surface water drainage strategy does not comply with London Plan policy 5.13 and draft London Plan policy SI.13 as it does not give appropriate regard to the drainage hierarchy and greenfield runoff rate. They have stated that further details on how SuDS measures at the top of the drainage hierarchy will be included within the development and how greenfield runoff will be achieved should be provided. In addition, the proposed development does not meet the requirements of London Plan policy 5.15 and draft London Plan policy SI.5 as it does not meet the water consumption targets of these policies.
- 6.11.8 In response to the stage 1 comments, the applicant's drainage consultant has issued a further technical note setting out how the proposed development has been considered against the drainage hierarchy set out under London Plan policy 5.13 and draft London Plan policy SI.13. It is expected that comments in response to this additional technical note would be forthcoming under the stage 2 referral proposal.
- 6.11.9 In reference to the water consumption target set out under policy 5.15B of the London Plan, the technical note does not set out how it would meet the requirement to incorporate water saving measures and equipment, and that the design of the development would meet a target of 105 litres or less per head per day. However, it is considered that such matters can be secured by condition.
- 6.11.10 In conclusion, subject to the imposition of suitable conditions, the proposal would give rise to no conflict with the above stated policies.

6.12 Trees, Ecology and Biodiversity

- 6.12.1 The site is clear of any structures or trees and as such there are no existing ecological features on site.

- 6.12.2 The applicant has submitted a Biodiversity Protection & Enhancement Strategy in support of this current application. This strategy is the same as that was approved under the reserved matters application P/4610/17. The applicant's ecological consultant has confirmed in writing that as the strategy has already been approved, it is valid for the current application.
- 6.12.3 Whilst the Council's Biodiversity Officer has not formally commented on this current application, given that the comments made in respect of the approved reserved matter application mainly related to detailed aspects of the proposed enhancements and the same strategy has been submitted under this application, it is considered that the proposed ecological enhancement proposed, subject to the imposition of a similar condition to that attached to the reserved matters application, are considered to be acceptable.

6.13 Sustainability and Climate Change Mitigation

- 6.13.1 Policy 5.1 of The London Plan (2016) seeks to achieve an overall reduction in London's carbon dioxide emissions of 60 per cent by 2025. For 'major' developments (i.e. 10 or more dwellings), policy 5.2A/B of The London Plan sets out the 'lean, clean, green' approach to sustainability, which is expanded in London Plan policies 5.3A, 5.7B, 5.9B/C, 5.10C and 5.11A. The London Plan carbon dioxide reduction target for residential buildings during the period 2016-2019 is to achieve zero carbon. If zero carbon cannot be delivered on site, then any short would need to be offset through cash in lieu.
- 6.13.2 In respect of the non-domestic building, London Plan policy 5.2 requires development for the period of 2016-2019 to achieve as per what is required under building regulations.
- 6.13.3 Core Policy CS1.T and policy AAP4 of the AAP requires development proposals to incorporate sustainable building design and layout.

Energy Strategy

- 6.13.4 The energy Strategy prepared by PBA (dated 27 July 2018) broadly follows the requirements for such strategies outlined by the GLA and the London Plan / draft London Plan, including following the energy hierarchy. It proposes a total 35% on-site reduction in carbon emissions relative to Part L of the 2013 Building Regulations, with a carbon offset payment of £187,987 to offset the remaining 104.4 tonnes carbon to achieve zero carbon for the residential element of the development. The on-site reductions are 39.8% for residential and 17.3% for non-residential.
- 6.13.5 The strategy follows the energy hierarchy in that it proposes a 13.4% reduction through energy efficiency measures, comprising 12.9% for residential and 15% for non-residential (compared to the proposed target of 10% for residential and 15% for non-residential in the draft London Plan). These measures are supported although further detail and Part L calculation worksheets are required for this and other stages of the energy hierarchy.

- 6.13.6 The strategy then proposes a further 17.7% reduction through connection to the proposed on-site communal heating network serving the balance of Phase A; this network will derive its heat from a combination of CHP engine and an air source heat pump [which achieves significant reductions in carbon emissions (relative to CHP engines previously favoured by the GLA by increasingly more carbon intensive given the ongoing decarbonisation of the grid)]. The report correctly notes that the potential heat network serving Wealdstone would be unlikely to extend as far as the subject site and therefore connection to an existing or proposed district heat network is not possible. Even if development of that wider heat network was further progressed than currently (i.e. project agreed by the Council, fully funded and the three anchor heat loads being under construction as originally planned, but for which the timelines have slipped) and physical connection was possible with the subject site and in an appropriate timeframe, the techno-economic analysis undertaken by WSP indicated connection with the Harrow View East would not economically feasible.
- 6.13.7 Finally, a 3.9% reduction is achieved through the provision of on-site solar photovoltaic (PV) panels.
- 6.13.8 As noted above, the total on-site reductions are 39.8% for residential and 17.3% for non-residential. This leaves 104.4 tonnes of carbon emissions from residential development that needs to be offset to achieve zero carbon. This equates to circa £187,920 carbon offset contribution calculated at £1,800 per tonne. For the non-residential element, the applicant has not achieved the 35% reductions required on-site and provided limited justification for this. As a minimum, the applicant needs to demonstrate they have maximised carbon reductions on-site and should this be demonstrated, offset the emissions above the 35% target through a monetary contribution. Based on the figures in Table 11, the non-residential emissions target is 30.5 tonnes, but the scheme will achieve 38.8 tonnes achieved, resulting in 8.3 tonnes that needs to be offset representing a £14,940 monetary contribution. The total offsetting contribution is therefore £221,652.
- 6.13.9 The GLA Stage 1 response (dated 19 November 2018) whilst broadly supportive of the energy strategy and proposed outcomes, seeks additional information (including Part L calculations) and options / proposals for increasing the carbon reductions associated with respect to the non-residential elements. The applicant's responses to these from a LPA perspective are considered reasonable, including
- further commentary on potential connection to broader heat networks (see above);
 - overall on-site carbon emissions reductions being greater than required, so any modest shortfalls associated with the proposed health centre (where benchmark carbon figures have been used due to limited design detail at this stage as fit out will be undertaken by others) are more than compensated for elsewhere to achieve the overall 35% on-site reductions and would simply shift the mix of what remaining carbon emissions need be offset by a monetary contribution; and
 - rationale for utilising only two roofs for solar PV (i.e. visual amenity impacts of solar panels on the lower roofs).

6.13.10 More detailed comments not contained in the Mayor's response have been provided by the GLA to the applicant and the applicant is yet to respond to these. It is considered that the even more detailed information sought by the GLA in their technical comments can be addressed by requiring an updated energy strategy as a condition on any planning permission. The condition should make it clear the energy strategy must demonstrate how zero carbon will be achieved for the residential development and a 35% reduction achieved (relative to Part L 2013) for the non-residential element, and address the specific issues raised in the GLA's technical response.

6.13.11 The carbon offset contribution should be secured by way of a s106 obligation, with the following heads of terms:

- Upon completion of the development, submission of 'As Built' Part L worksheets demonstrating the carbon emissions reductions achieved for each stage of the energy hierarchy and the remaining carbon emissions;
- Calculation of the remaining carbon emissions that need to be offset to achieve zero carbon development for the residential element of the scheme and a 35% reduction (relative to Part L 2013) for the non-residential element; and
- Calculation of the carbon offset contribution using the formula: Carbon emissions to be offset (tonnes) x £1800 / tonne.

In conclusion, the development would accord with development plan policies. To ensure compliance with these standards, a condition is attached requiring a post occupation assessment of energy ratings, demonstrating compliance with the submitted energy report.

Sustainability

6.13.12 This application is accompanied with a supporting Sustainability statement which sets out the various sustainable benefits of the scheme which includes:

- Biodiversity and wildlife corridors
- Green amenity space and parks
- Sustainable drainage solutions and shading and shelter
- Blue green roof coverage
- Exclusive use of native planting and trees
- Sustainable transport options through restricted parking, easy access to bus stops, cycle storage, electric car charging points.

6.13.13 Overall, the scheme delivers a sustainable development in the Heart of Harrow that accommodates for significant residential density and employment opportunities plus all the associated facilities and infrastructure to create a resilient community.

Wind Microclimate

- 6.13.14 In view of the taller buildings on this site, the applicant has undertaken a wind microclimate desk study to support this application. The desk study undertaken provides a qualitative review of pedestrian level wind environment for the proposed development.
- 6.13.15 The pedestrian comfort is assessed on the 'Lawson comfort criteria' basis. The report identifies that the southern and western facades of the development have some potential to create down draughts, re-directing fast moving upper level winds towards the ground and first floor levels and likely to be accelerated around corners. Wind conditions in around the site are predominately expected to rate as suitable in terms of safety for the general public. However, mitigations in form of tree/ hedge planting or screens would help.
- 6.13.16 The report concludes that wind conditions in and around the proposed development are expected to be predominately suitable in terms of comfort and safety at pedestrian level. However, there is some risk that these criteria may be marginally exceeded in isolated places. The report identifies some additional measures that could further enhance conditions in certain localised spaces. Although it is noted that the areas of marginal exceedance relates to areas that would be thoroughfares and that through appropriate tree and shrub planting mitigation can be achieved. The main recreational areas where people are likely to spend a short time standing/ sitting are suitable in terms of comfort and safety. Overall, it is considered that the proposed development, subject to the suggested landscape mitigation would have an acceptable impact in terms of wind microclimate.

6.14 Land Contamination and Remediation

- 6.14.1 The NPPF requires LPAs to ensure that the site is suitable for the new uses proposed, taking account of ground conditions including pollution arising from previous uses. Adequate site investigation information, prepared by a competent person, should be presented. In the absence of a specific policy within the Harrow and Wealdstone AAP, this reflects the requirements of policy DM15 of the DMP, which also requires an investigation of the hazards posed and appropriate.

The application is accompanied by a Ground Conditions Assessment, which summarises the extent of the land contamination on the site that has arisen from over a century of industrial activities. This assessment dates back to December 2016. Since the publication of this ground assessment report, the applicant has already discharged details pursuant to condition 27 attached to the outline permission P/2165/15, which required a) site investigations scheme; b) the results of the site investigation and remediation strategy and c) a verification plan setting out the data that will be collected in order to demonstrate that the works sets out in the remediation strategy are complete and identifying any requirement for any long term monitoring of pollutant leakages, maintenance and arrangements for contingency action. The details pursuant to this condition were approved under applications P/1125/17 and P/2985/18. As the details approved related to the

entire Zone A site, which included Plot A3, it is considered that there is no further requirement for land contamination assessment to be secured by condition. It is considered that Condition 31 relating to verification report and Condition 36 relating to piling attached to the original outline permission P/2165/15, should be carried forward to this application for completeness given that this is a standalone application.

