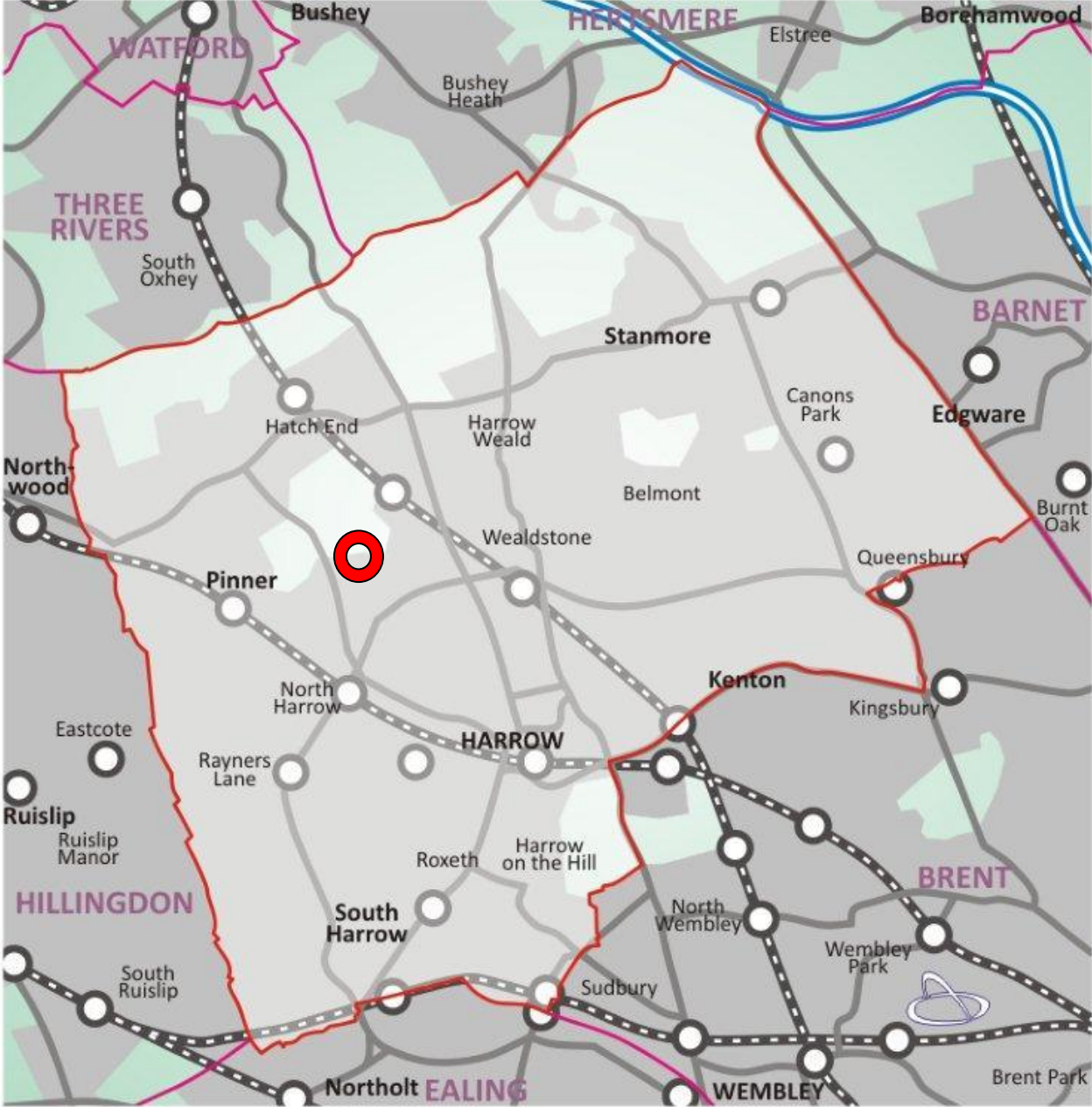


 = application site



<p>Plots D1, D2, D4, D5 and D6 (Development Zone D) of Harrow View East Masterplan Site Harrow View East (Former Kodak Factory Site) Headstone Drive</p>	<p>P/3944/19</p>
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LOCATION PLAN HERE (CRW)

LONDON BOROUGH OF HARROW

PLANNING COMMITTEE

22nd JANUARY 2020

APPLICATION NUMBER: P/3944/19
VALIDATE DATE: 10/09/2019
LOCATION: PLOTS D1, D2, D4, D5 AND D6 (DEVELOPMENT ZONE D) OF HARROW VIEW EAST MASTERPLAN SITE
HARROW VIEW EAST (FORMER KODAK FACTORY SITE)
HEADSTONE DRIVE
HARROW
WARD: MARLBOROUGH
POSTCODE: HA1 4TY
APPLICANT: HARROW VIEW LLP - MR TOM OXLEY
AGENT: CARTER JONAS
CASE OFFICER: SUSHILA BHANDARI
EXPIRY DATE: 31/12/2019

PROPOSAL

Full planning application for the development of Plots D1, D2, D4, D5 and D6 at Harrow View East (former Kodak Factory) for residential dwellings (use class C3 - including an Extra Care Facility), café/restaurant space (Use Class A3), flexible active uses (Uses Classes, A1, A2, B1(a) and D1); together with new roads and other means of access and circulation, associated car and cycle parking, open space, landscaping and ancillary development including all necessary infrastructure works

The Planning Committee is asked to:

RECOMMENDATION

- 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 is to act as the Local Planning Authority for the purposes of determining the application, delegate authority to the Interim Chief Planning Officer in consultation with the Director of Legal and Governance Services for the completion of the Section 106 legal agreement and other enabling development and issue of the planning permission,

subject to amendments to the conditions, including the insertion or deletion of condition as deemed fit and appropriate to the development or the amendments to the legal agreement as required. The Section 106 Agreement Heads of Terms would cover the following matters:

1. Affordable Housing

- Provision of 472 affordable homes: 210 shared ownership (inclusive of discount market sales units) and 262 affordable rent (inclusive extra care units).
- 10% of affordable rent accommodation to be constructed and ready for occupation as wheelchair standard home.
- Early stage review

2. Bus Service Contribution

- Payment of a financial contribution towards the funding of two extra peak services on H9, H10 or H14 route for a period of 5 years.

3. Carbon Offset

- Payment of a total financial contribution of £964,436 towards carbon offset. Payable upon commencement of each phase on a pro rata basis.
- Provision of certification of actual/ as-built carbon emission achieved on site and payment of any shortfall in carbon reductions calculated at a rate of £60 per tonne of carbon to be offset per year, over a 30 year period.

4. Design Scheme

- To use reasonable endeavours to employ the main scheme Architect on an overseeing/ executive role until practical completion.

5. Energy Centre

- Connection of each phase to the Energy Centre on the wider Harrow View East masterplan site.
- Provision of a safeguarding route to a connection to any future wider District Heat Network.

6. Highways and Parking

Travel Plan

- Submission of a travel plan based on the framework travel plan for each phase of development prior to occupation and to cover an initial monitoring period of 5 years
- Appointment of a travel plan co-ordinator.

Parking – Car Club Provision

- Provision of two car club parking spaces within the site boundary
- To enter into an agreement with an approved car club operator to operate the car club

Highways Agreement

- To enter into a Section 38 Agreement under the Highways Act 1980 for Avenue North/ South, providing the road can be connected to an adopted highways

7. Employment and Training Plan

- Payment of local Employment Contribution to the Council upon commencement of development and to be used towards employment and training initiatives within the Council's administrative area.
- Submission of an employment, training and recruitment plan to the Council for its approval

8. Legal Costs and Monitoring Fee

- 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 28 February 2020 or as such extended period as may be agreed by the Interim Chief Planning Officer, 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 (2019), 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 Zones B to D of the masterplan site and has already secured reserved matters permissions for development plots B1, C1 and D7 to bring forward the substantive section of the green link on the approved masterplan site and a total of 810 new homes, leisure and community floor space as well as a new energy centre located on Plot D8.

This application solely relates to development plots D1, D2, D4, D5 and D6 located within Development Zone D of the approved masterplan site, which are located centrally located within the Harrow View East masterplan site.

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 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 (2019), 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:	Large scale major development
Council Interest:	None
GLA Community Infrastructure Levy (CIL) Contribution (provisional):	£6,659,820 (no social housing discount applied and would be payable on a phased basis)
Local CIL requirement:	£12,198,770 (no social housing discount applied and would be payable on a phased basis)

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.