6.15 Air Quality

- 6.15.1 Policy 7.14B of the London Plan seeks to minimise exposure to existing poor air quality and make provision to address local problem of air quality. It goes onto stated *inter alia* measures to reduce emissions during demolition and construction; proposals to be 'air quality neutral' and not to lead to further deterioration in air quality; ensure on-site provision of measures to reduce emissions; and assessment of the air quality implications of biomass boilers. Policy DM1 (D.h) of the DMP also reinforces the view of assessing the impact of proposal on *inter alia* vibration, duct and air quality.
- 6.15.2 This application is supported with an Air Quality Assessment (AQR) which assesses the impact of the proposed development both during construction period and operational period on the air quality in the surrounding area. The impact of the Energy Centre located on Plot D8 has also been assessed.
- 6.15.3 Harrow is within an 'Air Quality Management Area (AQMA) due to the exceedance of the annual and hourly mean Nitrogen Dioxide and the 24 hours mean small airborne particles.
- 6.15.4 The AQR concludes that construction works have the potential to create dust and as such during such period it recommends that a package of mitigation measures is put in place to minimise the medium risk of elevated small particles concentrations and dust nuisance in the surrounding area. With sufficient mitigation in place, the construction impacts are judged as being not significant.
- 6.15.5 The development is predicted to have an insignificant effect on local air quality. Although no mitigation is required against the traffic generated by the proposed development, the applicant is committed to reduce vehicle movements associated with the development through the incorporation of a travel plan. Transport emissions associated with the proposed development are considered to comply with the air quality neutral requirements, and therefore no further mitigation is required in this regard. Emissions from the proposed Energy Centre on Plot D8 are predicted to have an insignificant effect on the local air quality and the proposed development.
- 6.15.7 Overall, there are no air quality constraints arising from the proposed development.

6.15.8 Whilst the Council's Environmental Health Team have not commented in respect of this application, it is considered that the mitigations suggested in the AQR in respect of the construction phase would be adequately captured with the Construction Logistics condition. Subject to the imposition of the recommended condition, the proposed development would give rise to no conflict with the above stated policies.

6.16 Environmental Impact Assessment

6.16.1 The application has been screened under the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (as amended) and whilst the development would not in isolation exceed the applicable threshold, it is considered that the development does not constitute Environmental Impact Assessment (EIA) Development. However, the wider masterplan was supported with a full Environmental Statement and supplemental to this a number of conditions have been imposed under the outline permission to mitigate the impacts of the entire masterplan site on the wider environment. The uplift in the number of flats on this site would not have any discernible impact upon the mitigations that have already been secured.

6.17 Statement of Community Engagement

6.17.1 The NPPF, Localism Act and the Council's Statement of Community Involvement encourage developers, in the case of major applications such as this, to undertake public consultation exercise prior to submission of a formal application.

6.17.2 Prior to the submission of this application, the applicant did hold a Public Information Event. The applicant had sent out leaflets of invitation to local residents that residing close to the site. Invitation emails were sent to local stakeholders, ward councillors, planning committee members, LBH's Cabinet Member for Planning and Development.

6.17.3 The Council also sent out letters of consultation to local residents in the surrounding area inviting them to make representations on the proposed development.

6.17.4 The applicant has sought to encourage public consultation in respect the proposal in line with the guidance set out in the NPPF and the Localism Act.

6.18 S.106 Obligations and Infrastructure

6.18.1 The heads of terms of the section 106 agreement have been set out above. These are considered necessary to make the application acceptable, in accordance with policy 3.2 of The London Plan 2016 and policies CS1.Z/AA and CS2.Q of the Harrow Core Strategy 2012.

7.0 CONCLUSION AND REASONS FOR APPROVAL

- 7.1 The redevelopment of the site would enhance the urban environment in terms of material presence, attractive streetscape, and good routes, access and makes a positive contribution to the local area, in terms of quality and character and delivering the necessary social infrastructure in form of a new healthcare facility to support the wider masterplan and community. The massing and scale proposed would appropriately relate to the wider masterplan site and would permit full optimisation of this previously developed land to bring forward much needed housing which would positively add to the Council's housing delivery targets.
- 7.2 The proposal would secure the provision of affordable housing (which is to be provided on the wider masterplan site owned by the applicant) at a level that meets the minimum affordable housing target set out in the development plan.
- 7.3 The layout and orientation of the buildings and separation distance to neighbouring properties is considered to be satisfactory to protect the amenities of the neighbouring occupiers and the development would contribute towards the strategic objectives of reducing the carbon emissions of the borough.
- 7.4 The decision to grant planning permission has been taken having regard to the National Planning Policy Framework (2018), the policies of The London Plan (2016), Harrow's Core Strategy (2012), the policies of the Harrow and Wealdstone Area Action Plan (2013) and the policies of the Harrow Development Management Policies Local Plan (2013), as well as to all relevant material considerations including the responses to consultation.

APPENDIX 1: Conditions and Informatives

Conditions

1	<p>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.</p>
2	<p>Unless otherwise agreed in writing by the local planning authority, the development shall be carried out in accordance with the approved drawings and documents listed below: TBC REASON: To ensure that the development is carried out to the highest standards of architecture and materials.</p>
3	<p>No development shall take place until a construction management and logistics strategy, to include details of cranes and other tall construction equipment (including obstacle lighting) has been submitted to, and agreed in writing by, the local planning authority. The plan shall detail the arrangements for:</p> <ul style="list-style-type: none">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; andf) a scheme for recycling/disposing of waste resulting from construction works.g) measures for the control and reduction of dusth) measures for the control and reduction of noise and vibration. <p>The construction of the development shall be carried out in accordance with the strategy so agreed.</p> <p>REASON: To ensure that construction work and construction equipment associated with the development does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter and receiver systems. To ensure that measures are agreed and in place to avoid any obstruction to air traffic and to safeguard the integrity of air traffic operational systems during the demolition and construction phases of the development, this condition is a PRE-COMMENCEMENT condition.</p>

4	<p>No development shall take place until details of works for the disposal of surface water, including surface water attenuation and storage, have been submitted to, and agreed in writing by, the local planning authority. The submitted details shall include measures to prevent water pollution and details of SuDS and their management and maintenance. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.</p> <p>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. To ensure that measures are agreed and built-in to the development to manage and reduce surface water run-off, this condition is a PRE-COMMENCEMENT condition.</p>
5	<p>No development shall take place until a foul water drainage strategy, has been submitted to and agreed in writing by the local planning authority. The development shall not be occupied until the agreed drainage strategy has been implemented.</p> <p>REASON: To ensure that there would be adequate infrastructure in place for the disposal of foul water arising from the development, and to ensure that the development would be resistant and resilient to foul water flooding. To ensure that measures are agreed and put in place to dispose of foul water arising from the development, this condition is a PRE-COMMENCEMENT condition.</p>
6	<p>No site works or development shall commence until details of the levels of the building(s), road(s) and footpath(s) in relation to the adjoining land and highway(s), and any other changes proposed in the level of the site, have been submitted to, and agreed in writing by the local planning authority. The development shall be carried out in accordance with the details so agreed.</p> <p>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. This is a PRE-COMMENCEMENT condition.</p>
7	<p>The development hereby approved shall not commence until an updated Energy Strategy has been submitted to, and agreed in writing by, the local planning authority. The energy strategy must demonstrate how zero carbon will be achieved for the residential development and a 35% reduction achieved (relative to Part L 2013) for the healthcare facility. Details should include SAP TER/ DER worksheets, BRUKL worksheet for the building including energy efficiencies and should deal with any outstanding matters outlined in</p>

	<p>the GLA's formal Stage 1 technical response dated 8.01.2019. The development shall be carried out in accordance with the strategy as so agreed and shall be retained as such thereafter.</p> <p>REASON: To ensure the delivery of a sustainable development. This is a PRE-COMMENCEMENT condition.</p>
8	<p>Notwithstanding the details shown on the approved drawings, the development hereby approved 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, and agreed in writing by, the local planning authority:</p> <ul style="list-style-type: none"> a) facing materials for the building, including brickwork bond details; b) windows/ doors, including those to all servicing areas; c) balcony screens including balustrade detail, privacy screens and soffits; d) boundary treatment including all pedestrian/ access gates; e) ground surfacing; and f) raised planters. <p>The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.</p> <p>REASON: To safeguard the appearance of the locality and to ensure a satisfactory form of development.</p>
9	<p>The development hereby approved shall not progress beyond damp proof course level until a x 1:1 sample mock-up of a window opening with surrounding brickwork and a window opening proposed with the special glazed brick details to be used in the external faces of the buildings have been erected on site (or at such other location(s) as may be agreed in writing by the local planning authority) and agreed in writing by, the local planning authority. The development shall be carried out in accordance with the details, samples and drawings so agreed and shall be retained as such thereafter.</p> <p>REASON: To ensure that the development is carried out to the highest standards of architecture and materials.</p>
10	<p>The development hereby approved shall not progress beyond basement level until the following details have been submitted to, and agreed in writing by, the local planning authority:</p> <ul style="list-style-type: none"> 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 and proposed numbers / densities and an implementation programme. The hard surfacing details shall include samples to show the texture and colour of the materials to be used and information about their sourcing/manufacturer. The hard and soft landscaping details shall demonstrate how they would contribute to privacy between the approved private terraces and the public pedestrian route, and communal podium garden/open space areas. Details shall also include revised locations of the proposed street trees along Rokeby Road to ensure clear visibility splay from the car park entrance;

- b) Details of all furniture, boundary treatment, play equipment, irrigation if proposed; details of the vent grilles to all communal areas including any vent screening and details of any signage to the public realm;
- c) A specification of all play equipment to be installed including provision for children with disabilities and special sensory needs; a specification of the surface treatment within the play areas; and arrangements for ensuring the safety and security of children using the play areas;
- d) hard and soft landscape details and planting plans for the green/ blue roofs which shall include written specification of the planting and the biodiverse roof detail make build-up of the layers, including the substrate and schedules of plants, noting species, plant sizes or types (all at time of planting) proposed numbers / densities and details of the maintenance including irrigation; and
- e) proposals for increasing the availability of bird nesting places and bat roosts within the site (including detailed specification and locations of boxes and in-built features) together with details of their ongoing maintenance/ monitoring and any necessary replacement.

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.

11	<p>The development hereby approved in relation to criterion a) and b) shall not progress beyond damp proof course level until details noted below have been submitted to and approved in writing by the local planning authority:</p> <ul style="list-style-type: none"> a) full details (including specification) of any extraction flues, plant/ ventilation systems, rainwater disposal systems (including downpipes) and any rollershutters, gates and other means of controlling access to the car park; b) details to demonstrate that all plant/ ventilation systems would meet the plant noise criteria set out in the submitted Noise and Vibration Impact Assessment (Ref:39048/3003); and c) a follow up acoustic survey to demonstrate installed plant compliance shall be submitted within six months of the first occupation of the development. <p>The application shall be implemented in full accordance with such details and be maintained thereafter.</p> <p>REASON: To ensure that potential adverse noise impacts to residential premises within the development are mitigated.</p>
12	<p>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.</p> <p>REASON: To ensure that the development makes efficient use of mains water.</p>
13	<p>The development hereby approved shall not progress beyond damp proof course level until details of the lighting (full specification, elevations and location) of all public realm and other external areas (including buildings and the podium car park) within the site has been submitted to, and agreed in writing by, the local planning authority. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.</p> <p>REASON: To ensure that the development incorporates lighting that contributes to Secured by Design principles and achieves a high standard of residential quality.</p>

14	<p>The development hereby approved shall not progress beyond damp proof course level until details of a strategy for the provision of communal facilities for television reception (eg. aerials, dishes and other such equipment) have been 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 development 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.</p> <p>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 and to ensure that the development achieves a high standard of amenity for future occupiers the buildings.</p>
15	<p>The development hereby approved shall not progress beyond damp proof course level until revised details have been submitted to, and approved in writing by, the local planning authority showing the provision of the correct number and appropriate size of bins for Cores A and C, and details (floor plans/ elevations) showing a separate provision, including the correct number of bins, for the proposed healthcare facility. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.</p> <p>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.</p> <p>REASON: To ensure that the development provides adequate refuse facility to serve the development and achieves a high standard of residential.</p>