PART 1: Planning Application Fact Sheet

The Site	
Address	Plots D1, D2, D4, D5 and D6 (Development Zone D) of Harrow View East Masterplan Site Harrow View East (Former Kodak Factory Site) Headstone Drive Harrow HA1 4TY
Applicant	Harrow View LLP - Mr Tom Oxley
Ward	Marlborough
Local Plan allocation	Site 02 - Kodak and Zoom Leisure
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		
Total Unit Numbers	1,226	
Density	Proposed Density hr/ha	858 hr/ha
	Proposed Density u/ph	325 units/ha
	PTAL	3
	London Plan Density Range	70-170 dwellings/ha
Dwelling Mix	Studio (no. / %)	91 (7.35%)
	1 bed (no. / %)	561 (45.8%)
	2 bed (no. / %)	439 (35.8%)
	3 bed (no. / %)	135 (11%)
	4 bed (no. / %)	0 (0%)
	Overall % of Affordable Housing	40%
	Affordable Rent (no. / %)	262 (24.4%)
	Intermediate (no. / %)	210 (15.7%)
	Private (no. / %)	754 (60%)
	Commuted Sum	N/A
	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 Classes A1/ A2/ A3/ B1a and D1
	Proposed Use Class(es) sqm	1,090
Employment	Existing number of jobs	N/A
	Proposed number of jobs	30-80

Transportation		
Car parking	No. Existing Car Parking spaces	N/A
	No. Proposed Car Parking spaces	371
	Proposed Parking Ratio	0.3 spaces: 1 unit
Cycle Parking	No. Existing Cycle Parking spaces	N/A
	No. Proposed Cycle Parking spaces	1,919
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 Collection	Summary of proposed refuse/recycling strategy	Each Core will have its own bin store adjacent to

		the entrance lobby with separate bins for the collection of general waste and recycling. Those units with own front garden will have their own refuse store.
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Sustainability / Energy	
BREEAM Rating	N/A
Development complies with Part L 2013?	Yes – 56.47% reduction
Renewable Energy Source / %	Photovoltaics - Further 10% reduction

PART 2: Assessment

1.0 SITE DESCRIPTION

- 1.1 The subject site is known as development plots D1, D2, D4, D5 and D6 located centrally within the Harrow View East masterplan site and located within Development Zone D. It is bounded by Waverley Industrial Estate to the south east, Development Zone A (owned by London and Quadrant) to the south, the green link to the west, Plot C1 (residential) to the northwest and Plot D3 (designated strategic industrial land (SIL)) to the northeast.
- 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. Development has already commenced on development plot D7 owned by the applicant and will deliver 460 new homes. The applicant has also secured reserved matters permission for development plots B1 and C1 which will deliver a further 350 new homes and leisure and community floor space.
- 1.3 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.

- 1.4 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.
- 1.5 The following parameters apply to Development Zone D which is set by the outline permission (and subsequently amended via non-material minor amendments applications):
- Employment (B1, B2, B8) – max 10,240sqm (located within Plot D3)
 - Residential (C3) – max 800 homes
 - Senior Living (C2) – max 4,730sqm
 - Community Centre – max 550sqm
 - Multi-storey car park – max 8,900sqm
 - Energy Centre – max 300sqm
 - Green Link – min 10,369sqm
 - Height range from 4 storeys to 10 storey

2.0 PROPOSAL

- 2.1 The proposed seeks full planning permission for plots D1, D2, D4, D5 and D6 for 1,226 new homes (use class C3 – including 60 unit extra care facility), 362sqm of café/ restaurant floorspace (use class A3) and 728sqm of flexible active floorspace (falling within use classes A1, A2, B1(a) and D1). The proposal would also include associated new roads and other means of access and circulation, associated car and cycle parking, open space, landscaping and ancillary development including all necessary infrastructure works. The site is hereon referred to as HVE Phase III for the purposes of this report.
- 2.2 A breakdown of the proposed development by plot is listed below.
- Plot D1***
- 2.3 This plot would consist of 310 residential apartments, of which 37 would be Intermediate housing. 185 units are proposed to be 1 bed, 96 units would be 2 bed and there would be 29 x 3 bed units (27 units being 4 person and 2 units being 5 person). 42 of these units would be wheelchair accessible units.
- 2.4 The buildings would range in height from 2 storeys to 15 storeys arranged in five blocks with 2 storey links connecting the three distinctive towers all at the heights of 15 storeys.

2.5 The ground floor of building D1.4, located on the prominent corner of Avenue South and the neighbourhood square would include 120sqm of flexible active use floorspace (Use Classes, A1, A2, B1(a) and D1).