16	<p>The development hereby approved shall not be first occupied until a verification report demonstrating completion of the works set out in the approved remediation strategy for that phase and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a 'long-term monitoring and maintenance plan') for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the local planning authority. The long-term monitoring and maintenance plan shall be implemented as approved.</p> <p>A verification report is only required to be submitted and approved once per phase.</p> <p>REASON : To protect groundwater and future end users of the site,</p>
17	<p>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:</p> <ul style="list-style-type: none"> a) details of how the parking spaces would be managed and allocated, including any enforcement procedure for any unauthorised parking on the site and assurance from the developer/owner that it shall fund the installation of the passive electric charging points as set out under sub-section b) below as and when required; b) identify the electric vehicle charging point spaces that are to be provided within the podium car park as 'active' spaces' and those as 'passive' spaces', which shall include 20% fully active provision and remaining 80% to have passive provision; c) provision of active electric charge points for the operational parking associated with the Health Centre; d) details of the relevant disabled person's parking spaces within the basement car park (for residents) and make provision for at least one disabled person's space for the Health Centre ; e) details of the provision of cycle parking for residential and Health Centre, including visitors to the development, which shall include the type of cycle stands proposed (including specification) and location of the secure cycle store for the Health Centre which shall be sufficient in size to meet the requirement of the London Plan cycle standards for such use;

	<p>f) space for parking motorbikes/scooters at a ratio of 1 such space for every 20 car parking spaces; and</p> <p>g) detail of a servicing and delivery management plan.</p> <p>The development shall be carried out in accordance with the plan so agreed and shall be retained as such thereafter.</p> <p>REASON: To ensure that the development provides sufficient disabled parking, cycle, motorcycle and electric vehicle charging points.</p>
18	<p>The development hereby approved shall not be first occupied until a scheme for the on-going management, management programme of works and maintenance of all the hard and soft landscaping within the development, to include a Landscape Management Plan, including long term design objectives, management responsibilities and maintenance schedules to include details of the arrangement for the implementation for all landscape areas (including communal residential areas), other than small, privately owned, domestic gardens, shall be submitted to, and approved in writing by, the local planning authority. Details shall also include schedule of landscape maintenance for year 1, years 2-5 and on-going maintenance from year 6 onwards. The Landscape Management Plan shall be carried out in a timely manner as approved.</p> <p>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 and to ensure a high standard of design, layout and amenity.</p>
19	<p>Prior to the first occupation of the development, the applicant shall apply for a Secured by Design Certification which shall be submitted and approved in writing by the local planning authority, 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.</p> <p>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.</p>

20	<p>The residential premises hereby approved shall not be occupied until: (i) an audio-visual access control system has been installed; or (ii) such alternative security measures have been installed that shall first have been submitted to, and agreed in writing by, the local planning authority.</p> <p>REASON: To ensure that the development achieves a high standard of residential quality for future occupiers of the development.</p>
21	<p>Prior to the first occupation of the residential units, details of the arrangements for the distribution of mail (including any mail boxes) and other deliveries to residents within the development shall be first submitted to, and agreed in writing by, the local planning authority. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.</p> <p>REASON: To ensure that the development contributes to the achievement of a lifetime neighbourhood and a high standard of design and layout.</p>
22	<p>The development hereby approved shall not be occupied until the measures for the acoustic insulation and ventilation of the flats detailed in the Noise and Vibration Impact Assessment (Ref:39048/3003) submitted with the application have been implemented in full.</p> <p>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.</p>
23	<p>Within 3 months (or other such period agreed in writing by the local planning authority) of the final completion of the development a post construction assessment shall be undertaken demonstrating compliance with the approved Energy Statement; which thereafter shall be submitted to the local planning authority for written approval.</p> <p>REASON: To ensure the delivery of a sustainable development.</p>
24	<p>Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.</p> <p>REASON : To protect groundwater and future end users of the site.</p>

25	<p>Notwithstanding the provisions of Part 16 (Communications) to Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015, or any order revoking and replacing that Order with or without modification, no development that would otherwise be permitted by that part of the Order (or the equivalent provisions of any replacement Order) shall be carried out without planning permission having first been obtained by the local planning authority.</p> <p>REASON: To ensure that the development preserves the highest standards of architecture and materials.</p>
26	<p>The residential units hereby approved shall each be provided with storage space in accordance with standard set out under Table 3.3 (Minimum Space Standards for new dwellings) appended to policy 3.5C of the London Plan (2016) unless otherwise agreed in writing by the local planning authority.</p> <p>REASON: To ensure that the development achieves a high standard of residential quality for future occupiers of the development</p>
27	<p>The development hereby permitted shall be constructed to include 90 per cent of the new homes to meet Building Regulations requirement Part M M4(2) 'accessible and adaptable dwellings' with the remaining 10 per cent meeting Building Regulations requirement Part M M4(3) 'wheelchair user dwellings' and thereafter retained in that form.</p> <p>REASON: To ensure that the development is capable of meeting 'Accessible and Adaptable Dwellings' standards in accordance with policies 3.5 and 3.8 of The London Plan (2016), policy CS1.K of The Harrow Core Strategy (2012) and policies DM1 and DM2 of the Development Management Policies Local Plan (2013).</p>
28	<p>The health care facility shall only be used for the purposes as set out in the application and for no other purpose, including any other purposes in Class D1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (or in any provision equivalent to that Class in any Statutory Instrument revoking and re-enacting that order with or without modification).</p> <p>REASON: To ensure the delivery of vital social infrastructure to serve the wider community and built a resilient community, to safeguard the amenity of neighboring residents and the character of the locality and in the interests of highway safety.</p>

29	<p>Unless otherwise agreed in writing by the local planning authority, the health care facility hereby approved shall only be open to the public between: 7am and 11pm on Mondays to Saturdays; and 8.30 am and 10.30pm on Sundays and Bank Holidays.</p> <p>REASON: To ensure that the operation of the ground floor uses is compatible with residential amenity.</p>
30	<p>Deliveries to any non-residential uses within the development shall take place only between the hours of 6.30am and 11pm on Mondays to Saturdays and between the hours of 8.30am and 10pm on Sundays and Bank Holidays, unless otherwise agreed in writing by the local planning authority.</p> <p>REASON: To ensure that the noise impact of deliveries associated with non-residential uses within the development is minimised and that the development achieves a high standard of amenity for future and the neighbouring occupiers.</p>

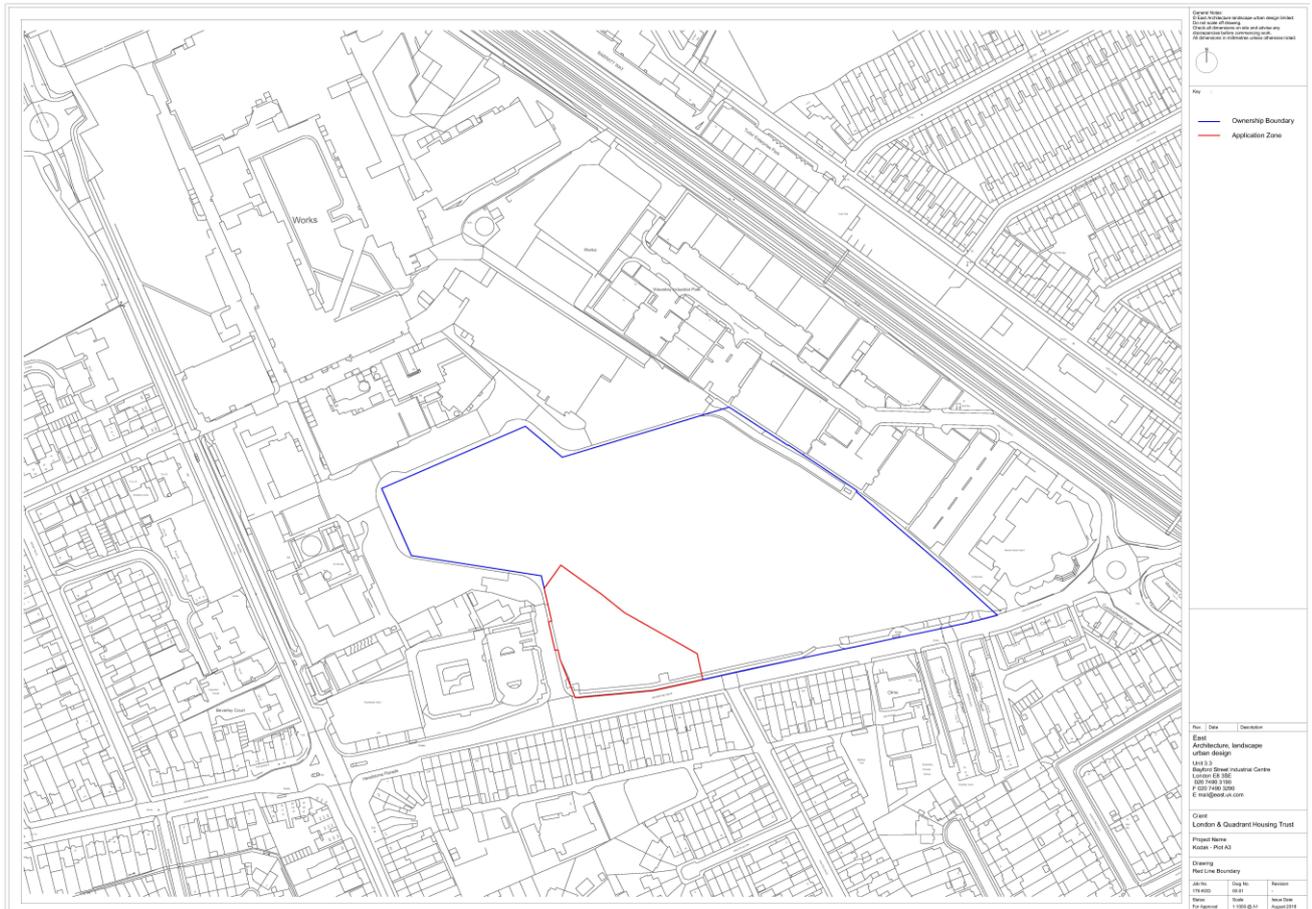
Informatives

1	<p>INFORMATIVE: The following policies are relevant to this decision:</p> <p>National Planning Policy Framework (2018)</p> <p>The London Plan (2016) Policies 2.13, 3.3, 3.4, 3.5, 3.6, 3.8, 3.11, 3.12, 5.1, 5.2, 5.3, 5.7, 5.11, 5.12, 5.13, 5.18, 5.21, 6.3, 6.9, 6.13, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.7, 7.8, 7.13, 7.14, 7.15, 7.18, 8.2.</p> <p>The Draft London Plan (2017) Policies: D1, D2, D3, D4, D5, D6, D7, D13, H1, H5, H7, G6, G7, SI3, S15, SI12, SI13, T5, T6, T6.1</p> <p>The Harrow Core Strategy (2012) Core Policies CS1</p> <p>Harrow and Wealdstone Area Action Plan (2013) Policies: AAP1, AAP3, AAP5, AAP7, AAP9, AAP11, AAP13, AAP19, AAP20</p> <p>Development Management Policies Local Plan (2013) Policies DM1, DM2, DM3, DM9, DM10, DM12, DM14, DM15, DM20, DM21, DM22, DM24, DM27, DM28, DM42, DM44, DM45, D,46, DM50</p> <p>Supplementary Planning Document - Residential Design Guide (2010) Code of Practice for Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (2008). Mayors Housing Supplementary Planning Guidance (2016) Mayors Affordable Housing and Viability Supplementary Planning Guidance (2017)</p>
2	<p>INFORMATIVE: The applicant's attention is drawn to the requirements in the Considerate Contractor Code of Practice. In the interests of minimising any adverse effects arising from building operations, the limitations on hours of working are as follows: 0800-1800 hours Monday - Friday (not including Bank Holidays) 0800-1300 hours Saturday</p>

3	<p>INFORMATIVE:</p> <p>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:</p> <ol style="list-style-type: none"> 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, <p>and that work falls within the scope of the Act.</p> <p>Procedures under this Act are quite separate from the need for planning permission or building regulations approval.</p> <p>"The Party Wall etc. Act 1996: explanatory booklet" is available free of charge from:</p> <p>Communities and Local Government Publications, PO Box 236, Wetherby, LS23 7NB</p> <p>Please quote Product code: 02 BR 00862 when ordering.</p> <p>Also available for download from the Portal website: https://www.gov.uk/party-wall-etc-act-1996-guidance</p>
4	<p>INFORMATIVE:</p> <p>IMPORTANT: Compliance With Planning Conditions Requiring Submission and Approval of Details Before Development Commences</p> <ul style="list-style-type: none"> - 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.
5	<p>INFORMATIVE:</p> <p>The applicant is advised that any window in the flank elevation of the development hereby permitted will not prejudice the future outcome of any application which may be submitted in respect of the adjoining property.</p>
6	<p>INFORMATIVE:</p> <p>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 TBC of Community Infrastructure Levy. This charge has been levied under Greater London Authority CIL charging schedule and s211 of the Planning Act 2008.</p> <p>Harrow Council as CIL collecting authority on commencement of development will be collecting the Mayoral Community Infrastructure</p>

	<p>Levy (CIL). Your proposal is subject to a CIL Liability Notice indicating a levy of TBC for the application, based on the levy rate for Harrow of £35/sqm and the stated increase in floorspace of TBC.</p> <p>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</p>
7	<p>INFORMATIVE: 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 TBC</p>
8	<p>INFORMATIVE: Notwithstanding the note on your submitted plan(s), this decision has been made on the basis of measurements scaled from the plan(s), unless a dimensioned measurement overrides it.</p>
9	<p>INFORMATIVE: The applicant is advised to engage with the Designing Out Crime Officer at an early stage of the detailed design stage in respect of meeting the requirement of condition 18.</p>
10	<p>INFORMATIVE: The applicant is advised a Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Thames Water would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality .</p>

APPENDIX 2: SITE PLAN



Site location plan

APPENDIX 3: PLANS AND ELEVATIONS



Proposed ground floor plan.



Proposed first floor plan



Proposed Rokeby Road elevation

APPENDIX 4: Greater London Authority Report and follow up Email responses

Harrow View East, Plot A3

in the London Borough of Harrow

planning application no. P/3671/18

<p>Strategic planning application stage 1 referral</p> <p>Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.</p>
<p>The proposal</p> <p>Construction of six to fourteen storey building to create Health care facility (Class D1) and 127 flats; parking; refuse and cycle storage; associated landscaping.</p>
<p>The applicant</p> <p>The applicant is L&Q, and the architect is East.</p>
<p>Strategic issues</p> <p>Principle of development: The optimisation of land and contribution towards increased housing delivery and social infrastructure is strongly supported in line with the London Plan, draft London Plan and Harrow and Wealdstone AAP (paragraphs 19-22).</p> <p>Affordable housing: The application for this plot proposes 43.6% affordable housing by habitable room (65:35 split in favour of affordable rent), which would increase the overall level of affordable housing across development Zone A from 21.5% to 25%. Following the findings of the independent viability review, the maximum level of affordable housing must be provided. Early and late stage review mechanisms must also be secured in accordance with the draft London Plan (paragraphs 27-33).</p> <p>Urban Design: The height, massing and architecture is supported, however further consideration is required in terms of the public realm along Headstone Drive and how this interacts with the frontage of the health care facility (paragraphs 35-47).</p> <p>Further information is sought with respect to energy (paragraphs 50-52), flood risk & drainage (53-55) and transport (56-61).</p>
<p>Recommendation</p> <p>That Harrow Council be advised that whilst the scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan for the reasons set out in paragraph 68 of this report. The resolution of those issues could, nevertheless, lead to the application becoming compliant with the London Plan.</p>

Context

1 On 11 October 2018 the Mayor of London received documents from Harrow Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following category of the Schedule to the Order 2008:

- 1C (1c) "Development which comprises or includes the erection of a building... more than 30 metres high and is outside the City of London";

3 Once Harrow Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 This application relates to Plot A3 of the wider Kodak factory outline masterplan (planning ref: P/3405/11), also referred to as Harrow View East.

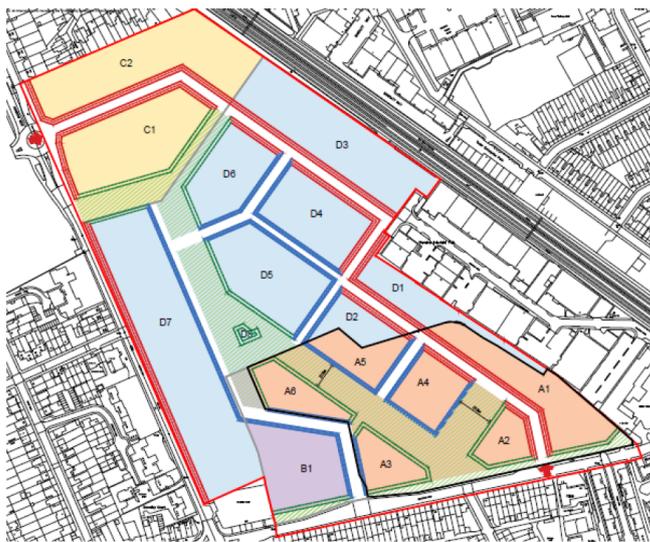


Image 1: Extent of Kodak Masterplan site, including development Zones

6 The Kodak factory site is located to the west of Wealdstone district town centre and falls within the Harrow and Wealdstone Opportunity Area as identified by the London Plan and draft London Plan. The site also forms part of the Harrow Housing Zone, the boundary of which corresponds with that of the Opportunity Area.

7 The Kodak factory site lies to the east of Harrow View and is a roughly triangular plot of approximately 16 hectares – bound by suburban residential hinterland to the north, the Waverly Industrial Estate and railway line to the east, Headstone Drive to the south, and Harrow View to the west. The application site (Plot A3) is a 0.48 hectare irregularly shaped plot, which is located at the south-western end of the Kodak factory site (Zone A) and fronts on to Headstone Drive.

8 At its southern point, the application site lies 500 metres from Harrow and Wealdstone station (which offers national rail, London Underground Bakerloo Line and London Overground services). Three bus routes (H9, H10 and H14) run adjacent to the site, although a further six routes can be accessed at Harrow and Wealdstone station. Further bus services run along Station Road, (350 metres to the south). There are no sections of the Transport for London Road Network in close proximity to the site, however, Station Road forms part of the Strategic Road Network. The public transport accessibility level of the site ranges from two to four (on a scale of one to six – where six denotes the most accessible locations in the capital).

Details of the proposal

9 The application site benefits from reserved matters approval (ref: P/5432/16) for the provision of 30 residential units and 5,086 sq.m. of floorspace allocated to provide assisted living accommodation.

10 The current proposal seeks full planning permission to redevelop the site to provide 127 residential units and a 1,386 sq.m. health care facility (Class D1) at ground and first floor, within three linked blocks, ranging in height from six to 14 storeys.

11 Whilst a health care facility was originally approved for the ground floor of Plot A5 (ref: P/3405/11), the NHS Harrow Clinical Commissioning Group confirmed that they require a significantly larger healthcare facility than that currently permitted on Plot A5. Accordingly, given the lack of an operator for the proposed care home and its more prominent position on Headstone Drive, it is proposed to relocate the healthcare facility to the application site.

Case history

12 Following consultation with the Mayor (refer to GLA report D&P/2830/02), Harrow Council approved planning permission for the Kodak outline masterplan (P/3405/11) in December 2012. The masterplan included two parcels of land: Harrow View East (the Kodak factory site); and, Harrow View West (the adjacent former Kodak sports ground). In accordance with the approach established within the Harrow and Wealdstone AAP, significant consolidation of the Wealdstone Strategic Industrial Location was accepted in order to enable delivery of a wide range of regenerative benefits as part of a comprehensive mixed use development.

13 The Harrow View West site has been sold by the applicant and is being developed independently by Persimmon Homes.

14 Reserved matters application (reference: P/4610/17) for Zone A addressing all matters for Plots A1, A2, A3(a), A4, A5, the Green Link and Central Green was approved on 15 December 2017. The proposals for the Reserved Matters approval comprised 650 dwellings of which 21.5% were affordable, five flexible use units within Classes A1-A5, a food store, a health

care centre and an energy centre. The proposals also included details for a care home which would be situated on Plot A3.

15 On 10 May 2018 GLA officers held a pre-planning application meeting at City Hall to discuss this revised scheme for Plot A3 of the Harrow View East (Kodak factory) site. The advice issued by GLA officers stated that the proposed residential-led intensification of Plot A3 was supported in terms of the uplift in housing delivery and provision of a health facility. Notwithstanding this, the applicant was advised to ensure that the future planning submission addressed a number of issues with respect to: affordable housing; urban and inclusive design; children's play space; sustainable development / climate change mitigation; and, transport.

Strategic planning issues and relevant policies and guidance

16 The relevant issues and corresponding policies are as follows:

- Opportunity Area *London Plan;*
- Social infrastructure *London Plan;*
- Housing *London Plan; Housing SPG; draft Interim Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;*
- Affordable housing *London Plan; Housing SPG; draft Interim Housing SPG; Housing Strategy;*
- Density *London Plan; Housing SPG; draft Interim Housing SPG;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;*
- Transport and parking *London Plan; the Mayor's Transport Strategy;*

17 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2012 Harrow Core Strategy and Harrow Proposals Map (as updated); 2013 Harrow and Wealdstone Area Action Plan; 2013 Development Management Policies Local Plan; and, the London Plan (consolidated with alterations since 2011).

18 The following are also relevant material considerations:

- The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance; and,
- Draft London Plan (consultation draft, December 2017 incorporated early suggested changes published August 2018)
- In August 2017 the Mayor published his Affordable Housing and Viability SPG. This must now be read subject to the decision in R (McCarthy and Stone) v. Mayor of London, in which the High Court granted a declaration that references in the SPG to late stage review were unlawful, to the extent that late stage review is recommended in all cases, irrespective of the time which its is likely to be taken before a scheme is built out.

Principle of development

19 The site is located within Wealdstone District Centre, which forms part of the Harrow & Wealdstone Opportunity Area. Both the London Plan and draft London Plan emphasise the importance of Opportunity Areas in achieving London's growth through their capacity to accommodate large scale developments that provide jobs, housing and enhance placemaking. The Harrow & Wealdstone Opportunity Area is identified in the London Plan and draft London Plan as having an indicative capacity for a minimum of 2,800 new jobs and 5,000 new homes. Locally, the Harrow & Wealdstone Area Action Plan (HWAAP) identifies the Kodak site as one of the key sites for delivering 1,410 new homes in the Wealdstone West sub area. The site is also located within the Harrow Housing Zone.