2.6 63 standard parking spaces are proposed within the podium parking area, along with a further 13 accessible parking spaces and 2 motorcycle spaces. 528 long stay cycle spaces are proposed along with 9 short stay cycle spaces. In terms of non-residential cycle parking spaces, 1 long stay space and 4 short stay spaces are proposed.

Plot D2

2.7 This plot would consist of three distinctive elements. Part of this plot would consist of 4 stepped blocks, ranging from 7 to 10 storeys in height arranged around a podium. This part would comprise 222 residential units of which 123 units would be for Discount Market Sale (Intermediate). 86 units are proposed to be 1 bed (1 person), 61 units would be 1 bed (2 person), 61 units would be 2 bed (3 person), 9 units would be 3 bed (4 person) and 5 units would be 3 bed (5 person). 14 units are proposed to be wheelchair accessible units.

2.8 This block would include 102sqm of flexible active use floorspace (Use Classes, A1, A2, B1(a) and D1). A restaurant/ café is also proposed which would provide an additional 96sqm of commercial floorspace.

2.9 The proposal would include 47 standard parking spaces located within the podium, 6 accessible parking spaces and 2 motorcycle spaces. 328 long stay cycle spaces would be provided along with 7 short stay spaces for the residential aspect of the proposal. As for the non-residential uses, 2 long stay spaces would be provided and 6 short stay spaces.

2.10 The second part of this plot would provide an 'extra care facility' comprising 60 senior living units (Use Class C3), within a 7 storey 'L' shaped building. All units would be affordable rent and it is proposed to include variety of communal and staff facilities. 58 units would be 1 bed (2 person) and 2 units would be 2 bed (3 person). 6 units would be wheelchair accessible units.

Plot D4

2.11 This plot would comprise 279 residential apartments, all of which would be for market sale. This plot will be comprised of 6 blocks ranging in 6 to 14 storeys in height. 134 units would be 1 bed (2 person), 112 units would be 2 bed (3 person) and 25 units would be 3 bed (4 person). The proposal would include 28 wheelchair accessible units.

2.12 The proposal would also include 2 restaurant/ café units (Use Class A3), one having a floorspace of 142sqm and the other having a floorspace of 124sqm. These units would be located on the ground floor of building D4.6 facing onto the neighbourhood square and the ground floor of building D4.2 fronting the park.

2.13 59 standard parking spaces are proposed located within the podium, along with 5 accessible spaces and 4 motorcycle spaces. 489 long stay cycle spaces would be provided and 8 short stay spaces. In terms of the non-residential use, 2 long stay spaces would be provided, along with 8 short stay spaces.

Plot D5

2.14 This plot would comprise 103 residential units, all of which would be for market sale. 3 units would be 1 bed (1 person), 58 units would be 1 bed (2 person), 34 units would be 2 bed (3 person), 2 units would be 3 bed (4 person) and 6 units would be 3 bed (5 person). 12 units are proposed to be wheelchair accessible.

2.15 The proposed building would be 7 storeys in height stepping up to a 18 storey tower block.

2.16 The proposal would include 319sqm of flexible active floorspace (Use Classes, A1, A2, B1(a) and D1), located on the ground floor and fronting the park.

2.17 The proposal would provide 174 long stay cycle parking spaces and 4 short stay spaces. In terms of non-residential uses, 3 long stay cycle parking spaces are proposed and 9 short stay spaces.

Plot D6

2.18 This plot would comprise 252 residential apartments, of which 50 would be Intermediate Affordable housing and 202 would be Affordable Rent.

2.19 The buildings would be arranged in two blocks, configured around podium decks, ranging from 6 to 8 storeys in height. 65 units would be 1 bed (2 person), 45 units would be 2 bed (3 person), 89 units would be 2 bed (4 person) and 53 units would be 3 bed (5 person). 20 units would be wheelchair accessible.

2.20 187sqm of flexible commercial floorspace (Use Classes, A1, A2, B1(a) and D1) would be located on the ground floor of building D6.6, facing the neighbourhood square.

2.21 The eastern block in Plot D6 would provide 37 standard parking spaces within the podium along with 7 accessible spaces. The western block in Plot D6 would provide 34 standard parking spaces along with 7 accessible spaces. 498 long stay cycle parking spaces would be provided and 8 short stay spaces. In terms of the commercial use, 2 long stay cycle parking spaces would be provided along with 6 short stay spaces.

Public Realm

2.22 The Primary Street as originally approved under the outline permission P/2165/15 would be carried through this proposal and would have two sections, Avenue South linking to Development Zone A of the Harrow View East (HVE) masterplan and Avenue North link to Development Zone C of the HVE masterplan. These two routes are connected by a new neighbourhood square that fronts Plots D1, D2 and D6.

- 2.23 Residential streets are proposed between the different Plots that provide access to residents and serving only and would feature some on street parking and defensible landscaping.
- 2.24 A woodland play area is proposed to the south of block D1.1 (Plot D1) and a linear park to the east of block D1.5 (Plot D1).
- 2.25 A further play space is proposed in front of blocks D2.1 (Plot D2) and D4.2 (Plot D4) which would also be in close proximity to the main green link.

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
P/3405/11 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.	Granted 21/12/2012

<p>P/2182/15 Modification to section 106 planning agreement relating to planning permission P/3405/11 dated 21 December 2012 as varied by a deed of variation dated 22 December 2014 to define and split the obligations between the East Land (Harrow View East) and West Land (Harrow View West)</p>	<p>Approved 9/12/2015</p>
<p>P/2165/15 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 (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>Granted 09/12/2015</p>
<p>P/4367/17 Non-Material Amendment To Planning Permission P/2165/15 Dated 09/12/2015 To Allow Changes To Access Points The Green Link Height Locations And Phasing Boundaries</p>	<p>Approved 24/10/2017</p>

(Development Zones B, C and D only).	
P/5023/17 Non-Material Amendment To Planning Permission P/2165/15 Dated 09/12/2015 To Allow Changes To Access Points The Green Link Height Locations And Phasing Boundaries (Development Zones B, C and D only)	Approved 20/12/2017
P/5079/17 Approval of all reserved matters for development plot D7 and the Green Link of Development Zone D of the Harrow View East Masterplan and details pursuant to conditions 7(Urban Design Report), 8(Energy Strategy), 9(Ecology and Biodiversity Strategy), 11(Housing Schedule), 12(Daylight and Sunlight Assessment), 13(Surface Water Drainage Strategy), 14(Accessibility Strategy), 15(Lighting Strategy), 16(Refuse Strategy), 17(Noise and Vibration Strategy), 18(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)	Approved 02/02/2018
P/5244/17 Demolition of existing building surrounding factory chimney, retention of existing chimney and construction of a new building comprising an energy centre (Sui Generis) and a flexible community space (Use Class D1/D2)	Granted 05/02/2018

<p>P/3004/18 Non-material amendment to planning permission P/2165/15 dated 9/12/2015 to correct factual inaccuracies associated with the approved parameter plans and enable non-material changes to the approved parameter plans (zonal boundaries, limits of deviation and building heights)</p>	<p>Approved 03/08/2018</p>
<p>P/3892/18 Approval of all reserved matters for development Plots B1 and C1 and sections of the Green Link of Development Zones B and C of the Harrow View East Masterplan and details pursuant to Conditions 7 (Urban Design Report), 8 (Energy Strategy), 9 (Ecology and Biodiversity Strategy), 11 (Housing Schedule), 12 (Daylight and Sunlight Assessment), 13(Surface Water Drainage Strategy), 14 (Accessibility Strategy), 15 (Lighting Strategy), 16(Refuse Strategy), 17 (Noise and Vibration Strategy), 18 (Arboricultural Strategy), 19(Landscaping), 20 (Transport Strategy), 21 (Levels), 22 (Open Space Strategy) following outline planning permission granted under P/2165/15 dated 09.12.2015 for the comprehensive phased, mixed use development of land bounded by Harrow View and Headstone Drive (known as Harrow View East)</p>	<p>Approved 06/12/2018</p>
<p>P/2280/19 Non-Material Amendment To Outline Planning Permission P/2165/15 Dated 9.12.15 To Reword Condition 2 To Exclude Enabling Works</p>	<p>Approved 14/06/2019</p>
<p>P/4046/18 Non-material amendment to reserved matters permission P/5079/17 dated 2/2/18 to enable amendments to approved reserved matters plans (FFLs for all blocks, window positions, window and door types, internal layout of homes, Block B gallery access, Block F1 communal entrance, perforated panels to the podium, boundary wall and re-location of existing substation)</p>	<p>Approved 9/07/2019</p>