20 Additionally, the London Plan and draft London Plan both identify the optimisation of land as a key part of the strategy for delivering additional homes in London; and draft London Plan Policy S2 encourages the co-location of health and social services with housing, to achieve a more efficient land use.

21 The proposed development would deliver 127 new homes (which represents an uplift of 96 units on the consented reserved matters scheme) and a health care facility. The proposed development is therefore supported in strategic planning terms, given its optimisation of land and contribution towards housing delivery in line with the London Plan Policy 3.3 and draft London Plan Policies GG2 and H1.

22 Whilst it is noted that a health centre was originally secured within Plot A5 (P/4610/17), the proposal would deliver a significantly larger healthcare facility, with a total GIA of 1,386 sq.m. This is strongly supported given the intensification of residential development previously approved for the Kodak Masterplan and the further uplift proposed in this application. The health care facility would also have a more prominent position on Headstone Drive and would be easily accessible by public transport, cycling and walking. The scheme therefore appropriately contributes towards social infrastructure in accordance with London Plan Policy 3.7 and draft London Plan Policy S2 'Health and social care facilities'.

Housing

23 London Plan Policy 3.3, in seeking to increase the supply of housing in London, sets borough housing targets. Table 3.1 sets a minimum annual monitoring target for the London Borough of Harrow at 593 additional homes per year between 2015 and 2025. The draft London Plan sets a higher annual target of 1,392 per year for the period 2019 to 2028. The scheme would deliver 127 new homes, which would contribute towards this target and is strongly supported.

24 The application proposes 127 residential units (market sale) within Plot A3. The unit mix is summarised as followed:

	Market Sale (Plot A3)
Studio	2 (2%)
1 bedroom	42 (33%)
2 bedroom	66 (52%)
3 bedroom	17 (13%)
Total	127

Table 1: proposed market housing mix

25 In addition to the 147 market sale units, the proposal seeks to replace 49 approved market sale units within Zone A, with affordable tenures. The tenure and plot location is summarised as followed:

	Affordable Rent (Plot A5)	Intermediate (Plot A1c & A4)	Total
1 bedroom	2	6	8
2 bedroom	16	8	24
3 bedroom	14	3	17
Total	32	17	49

Table 2: Provision of affordable housing

26 London Plan Policy 3.8, together with the Mayor’s Housing SPG, seek to promote housing choice and a balanced mix of unit sizes in new developments, whilst draft London Plan Policy H12 advises against setting prescriptive dwelling size mix requirements for market and intermediate homes. As demonstrated in Table 1, of the 147 new market sale homes, 87% (110 units) are studio, one or two-bedroom units and 17% of units would be able to accommodate larger families. Whilst the applicant should seek to maximise the provision of family-sized units, it is acknowledged that the unit mix will be driven by market conditions. Notwithstanding this, in accordance with the principles of London Plan Policy 3.11, the provision of family sized affordable housing should be prioritised. The unit mix for the affordable rented homes should be agreed with the Council to reflect local needs and shall be secured by way of planning condition / obligation as appropriate.

Affordable housing

27 London Plan Policy 3.12 seeks the maximum reasonable amount of affordable housing. Policy H5 of the draft London Plan sets a strategic target of 50%. Policy H6 of the draft London Plan and the Mayor’s Affordable Housing and Viability SPG set out a ‘threshold approach’ whereby schemes, not on public land, meeting or exceeding a specific threshold of 35% affordable housing by habitable room without public subsidy and which meet other criteria are not required to submit viability information to the GLA, nor would the application be subject to a late stage review mechanism. This is referred to as the Fast Track Route.

28 The scheme would deliver 49 affordable units within development zones A1C, A4 & A5. Based on the 127 units proposed for Plot A3, this equates to 43.6% affordable housing by habitable room, which would increase the overall level of affordable housing across development Zone A from 21.5% to 25%. As discussed, the affordable homes would be provided on Plots A1(c), A4 and A5, rather than Plot A3 itself. This allows the applicant to consolidate the locations of affordable housing across Zone A to facilitate the management of the units by the registered provider (L&Q). Whilst this approach is supported and the increase in affordable homes is welcomed, given the overall level of affordable housing across the masterplan the development does not qualify for the Fast Track Route.

	Reserved Matters approval (P/4601/17)	Proposed application	Uplift
Affordable Rent	4 (66%)	32 (65%)	28
Intermediate	2 (33%)	17(35%)	15
Total	6 (100%)	49 (100%)	43 units

Table 3: Provision of affordable housing

29 The applicant has submitted a viability statement which examines the ability of the scheme to deliver affordable housing provision in accordance with policy targets. This viability

statement is currently being independently reviewed on behalf of Harrow Council - with a view to determining the maximum reasonable amount of affordable housing that the scheme can afford. GLA officers will be party to the findings of the viability review, and following the conclusion of any related discussions, GLA officers will update the Mayor of the detail of the affordable housing package to be secured at the decision-making stage.

30 With regard to housing tenure, draft Policy H7 and the Mayor's SPG sets out a preferred tenure split of at least 30% low cost rent (social or affordable rent, significantly less than 80% of market rent), at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the local planning authority. At the local level, the Harrow Local Plan sets an affordable housing tenure balance of 60% social / affordable rent and 40% intermediate. The current affordable housing offer includes 65% as affordable rent and the remaining 35% as intermediate housing. Whilst the proposal would provide a minimum of 30% low cost rent and 30% intermediate housing in line with the Mayor's SPG, the tenure split does not reflect the borough-wide target within the Harrow Core Strategy. Accordingly, the Council should confirm that the proposed tenure split appropriately responds to the local context in Wealdstone.

31 The applicant has not provided any detail regarding the affordable rent levels or the income thresholds associated with the intermediate units. The applicant and Council must confirm that the proposed rent levels are in line with London Affordable Rent levels within the Mayor's Annual Monitoring Report (AMR) and benchmark rent levels must be detailed for each unit size. In accordance with paragraph 4.7.9 of the draft London Plan, the intermediate homes should be available to people on a range of incomes below the maximum household income, which is currently £90,000 and updated annually in the AMR. The applicant must also confirm the income thresholds prior to any Stage II referral. Once agreed, these ranges and rent levels must be secured within any S106 agreement.

32 The draft London Plan and the Mayor's Affordable Housing & Viability SPG set out expectations for viability review mechanisms to be secured through S106 agreements, including early implementation reviews (if an agreed level of progress has not been made within an agreed time after grant of permission), and late stage reviews (usually triggered at 75% of private sales). Further discussions will be required to determine appropriate review mechanisms for this scheme and GLA officers request early engagement into the wording of the draft S106 agreement to ensure that appropriate wording for review mechanisms, as well as obligations around delivery of affordable housing.

33 In line with the transparency provisions set out in paragraphs 1.18-1.25 of the Mayor's Affordable Housing and Viability SPG, any FVA submitted by the applicant should be published in full on the Council's website.

Children's play space

34 The applicant proposes to incorporate play provision as part of the green link and wider amenity space strategy consented for the master plan (comprising a public open space provision of 27,750 sq.m.). Additionally, the current application introduces communal amenity areas and play equipment at podium level. Whilst GLA officers support this approach, the applicant must demonstrate that the strategic requirements of the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG are addressed in terms of the proposed uplift in residential units. Details of the proposed space, including quantum and types of play elements for each age group, must be made clear. The final provision of play must be secured by condition or s106 agreement.

Urban design

35 Good design is central to all objectives of the London Plan. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. The design policies within chapter 7 and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, views and public realm. Policy 7.4 also requires that new development has regard to its context and makes a positive contribution to local character. The intent of these policies is reflected in draft London Plan Policies D1 and D2.

Site Layout

36 The proposed layout is well thought out and implements the broad principles approved within the outline application. The new development represents an efficient layout of the triangular site, which maximises housing delivery, significantly improves the legibility of the building along Headstone Drive and creates a clearly defined frontage to the green link.

37 The relocation of the health care facility to the ground floor of Plot A3 creates the potential to form an active frontage and new zone of public space along the Headstone Drive edge, which is supported. Notwithstanding this, the applicant should seek to maximise the amount of active frontage along Headstone Drive and the return frontage to the green link and create a legible entrance to the health care facility. The widened footway adjacent to the health care facility is supported. Notwithstanding this, the applicant should review how the health care facility interacts with the adjacent public realm. The location of street trees directly in front of the lobby, whilst supported in urban greening terms, may partially obscure the entrance and could potentially hinder pedestrian movement. GLA officers would welcome further discussion on how the whole of the Headstone Drive frontage is considered as a wider landscaping piece - which integrates with the green link and incorporates trees and appropriate street furniture where possible. At present, GLA officers consider that the proposal represents a missed opportunity to create an active and engaging area of public realm along Headstone Drive.

38 The return frontage of the health care facility along the green link is successful in forming an enhanced edge and visual link to the green, which will encourage pedestrian movement within the site. Following pre-application discussions, the duplex units have been extended along the green and the cycle storage has been relocated. This revised layout is welcomed and creates a strong residential street character. The proposals include a welcome balance of legible entrance to cores and individual front doors onto streets, which will encourage passive surveillance onto the green link.

39 The constraints associated with activating all three frontages of the building are acknowledged. Following pre-application discussions, the western frontage has been designed to minimise areas of dead frontage and not appear as a 'back of house' area. The western podium frontage has been extended westward towards Rokeby Road and the external stairs have been removed. The parking area has also been reconfigured to occupy less of the frontage. These are positive changes that will ensure that the adjacent service road is sufficiently animated and feels safe to use. A high-quality landscaping strategy will further enhance this edge of the building and should be secured by condition.

40 The applicant has demonstrated that the western facade would not prejudice the emerging proposals for the neighbouring Plot B1. Furthermore, the accompanying daylight and sunlight report confirms that the proposal would not have an undue impact on the adjacent residential properties along Headstone Drive, residential units within consented Plots A2, A4 and A5 and the proposed school to the north.

41 The removal of the western stair from the podium amenity space is welcomed. Overall, the podium level has been well-considered to ensure that it is easily accessible to all residents and does not compromise the privacy of the podium level units. The distribution between soft and hard landscaping is supported, however further detailed information should be secured by condition. As previously mentioned, the applicant should also specify how this area responds to the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG.

Height, massing and architecture

42 Whilst the proposal would be noticeably taller than the reserved matters consent, the proposed heights and massing arrangement is supported in terms of optimising the development potential of the site. The six and nine storey elements represent a significant uplift in scale relative to the two-storey housing opposite; however, this is balanced by their refined form and proportions, the articulated base of the building and the significant separation distances (approximately 20 metres) from neighbouring properties. The proposed 14 storey block would introduce a 'landmark' building to address the southern end of the green link, which is supported.

43 The quality of the architecture is generally high and in keeping with the aesthetic of the wider masterplan site. The proportions of facades are well considered and the intention to use high quality brickwork is supported. The appearance of the buildings does not raise any strategic concerns; however, materials, including details of the surface treatments, should be secured by condition to ensure quality.

Density

44 Having regard to the characteristics of this site (discussed in paragraphs 5 to 8 above) the London Plan density matrix (Table 3.2 in support of Policy 3.4) suggests a residential density of between 70 to 130 units per hectare for the application site. The proposal would have a density of approximately 60 units per hectare. Whilst the residential density is marginally lower than the suggested density range, it is acknowledged that this is a mixed use building accommodating a large health centre, and when considered in the context of the wider masterplan the development would broadly accord with target densities at a phase-wide scale. Noting the Opportunity Area and Housing Zone status for this area, GLA officers strongly support the principle of a high quality residential intensification of the application site (Plot A3).

Residential standards

45 London Plan Policy 3.5 establishes the strategic priority afforded to the quality and design of housing developments, with further guidance provided in the Mayor's Housing SPG.

46 The proposed residential quality will be of a high standard. All residential units would meet or exceed the national internal space standards and the private amenity space standards set out in the Mayor's Housing SPG, which is welcomed. The pentagon profile of blocks is shaped to create varied outlook and means of cross ventilation. This arrangement ensures that there are no single aspect north facing units and approximately 95% of the units will benefit from a dual or triple aspect.

47 All units would receive a good level of internal daylight and sunlight. The green link and podium will enjoy good levels of sunlight amenity throughout the year.

Inclusive access

48 The supporting design and access statement demonstrates that inclusive design principles have been considered throughout the development process and will be embedded within the detailed design of the scheme in order to ensure that the public realm, health care centre and residential uses will be accessible by all. This is strongly welcomed. The strategy sets out that the public realm has been carefully designed with appropriate materials, levels and suitably wide footpaths to ensure they can be utilised by all. All building would have level access from the public realm.

49 In line with London Plan Policy 3.8, all of the residential units will meet Building Regulation M4(2) standards, and 10% of the units will be designed to be fully adaptable and adjustable to wheelchair users (M4(3) standards). The Council should secure details of compliance with Building Regulations M4(2) and M4(3) by condition. London Plan compliant Blue Badge parking would be provided.

Energy

50 The applicant has broadly followed the energy hierarchy; however, further information is required before the proposals can be considered compliant with London Plan Policy 5.9 and draft London Plan Policy S12. In terms of 'be lean', further information is required on the following: the construction type including the Fabric Energy Efficiency (FEE) performance; overheating analysis; carbon monoxide energy performance (sample SAP TER/DER worksheets required); and BRUKL sheets. For the 'be clean' element of the hierarchy, further evidence is required in terms of the potential to connect to the district heating network. Specifically, the applicant should provide further evidence as to why this is not achievable. Further information is also required regarding the site-wide network, demonstrating that this network has adequate capacity to supply Plot A3 as well as other intended loads. With regard to the 'be green' part of the hierarchy, the applicant must review the proposed PV panels to maximise coverage and BRUKL sheets are required.

51 The domestic elements reduce carbon emissions by 40% and as such, will exceed the on-site target set within Policy 5.2 of the London Plan. Notwithstanding this, for the reasons mentioned above, the proposed strategy is not currently in line with London Plan policy and should therefore be reviewed. The non-domestic element, which is the health care facility, is expected to reduce carbon emissions by 17%. This does not meet the 35% reductions target set out within London Plan Policy 5.2 and draft London Plan Policy S12. Accordingly, the applicant should consider the scope for additional measures aimed at achieving further carbon reductions.

52 The detailed technical comments have been sent to the applicant and the Council.

Flood Risk and drainage

53 The approach to flood risk management for the proposed development complies with London Plan Policy 5.12 and draft London Plan policy S1.12.

54 The surface water drainage strategy for the proposed development does not currently comply with London Plan Policy 5.13 and draft London Plan Policy S1.13, as it does not give appropriate regard to the drainage hierarchy and greenfield runoff rate. Further details on how SuDS measures at the top of the drainage hierarchy will be included within the development, and how greenfield runoff rate will be achieved should be provided. Additional attenuation storage volume calculations, attenuation tank dimensions, and SuDS maintenance information should also be provided.

55 The proposed development does not meet the requirements of London Plan Policy 5.15 and draft London Plan policy S1.5, as it does not meet the water consumption targets of these policies.

Transport

56 The site would have a new vehicular access off Rokeby Road. Whilst this is supported, it is noted that the proposed primary school located on Plot A6 adjacent to the application site, will also be accessed from the extended part of Rokeby Road. Accordingly, the proposed access and turning arrangements should be revised to minimise impact of non-vehicular road users, especially school children. The swept paths of parking manoeuvres are unacceptable on safety grounds as they indicate that cars entering / existing some spaces will need to manoeuvre back and forth on the pavement. New trees proposed for the entrance of the car park interfere with the visibility splay and reconsideration is required for road safety. Accordingly, Officers consider that removal of some parking spaces and relocation of street trees would reduce the risk to pedestrians, in accordance with Mayoral Vision Zero aims and draft London Plan Policy T2 'Healthy Streets'.

57 A total of 19 parking spaces are proposed on-site for the residential element (0.15 ratio) and 10 spaces for the health care facility. All residential car parking spaces are allocated/leased and it is proposed that four of the 19 spaces will be disabled bays for residents, at 20% of the provision. Whilst this provision is in line with draft London Plan, a disabled parking space should be provided for the health care facility. This space must be provided in a convenient location on or off-street. The electric vehicle charging points provision is policy-compliant but clarification is sought on the management of the car parking; a parking management plan should be secured by condition. The site is in a Controlled Parking Zone and residents of the site should be restricting from applying for on-street parking permits, which should be secured within the section 106 agreement.

58 The residential and Class D1 cycle parking should be revised in line with draft London Plan standards. Long-term cycle storage should also be provided for the D1 use. The applicant should ensure that the cycle parking is safe and secure and is fully accessible to all types of bicycles. Details of cycle parking, including a cycle parking plan, should be provided prior to Stage 2 referral.

59 TfL is satisfied that the trip generation of the site will be consistent with the consented scheme, and that as such the revised proposals will have no additional strategic transport implications beyond those which were identified and committed to previously. The previously agreed contributions secured in the outline consent should however be included in a new s106 with uplift, to reflect indexation and any other cost increase. The original sums were £450,000 to TfL spread over 5 years for enhanced bus services and to Harrow £1m for improvements to the Harrow View/ Headstone Drive junction and £1.5m package towards various transport improvements on local borough roads.

60 The framework residential travel plan is acceptable, however, there is no reference to the proposed health centre. The final travel plan, covering both uses should be secured through the s106 agreement. This will ensure the application complies with the relevant parts of London Plan Policy 6.3.

61 Conditions and section 106 obligations are required to secure the following: parking permit restriction; car club spaces and membership; travel plan; electric vehicle charging points; delivery and servicing plan; and construction logistics plan. The applicant should also clarify

what measures are proposed, including concierge timing and facilities, to minimise freight trips and deliveries associated with the development.

Mayoral community infrastructure levy

62 The Mayor of London introduced his Community Infrastructure Levy (CIL) on 1 April 2012. Most development that receives planning permission after this date will be liable to pay this CIL. The proposed development is in the London Borough of Harrow, where the charging rate is £35 per square metre of floorspace. Further details can be found at: www.london.gov.uk/publication/mayoral-community-infrastructure-levy.

Local planning authority's position

63 Harrow Council is expected to formally consider that application at a planning committee meeting in December 2018.

Legal considerations

64 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

65 There are no financial considerations at this stage.

Conclusion

66 London Plan policies on Opportunity Areas, housing, social infrastructure, urban design, inclusive access, sustainable development, flood risk and transport are relevant to this application. Whilst the scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan for the reasons set out below:

- **Principle of development:** The optimisation of land and contribution towards housing delivery and social infrastructure is strongly supported, in line with the London Plan, draft London Plan and Harrow and Wealdstone AAP.
- **Affordable housing:** The application proposes 43.6% affordable housing by habitable room (63:35 split in favour of affordable rent), which would increase the overall level of affordable housing across development Zone A from 21.5% to 25%. Following the findings of an independent viability review the maximum level of affordable housing must be provided. Early and late stage review mechanisms must also be secured.

- **Urban design & inclusive access:** The proposed development has been generally very well considered in accordance with London Plan Policy 6.10 and draft London Plan Policy D7, further consideration is nevertheless required in terms of the public realm along Headstone Drive and how this interacts with the entrance to the health care facility.
- **Energy:** The energy strategy does not fully accord with London Plan Policies 5.2, 5.6, 5.7 and 5.9. Further information regarding energy efficiency, overheating, the site-wide network, district heating and renewable energy is required. The final agreed energy strategy should be appropriately secured by the Council, along with contributions towards off-site mitigation.
- **Flood risk:** The approach to flood risk management for the proposed development complies with London Plan policy 5.12 and draft London Plan policy SI.12. A revised surface water drainage strategy is required to reflect greenfield runoff rate and additional attenuation storage volume calculations and SuDs maintenance information is required in accordance with London Plan Policy 5.13 and draft London Plan Policy SI.13. Water consumption targets should be revised in line with London Plan Policy 5.156.7,
- **Transport:** Whilst the proposal improves connectivity and conditions for pedestrians in several respects, the proposal is not yet fully in line with London Plan policy and minor revisions are necessary. Various planning conditions and section 106 obligations should also be secured.

67 The resolution of the above issues could lead to the application becoming compliant with the London Plan.

for further information, contact GLA Planning Unit:

Juliemma McLoughlin, Chief Planner

020 7983 4271 email juliemma.mcloughlin@london.gov.uk

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020 7084 2632 email: john.finlayson@london.gov.uk

Graham Clements, Team Leader – Development Management

020 7983 4265 email graham.clements@london.gov.uk

Justine Mahanga, Senior Strategic Planner (Case Officer)

020 7983 4467 email justine.mahanga@london.gov.uk

Emailed response from GLA following submission of addition documents by applicant in response to Stage 1 Report

Matters relating to Flood Risk and Drainage

Sushila Bhandari

From: Stuart McTaggart <Stuart.McTaggart@london.gov.uk>
Sent: 08 January 2019 14:16
To: Justine Mahanga
Cc: Abby Crisostomo
Subject: Harrow View East Plot A3 (2830c) post-Stage 1 water comments

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Justine,

I have reviewed the additional information submitted by the Applicant in response to our Stage 1 comments (Surface Water Drainage Planning Response, December 2018, Peter Brett Associates). My assessment is set out below. Note that this assessment only covers sustainable drainage; no additional information has been submitted to demonstrate compliance with the water consumption requirements of the draft New London Plan.

Original GLA comments (November 2018)	Satisfactorily addressed? (Y/N)	GLA comments (January 2019)
8. The surface water drainage strategy provides an assessment of existing runoff rates, greenfield runoff rates, and attenuation storage required to restrict the 100 year (plus 40% climate change) post-development discharge rate to 5l/s. The London Plan requires developments to meet greenfield runoff rates, or three times greenfield rates where robust justification is provided. Discharge rates can be readily restricted to well below 5l/s using suitably protected orifice plates or proprietary products such as vortex control devices.	Y	The Applicant has clarified that the selected discharge rate of 5l/s is lower than the 100 year greenfield rate.
9. The surface water drainage strategy does not address the London Plan Drainage Hierarchy. Attenuation tanks and green/blue roofs are proposed as the main SuDS measures. No consideration has been given to rainwater harvesting and reuse, or green SuDS integrated into the site landscaping. This approach does not satisfy the requirements of London Plan policy 5.13 (and draft London Plan SI.13). The Applicant should provide more detailed plans for rainwater harvesting and green SuDS.	Y	The Applicant has provided additional details of how the proposal meets the hierarchy, and details of site constraints where this is not possible.
10. The attenuation tank volume has been determined using a detailed method. The proposed attenuation volume is only described by dimensions on the drainage plan and in the calculations. The total proposed attenuation volume should be stated in the body of the report. It is also noted that the proposed attenuation tank appears to clash with three	N	The Applicant should demonstrate that the proposed below-ground attenuation volume can be accommodated within the site constraints.

columns.		
11. The surface water drainage strategy for the proposed development does not comply with London Plan policy 5.13 (and draft policy SI.13), as it does not give appropriate regard to the drainage hierarchy and greenfield runoff rate. Further details on how SuDS measures at the top of the drainage hierarchy will be included in the development, and how greenfield runoff rate will be achieved should be provided. Additional attenuation tank details should also be provided.	N/A	Summary point only – no response required.