4.0 CONSULTATION

- 4.1 A Site Notice was erected on 24.09.2019 expiring on 15.10.2019.
- 4.2 Press Notice was advertised in the Harrow Times on the 19.19.2019 expiring on 10.10.2019.
- 4.3 The application was advertised as a major application and an application accompanied with an Environmental Statement.
- 4.4 A total of 1931 notification letters were sent to nearby properties regarding this application.
- 4.5 The public consultation period expired on 17.10.2019
- 4.6 Adjoining Properties

Number of letters Sent	1931
Number of Responses Received	
Number in Support	0
Number of Objections	32
Number of other Representations (neither objecting or supporting)	0

- 4.7 32 objections were received from adjoining residents.
- 4.8 A summary of the responses received along with the Officer comments are set out below:

Social-Economic

- Block of flats are a cause of social problems in an area just beside - Wealdstone with above average crime stats;
- Flats are offered for rental;
- Wealdstone has already presented with social-economic problems – full of crime and drugs;
- Harrow is already over populated.

Officer Comments: *The applicant has engaged the Designing Out Crime Officer (DOCO) for Harrow in developing the proposed development. The DOCO has also been formally consulted on this application and does not raise any objection subject to ensuring appropriate surveillance and safety is incorporated as part of the detailed design. The development as discussed in the appraisal below would create a new neighbourhood to this section of*

Wealdstone and would bring forward new public realm and population to an area which is bleak and disused.

Both national and regional development plans direct new growth to previously developed land and encourage that where suitable densities should be maximised. Further justification is set out under the 'Principle of Development' section of the appraisal.

Character

- Skyline is ruined – how can a proposal from 2 to 18 storeys in height be even considered;
- Will block views and skyline to the surrounding properties – would tower over Goodstone Court;
- When will lessons be learned that high rise developments are archaic and dangerous;
- This is a residential development not an industrial;
- Will end up with an estate type area soon becomes a no go zone – who will occupy these high rise besides the rail tracks – with the pollution from the trains and freight trains;
- Go and see the huge eyesore block of flats in Wembley High Road built with Argos was – its ugly and made the high street dark and depressing;
- Build something in height that the community can thrive in;
- Consider blocks of no higher 6 floors;
- General slum looking development built for short term gain.

Officer Comment: *The impact on the character and townscape has been addressed under 'Character and Appearance' and 'Impact on Protected Views' sections of the appraisal below.*

Overshadowing

- The flats will cast shadow on the opposite side of the tracks near Cecil Road and Tudor Road and make an already dark walkway through the industrial estate even darker.

Officer Comment: *impact on daylighting and overshadowing has been addressed under 'Residential Amenity' section of the appraisal below. This concludes that there would be no impact on any properties adjoining the wider masterplan site in terms of overshadowing.*

Traffic and Highways

- Roads are unable to cope;
- Adding so many dwellings would cause severe road congestion and pollution traffic already a major issue;
- Disappointed to see that flats that are already under construction on the left, close to the lights are being built right up to the pavement, indicating that the roads will not be widened;
- A roundabout at the big junction might have been the sensible

- option to keep traffic moving;
- Already big delays on the bus service due to the congestion;
- Traffic is set to get worse when a further 1,238 dwellings are built – developer should be made to address this issue working closely with the council;
- There is not enough parking provision planned for cars;
- Even if properties sold with no parking spaces – people who have cars will parking on surrounding roads and people who pay for permits will be ticketed;
- Re-modelling of the junction of Harrow View and Headstone Gardens will achieve very little improvement.

Officer Comments: *The impact on the surrounding highway in terms of congestion, parking, transport services and air pollution has been addressed under ‘Traffic, Parking, Access, Servicing and Sustainable Transport’ and ‘Air Quality’ sections of the appraisal below.*

Infrastructure

- Hospitals are unable to cope;
- Emergency service, hospital and health risks – emergency services unable to cope;
- GP practices locally are not accepting patients;
- With no provision for services such as schools, GP surgeries etc the additional burden this will create on already struggling infrastructure;
- Harrow and Wealdstone Station is at capacity at the best of times;
- Struggling refuse collection service;
- Impact on water services; and
- Drainage sewerage is already pretty poor.

Officer Comments: *There is a new health centre and a three form entry primary school that has been secured on the wider masterplan site. In addition, there is community floor space, including new nursery provision that would also be provided on the wider masterplan site.*

Matters relating to waste has been addressed under ‘Character and Appearance of the Area’ of the appraisal. Whilst there would be demand on refuse services, the Council will need to make provision for this demand.