Regards,

Stuart McTaggart
Flood Risk, Drainage & Water Policy Officer
 Development, Enterprise & Environment
 Greater London Authority
 City Hall, The Queens Walk, London SE1 2AA

Email: stuart.mctaggart@london.gov.uk
 Web: [Greening London / Greater London Authority](#)
 Follow the GLA's Environment team on Twitter [@LDN Environment](#)
[Sign up](#) to our e-newsletter

Matters relating to Energy Comments

Sushila Bhandari

From: Ian Yenney <Ian.Yenney@london.gov.uk>
Sent: 08 January 2019 16:01
To: Justine Mahanga
Cc: Ioanna Mytilinaiou; Anne-Marie Robinson; Philip Exton; Robbie Thompson
Subject: 2830c Harrow View East Plot A3 Post Stage 1 Energy Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Justine,

Here are the Post Stage 1 Energy Comments for Harrow View East Plot A3 (2830c). The outstanding queries are listed with post stage I Energy comments in **red text**:

1. The Energy Hierarchy has broadly been followed; however, the applicant is required to review their energy proposals to ensure compliance with the London Plan policies.

3. The applicant appears to have assumed a boiler efficiency of 95.9% for this Be Lean section of the energy hierarchy. This is not acceptable. As explained in the latest GLA energy guidance https://www.london.gov.uk/sites/default/files/energy_assessment_guidance_2018_-_update.pdf "the gas boiler performance must be assumed to be equal with Part L notional values for boiler efficiency and controls". **This has not been addressed and remains outstanding.**

5. The applicant is required to provide sample SAP TER/DER worksheets to support the Be Lean stage of the energy hierarchy.
7. The applicant has used benchmark figures to calculate the carbon emissions for the non-domestic areas of the development. This is not acceptable. The applicant should reassess the building using Part L 2013. The BRUKL sheet for the building including efficiency measures alone should be provided to support any savings claimed. Where exact building specifications are not known appropriate assumptions should be made and explained.
27. The applicant is required to provide sample SAP DER worksheets to support the Be Clean stage of the energy hierarchy.
29. The applicant is required to provide a BRUKL sheet to support the savings calculated in the Be Clean stage of the energy hierarchy.
32. The applicant is required to provide sample SAP DER worksheets to support the Be Green stage of the energy hierarchy.
34. The applicant is required to provide a BRUKL sheet to support the Be Green stage of the energy hierarchy. **These comments have not been addressed and remain outstanding. The applicant has provided some example SAP worksheets, but these are unlabelled, and they have provided no BRUKL sheets. The applicant is required to provide SAP TER/DER worksheets for multiple representative dwelling types, and worksheets should be provided for each stage of the energy hierarchy and clearly labelled for this. BRUKL sheets are required for for each stage of the energy hierarchy and should be clearly labelled for this. It is acknowledged that the healthcare facility is being constructed as shell only, but the applicant can model the building with the proposed shell and assumed fit-out specification, and provide the BRUKL output. The applicant should outline the calculation method for site wide emissions (i.e. how the SAP / BRUKL results have been applied to calculate the total figures for the site).**

8. In line with the latest GLA guidance the applicant should report the overall Part L Fabric Energy Efficiency (FEE) performance of the development for both the baseline and the 'be lean' stages of the energy hierarchy in MWh/year and kWh/m2. The percentage of improvement (%) should also be provided. **The applicant has confirmed that the weighted average TFEE is 48 kWh/m²/yr and the weighted average DFEE is 43.2 kWh/m²/yr, and that the improvement over the baseline is 10.4%. The applicant should confirm whether the DFEE and TFEE results represent multiple units, and provide further example DFEE and TFEE worksheets to support**

this. The applicant should provide the overall Part L Fabric Energy Efficiency (FEE) performance of the development for both the baseline and the 'be lean' stages of the energy hierarchy in MWh/year.

10. A domestic overheating checklist is included in the GLA's energy guidance which should be completed and used to identify potential overheating risk and passive responses early in the design process. The applicant is required to complete the overheating checklist so that the development characteristics can be better understood. This has not been addressed and remains outstanding.

11. A Dynamic Overheating Analysis has been undertaken to assess the overheating risk within the dwellings using the CIBSE TM59 methodology and the London Design Summer Year 1 (DSY1) weather file: 2020s, High emission, 50% percentile scenario.

12. The results show that the design proposals are not anticipated to meet the CIBSE recommendations for comfort due to a small number of failing properties. The applicant is required to investigate and adopt further passive measures (in line with the Cooling Hierarchy) to avoid the risk of overheating now and in future climate.

13. The applicant should also investigate the risk of overheating using the DSY 2 & 3 weather files.

This has not been addressed and remains outstanding. The applicant should demonstrate that all relevant spaces meet CIBSE TM59 recommendations using DSY1, which will require them to adopt further passive measures. They should also report the risk of overheating against the DSY 2 & 3 weather files.

14. The area weighted average (MJ/m²) and total (MJ/year) cooling demand for the actual and notional building should be provided.

This has not been addressed and remains outstanding.

15. To assess the opportunity for the non-domestic areas to be naturally ventilated a Dynamic Overheating Analysis to assess the overheating risk should be carried out. This should follow the CIBSE TM52 methodology for the London Design Summer Year 1 (DSY1) weather file: 2020s, High emission, 50% percentile scenario. The applicant should also investigate the risk of overheating using the DSY 2 & 3 weather files.

This has not been addressed and remains outstanding. The applicant should clearly describe the ventilation strategy for the building and ensure that the actual development's cooling demand is lower than the notional (for all mechanically cooled areas). For those areas that are naturally ventilated, a CIBSE TM52 analysis is still required.

16. The applicant has identified that a district heating scheme is likely to be developed for the wider masterplan (Harrow North DHN); however is not proposing to connect to it, apparently due to phasing and cost concerns. Inadequate evidence has been provided to support lack of connection. In line with GLA energy guidance, development and connection to a district heat network should be prioritised. The applicant is required to revisit the feasibility of connection to the district wide scheme. Feasibility studies, copies of meeting minutes and correspondence and with stakeholders should be provided to support the decision on connection. If it appears that phasing is an issue the applicant may propose use of temporary plant to facilitate heat provision and present a plan for later connection.

The applicant has confirmed that they have been consulting with the London Borough of Harrow to explore the feasibility of a connection to the Harrow North DHN, but that the DHN is in an early stage of development and hence cannot connect at present. However they do not provide any correspondence to evidence this, which is still required.

The applicant has proposed that the energy centre will be designed with the potential to connect to district heating in future, which is welcomed. They have provided a drawing showing a safeguarded route for district heating pipework, but are also required to provide evidence for space provision for heat exchangers in the plant room and isolation valves.

17. The applicant is required to provide evidence that it has investigated the existence of alternative district heat networks in the area.

This has not been addressed and remains outstanding.

19. The applicant is required to include distribution losses within its carbon factor calculation.

This has not been addressed and remains outstanding. The energy centre for which the carbon factors are provided includes CHP, gas boilers, and air source heat pumps. As well as providing further detail towards the calculation of carbon factors, the applicant should confirm further details for the energy centre including:

- the current status of the energy centre i.e. is it existing, or being developed as part of these proposals, or being developed as part of other development proposals?
- the type of CHP engine, specification details, and manufacturers details

- the total number of units to be supplied
- outline of the phasing schedule for connection
- consideration of the potential to replace CHP engines with other technologies in future.

20. The applicant is required to show the calculation methodology it has used for determining the proportion of annual demand met by each heat source.

This has not been addressed and remains outstanding.

21. The applicant is required to evidence the efficiencies assumed for heat source at the temperatures assumed.

This has not been addressed and remains outstanding.

22. The applicant is required to evidence that the proposed site wide network has adequate capacity to supply Plot A3 as well as all other intended loads.

This has not been addressed and remains outstanding.

23. The applicant has provided a drawing site-wide heat network. The applicant should highlight the location of Plot A3.

This has not been addressed and remains outstanding.

25. The applicant is required to commit to providing capped connections to enable non-domestic heat areas to connect to the site-wide network.

This has not been addressed and remains outstanding.

35. A detailed roof layout should be provided demonstrating that the roof's potential for a PV installation has been maximised. The applicant is required to maximise the on-site savings from renewable energy technologies, regardless of the London Plan targets having been met, and therefore the PV proposals should be reviewed.

This has not been addressed and remains outstanding.

37. The carbon dioxide savings exceed the on-site target set within Policy 5.2 of the London Plan. However, the proposed strategy is not in line with the GLA policy and therefore it should be reviewed. The revised carbon emissions should be submitted for all stages of the energy hierarchy.

40. The non-domestic carbon dioxide savings fall short of the target within Policy 5.2 of the London Plan. The applicant should consider the scope for additional measures aimed at achieving further carbon reductions.

41. The applicant is required to confirm either the amount of funding that will be paid into the borough's carbon offset fund or that an agreement has been reached with the borough that the applicant will undertake a carbon reduction project off-site to meet the non-domestic shortfall. In both cases evidence of correspondence with the borough confirming the approach should be provided.

This has not been addressed and remains outstanding. The applicant suggests that the site as a whole meets the 35% target and that any shortfalls associated with certain units/uses would be compensated for elsewhere within the development. This is not in accordance with policy, and both domestic and non-domestic uses must separately meet Policy 5.2, and if relevant, separately address any requirement for carbon offset.

42. All comments above should be addressed before compliance with London Plan energy policy can be verified.

Kind regards,

Ian

APPENDIX 5: Transport for London response

Transport for London



Our ref: 18/3969
Your ref: P/3671/18

Transport for London
Spatial Planning

Sushila Bhandari
Planning Services
Harrow Council
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Harrow
HA1 2XY

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7th November 2018

Dear Sushila,

Plot A3 at Harrow View East (the Kodak Site)/Headstone Drive -TfL's initial comments

This letter relates to the detailed application for the redevelopment of the above portion of the Kodak site, previously consented in outline and described as a Health Care Facility (1,386 sqm, class D1) and 127 Flats.

Please note that these comments represent the views of Transport for London officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority.

Site Location & Context

The application site is part of the larger Kodak factory site masterplan, which falls within the Harrow and Wealdstone Opportunity Area as identified by the London Plan and draft London Plan (dLP). Harrow View East is bounded by Pinner Park Gardens to the north, the Network Rail (London to Birmingham) alignment to the east, Headstone Drive to the south and Harrow View and Rokeby Road to the west; of this site Plot A3 is the south west corner which abuts Rokeby Road.

The closest station to Plot A3 is Harrow & Wealdstone station approximately 500m to the south east which provides services on the National Rail, London Underground (Bakerloo Line) and London Overground networks. Three bus routes H9, H10 and H14 operate adjacent to the site on Headstone Drive although a further 6 routes can be accessed from Harrow and Wealdstone station. There is an on-road non-segregated cycle route (route 87) along Headstone Drive. There are no sections of the Transport for London Road Network (TLRN) or Strategic Road Network (SRN) close to the site. The Public Transport Accessibility Level (PTAL) of the site has been demonstrated to be 3, on a scale of 1-6 where 6 is the highest.

Since the site wide permission was granted in 2012 the Mayor of London has published the New Draft London Plan (dLP) in December 2017 and the publication of Draft Minor Suggested Changes in August has added more material weight in the consideration of

MAYOR OF LONDON



VAT number 756 2770 08

planning proposals. TfL seeks to reflect the thrust of its new standards, policies and visions (for example, Healthy Streets and “Vision Zero” (cycling collisions)).

Access and Car Parking

Vehicular access to the site would be from a new access off Rokeby Road. Harrow Council is undertaking studies into the existing Headstone Drive/Rokeby Road priority junction. Consequently the TA shows just the existing, very wide junction built for Kodak's freight vehicles and states the options include a mini-roundabout and a ghost island priority junction. The end design, expected to be included in a s278 agreement, should have maximum benefits and where feasible priority for pedestrians and cyclists and for buses.. Any other highway works should at the least be demonstrated to not have an adverse impact on these sustainable modes but the aim should be to improve provision for walking and cycling and bus operation in any highway scheme.

Bearing in mind there is to be a new Primary School built on Plot A6 adjacent the subject plot also from the extended part of Rokeby Road, the access and turning arrangements for Plot A3 are requested to be revised minimise impact on non-vehicular road users, especially school children. A Road Safety Audit (RSA) of the proposals would have provided added insight into impacts, but in its absence TfL considers the supplied swept paths of parking manoeuvres are partly unacceptable on safety grounds: the middle diagram on plan 39048-5502-007 B shows cars entering/exiting the second and/or fifth (un-annotated) spaces will need to manoeuvre back and forth on the pavement to do so. It is hoped that the Council will seek adoption of the full width of footway from kerb to building line, if this has not already been effected.

Furthermore, new trees planted at the entrance of the car park interfere with the visibility splay and thus there should be a reconsideration to enable retention of the trees and safe operation of the car park.

This design does not meet Healthy Streets/Vision Zero policy aims and TfL would re-iterate its pre-application recommendation to remove some spaces to allow room for all turns to take place without risk to passing pedestrians. TfL recognises the Council is however the ultimate design arbiter given this is a local road.

Car Parking

The parking provision for the residential units is 19 parking spaces, a ratio of 0.15 spaces per unit, and the Health Centre is provided with 8 parking spaces located on site, with an additional two spaces located on the Green Link outside of Plot A5, which is an improvement on their previously-proposed location on Rokeby road. The applicant intends these spaces will be for use by GP staff only who are required to make home visits to patients and this should be secured through a suitable condition or s106 obligation. These quantities are in line with the Draft London Plan guidance as is the electric vehicle charging points provision (which should be secured by condition).

All residential car parking spaces are allocated / leased and four of the 19 spaces will be disabled bays for residents (20%). TfL considers that it is essential that the disabled bays are allocated on the basis of current need only to those with Blue Badges. They should not be sold or leased with particular flats even if these are designed for wheelchair users. In line with NDLP policy a Parking management Plan should be conditioned to address this point and also the allocation and use of the general spaces, to address the issue of parking

elsewhere than in designated places including by parents/carers dropping off and picking up pupils from the adjacent school and to manage the cycle parking. The proposed motorcycle parking is two spaces within the car park, and two car club bays are provided on the wider site.

Car-borne visitors to the Health Centre can use the existing P&D bays on Headstone Drive to the west of Rokeby Road, which is acceptable.

There is reference to a revised car parking management plan having been submitted but this has not been uploaded on the website and any discussion of such matters in the TA is very general. Clarification is requested and in any case measures identified in an approved version of this document should be secured by condition. The site is in a Controlled Parking Zone and a 'Permit-Free' legal agreement will be required by s106 agreement.

Cycle Parking

The resident pedestrian and cycle accesses would be located separately at each residential block, either from Rokeby Road or the Greenway within the Aperture Works site. The Health Centre will be accessed from Headstone Drive.

Short-term cycle parking has been indicated in the correct quantity (4) but the spaces shown by the health centre access are not covered against the elements as they should be and would be less attractive for use by people attending appointments. The quantity of long-term cycle spaces is not compliant with draft London Plan standards, which at 1 space per studio, 1.5 spaces per 1 bedroom unit, 2 spaces per all other dwellings require an uplift of 21 spaces from the 210 proposed.

Furthermore, long-term cycle storage for the D1 use has been omitted; staff should similarly have dedicated secure, covered storage at the dLP standard of 1 space for FTE staff.

The importance in storage quality and variety has been recognised in the commitment in the TA that long-stay cycle parking would be provided in secure, covered stores within each core, and would be fully accessible to all types of bicycle including cargo cycles and tricycles, plus all spaces would be at ground floor too involving passing through no more than two sets of doors. This is welcome however with a detailed application like this there should be a dedicated cycle parking plan(s) supplied to indicate that sufficient space has been allowed for manoeuvring bikes; these plans are requested prior to determination and not left until condition discharge time.

Walking and Cycling

The Harrow View East (HVE) green link runs north-south adjacent to Plot A3, including a continuous pedestrian and cycle route along the shared surface on the eastern edge of the green link. This will connect in later phases to the green link further north, and provide connection through the whole Kodak site. There is an existing Zebra Crossing at the southern end of the green link, which will be upgraded to a Tiger Crossing for added cyclists' convenience and safety. The applicant has undertaken to pay for these works secured by legal agreement. This is welcomed; TfL would also welcome improvements to the existing discontinuous cycle routing on Headstone Road and links onwards to the station and supports the Council in thus mitigating increased demand for convenient and

safe cycling from this development. This was presumably covered in the s106 cycling improvements contribution secured at Outline consent.

Trip Generation, Public Transport Impact

Following the Pre Application advice the applicant has revised its TRICS-derived trip rates with more appropriate sites and whilst the trip rate across all modes looks slightly low TfL is satisfied that the trip generation of the site will be consistent with the consented scheme, and that as such the revised proposals will have no additional strategic transport implications beyond those which were identified and committed to as part of the previous application.

Mitigation

In order for the revised application to be considered acceptable, TfL would however expect the previously secured mitigation measures to be retained as part of these proposals. This includes; a sum of £1m, payable to the borough towards improving the operation of the Harrow View/ Headstone Drive junction; a contribution of £450,000, payable to TfL, towards mitigating the impact of the proposed development on the capacity of the local bus network; a further £1.5m towards sustainable transport and local connectivity. Amongst other items it is understood that this 'sustainable transport' contribution is intended to be directed towards the provision of Legible London signage (£15,000), cycle and pedestrian improvements between the site and Harrow & Wealdstone station and town centre (£270,000), general parking controls in the locality of the site (£150,000), bus stop upgrades and countdown facilities (£62,000) and a travel plan performance bond (£100,000).

The sums need to be increased to reflect increases which would have otherwise been due through indexation and current costs if higher. TfL will update soon on the latter infrastructure costing aspects.

Travel Planning, Servicing and Freight

The applicant has supplied a framework residential travel plan with an acceptable breadth of content and targets; however there is no reference to the Health Centre -travel plan framework TfL requested at pre-application stage. It will be very important to facilitate both staff and visitors to identify what choices of non-car travel they can use and thus a requirement for a travel plan covering each of the two uses should be secured in the s106.

Whilst swept paths have been submitted showing a car safely passing a refuse van parked in two places on Rokeby Road, it is unclear whether the aims of Policy T7 Freight & servicing of the dLP, especially parts G and H have been followed. Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time. Furthermore, appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing. The applicant should clarify intended timing restrictions and concierge facilities for the whole site.

In keeping with current policy requirements, TfL would also expect both a detailed delivery and servicing plan, and a detailed construction logistics plan to be secured for the site by condition. These should identify what efficiency and sustainability measures will be implemented whilst the development is being built/ once it is operational.

Community Infrastructure Levy (CIL)

Since the original application was approved, the Mayor has introduced a London-wide Community Infrastructure Levy (CIL). The rate for Harrow is £35 per sqm. In June 2017, the Mayor published proposals for an MCIL2. This would be levied from April 2019, and would replace both MCIL and the Crossrail S106 contributions scheme.

The required CIL should be confirmed by the applicant and the Council once the components of the development or phase have been finalised. Harrow Council has also implemented their CIL since the original application was approved, confirmation that this does not impact on the s106 obligations listed above would be appreciated.

I trust that provides you with a better understanding of TfL's current position with regards to these development proposals. Should you have any questions or require clarification on any of the points raised please don't hesitate to contact me.

Yours sincerely

Rachel Yorke
TfL Spatial Planning- Principal Planner

Email: rachelyorke@tfl.gov.uk

Direct line: 020 3054 7030

Emailed response from TfL dated 3.01.2019

Dear Sushila

Thank you for forwarding me the attached comments from the applicant. I have the following responses, which I have copied to the latter's representative. For the most part the explanations they provided are acceptable and require no further discussion, however there are one or two queries below I would appreciate feedback on.

1. Access and Car Parking

Explanation and tracking acceptable however I would still content that the 'first' space through the entrance is poorly located right alongside a wall and manoeuvring will require the car to partly overshoot the crossover and thus cross the pavement – which pedestrians will not be expecting with potential safety consequences. I will let the applicant's comment that the tree trunks by the entrance "will not be large enough to obscure a child" lie, though at which point in the tree's life – immature or mature- this refers to is not clear. Regarding the comment about the junction layout, I will raise this separately with the Council.

2. Cycle Parking

The Mayor expects applications – whether new or a detailed scheme following outline permission – to meet or, if space is tight, show a significant uplift towards the more challenging cycle standards of the **draft** London Plan. The applicant's clarified figure of 222 total spaces given meets the latter's quantity requirements for long term parking (residential) but I think this total is for long and short term parking (4) together. Thus there would appear to be a eight space deficit in long term parking? The suggestion of controlling the number and location of D1 spaces is cautiously accepted but it would be appreciated if the draft wording could be shared prior to publication.

3. Mitigation

TfL will endeavour to supply updated infrastructure costings prior to publication of the committee report.

4. Travel Planning & Servicing planning.

The explanation why a dedicated Health Care Travel Plan would not be appropriate and should be made a pre-occupation condition is accepted; the travel patterns of users in as far as patients seeking consultation or treatment are concerned would be reasonably easy to predict using TRICS or surveys of other health centres. The explanation on the D&S Plan is accepted.

5. Disabled persons parking for D1 use

The intention behind seeking this is that disabled **staff** at the health centre should have convenient access, continuously over the working day, to a parking space. This application should according to dLP policy provide a space on-site (which it does not currently) OR off-site but given the explanation of the distance such persons would need to travel to a space, it does not meet T6.5 C "Development Disabled persons parking bays should be located on firm and level ground, as close as possible to the building entrance or facility they are associated with". I hope further consideration will be given to addressing this, in order not to preclude disabled members of the community for whom using the (limited) public transport is not practical the future opportunity to work at this site.

I hope this is helpful.

Regards

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