In terms of station capacity this is addressed under ‘Traffic, Parking, Access, Servicing and Sustainable Transport’ of the appraisal below.

Drainage is addressed under ‘Development and Flood Risk’ section of the report below.

Other matters

- Residents were meant to be keeping their cars within the development – why aren't the council monitoring this?
- Persimmon will re-apply for higher flats too – their whole development looks like social housing
- With regards to Persimmon – their workmen still not wearing hard hats

Officer Comments: *these comments refer to the Harrow View West redevelopment site and are not relevant to the current application.*

- Will reduce the price of own flat

Officer Comment: *house values are not a material planning consideration.*

- Can see the chimney from the hill and stands out like a wonderful beacon – a heritage piece – will this be enclosed so that it cannot be seen?

Officer Comments: *The chimney is to be retained and would be refurbished as part of the new energy centre proposals.*

4.9 Statutory and Non Statutory Consultation

4.10 The following consultations have been undertaken:

LBH Environmental Health

Conditions Recommended.

LBH Drainage

With regards to the above, planning application please see below our comments.

1. The **drainage strategy** submitted is satisfactory, however further detailed drainage design in line with our standard drainage requirements attached should be submitted. Please note that the requested drainage details can be conditioned for surface water disposal, foul water disposal, surface water attenuation & storage.
2. A cross section of permeable paving with full details should be submitted (can be conditioned) . The permeable paving maintenance plan submitted is satisfactory.
3. The applicant has proposed Green Roofs , further details are required (can be conditioned) .

4. The applicant should contact Thames Water developer services **by email**: developer.services@thameswater.co.uk or **by phone**: 0800 009 3921 or on Thames Water website www.developerservices.co.uk regarding confirmation of capacity within the public sewerage system to receive the proposed discharge from the new development.

Thames Water approval of discharge level is required for both surface and foul connections.

5. With regard to **Flood Risk Assessment**, our requirements have changed since our new SFRA published in 2018 and Compensatory Flood Storage is required for loss of floodplain in zone 3a and 3b. Previously it was only required for loss of functional floodplain (zone 3b). The site has localised flooding that should be addressed in the FRA. Compensation for all ground levels raised or buildings constructed in zone 3a and 3b should be provided on level for level and volume for volume basis by gradually lowering ground levels, with flood water flowing freely out of the lowered area when flooding recedes.

The CFS should be positioned outside of (and contiguous with) the flood zone wherever possible.

The minimum volume of CFS to be provided will equate to the volume of flood water displaced by the proposed development.

Please note that CFS should be designed for a worst case scenario therefore the highest flood depth should be considered. i.e. the upper limit for each depth banding on the available flood map data.

Details required (cannot be conditioned):

The applicant should submit the following details:

- location of proposed CFS on plan
- calculations for volume of compensation storage required
- cross section of the proposed compensatory flood storage with levels of the existing and proposed / lowered ground level in relation to the finish floor level.

We would suggest buying our flood depth map for the area as our maps are more detailed due to higher resolution and hence more clear.

6. FFL of new buildings should be raised 300mm above flood level. Please request the applicant to revise the submitted drawings.

LBH Highways

First Consultation Response

We have reviewed the Transport assessment and comment as follows;

3.22 – Extra care cycle parking – ideally residents should also be given the opportunity to have cycles should they wish to. Assuming that all of the future residents would not be able to cycle isn't in the spirit of an extra care facility as the intention is to allow residents to live independently but with support as and when required; this means that some quite able residents but with declining health needs are likely to reside in this type of accommodation. This development is meant to promote sustainable travel to all.

3.25 – Public transport network – has capacity at the stations been considered? Our own experience at Harrow and Wealdstone station has demonstrated that in the morning peak in particular, platform 6 is often overwhelmed with people and when the trains arrive, there is very little room for boarding as few people alight. At what point is the demand considered unsafe? It is true that alternative services have more capacity however there is significant demand for the faster, shorter journey on the national rail services. The TA looks at the potential impact of this proposal however in reality, there is an existing capacity issue at peak times and this is only set to get worse with the introduction of more residential developments that rely on the public using sustainable modes of travel as their primary way of getting about. It is essential that an assessment of rail and Tube capacity is undertaken.

Are first class carriages in use at peak times and has it been considered by operators given the demand on their services at these times whether first class should be suspended to allow more passengers to board in order to avoid unsafe situations on platforms? All boroughs are trying to encourage travel by public transport however when the resulting capacity issues are not being recognised and mitigated, this presents a bit of a problem and will only lead to people travelling a different, more convenient way (possibly car).

Table 4.2: Route 1 – the findings are welcomed and where possible suggestions will be considered further when the junction layout is reviewed in the future.

Table 4.3: Route 2 – Harrow & Wealdstone station is outside of our control. There are suggestions for improvement that really ought to be implemented particularly as this proposal along with others will see an increase in users of this station. If the existing s106 obligations do not currently require the applicant to contribute to improvements, it would seem that as the proposal site will be

generating a significant number of additional journeys to and from this site, it would be appropriate to secure funds to implement some of the improvements suggested eg. seating or a cycle hub.

4.16: Route 3 – Comments in relation to poor surfacing and drainage have been noted. Cecil Road is not shown on the programme for carriageway resurfacing this financial year however if funds allow, improvements will be incorporated into the proposals for the Kenton to Harrow Weald cycle way.

Table 4.4: Route 4 – Improvements to the pedestrian environment can be addressed through the agreed s106 contributions received and yet to be received that are to be used towards the cost of improvements for the pedestrian and cycle route between the site and Wealdstone Town Centre and more specifically a further contribution to make improvements to the underpass on Headstone Drive.

Table 4.5: Route 5 – noted

Table 4.6 Route 6 – as route 3

Table 4.7: Route 7 – noted

Table 4.8: Route 8 – the area between Cecil Road and High Street is the subject of a public realm scheme and has been revised since this study was undertaken meaning that some of these issues may have already been addressed.

Table 4.9: Route 9 – noted.

Where possible, the improvements identified in the ATZ assessment will be implemented using agreed s106 contributions or CIL funding.

Appendix E – swept paths –The road widths on the unadopted sections of highway look very narrow at some points eg. residential street C outside D 4.1 and the play area. These should ideally be increased to a minimum of 4.8m in width and we would advise that a road safety audit should be carried out now as it may be too late to change the design later in the process.

The outline CLP is fine and a pre-commencement condition for a detailed CLP should be applied.

The Travel Plans will be reviewed separately by our Travel Planner.

Second Consultation Response Following Applicants Response

We have nothing further to add at this stage as all of our comments have been addressed and we await the RSA for the internal roads.

Third Consultation Response following submission of the road safety audit.

As they have accepted the recommendations of the RSA we have no further comment.

LBH Planning Policy

No Objection

Full comments have been incorporated noted in the appraisal below

LBH Design

No Objection

This is a well-designed residential development which will make a good place to live in Harrow. It was presented at four design review panels between November 2018 and June 2019. The Panel (DRP) support the proposal and judge it to be a high-quality scheme. Both the DRP and the Harrow urban design advisor made a number of recommendations for improvements throughout the process, and the design team have addressed all major points in this application. The decision to revisit the original masterplan through this detailed application is welcomed, and the site as a whole will be improved by the proposed revisions to the masterplan in this application. Four architects were involved in the application, and their varied approach to the design of individual buildings helps to build a strong identity for the site.

Full detailed comments are incorporated in the appraisal below.

LBH Conservation Officer

No Objection

LBH Tree Officer

No comments received

LBH Education

No comments received

LBH Landscape Architects

No objection subject to appropriate landscape conditions.

LBH Waste Officer

No comments received

LBH Housing Enabling Manager

First Consultation Response

40% affordable housing by habitable room and 60/40 split in favour of affordable rent is welcomed.

For affordable rent, the bed size mix does not comply with our target mix (current mix detailed below). 25% (by unit) 1 beds (53 units) is too high (target is 10%). 104 x 2 beds (49%) is welcomed but the majority of these (66 units) are 2b3p units which we do not require. 2b4p units are our preferred person occupancy for flexibility of allocations. 57 x 3 beds (27%) again does not meet our target bed size mix of 40% and these are all 3b4p which we do not require – 3b5p is our strong preference.

10% wheelchair provision met in affordable rent and intermediate tenure but the wheelchair provision in the affordable rented tenure is all 2b3p – would prefer some 2b4p and 3 bed wheelchair adapted units for flexibility of allocations.

We request measured plans of the affordable rent and extra care wheelchair adapted units please, for comment as to internal design.

London Affordable Rent levels are correct for rented units and extra care units.

In terms of affordability for the shared ownership and DMS units, according to my calculations (spreadsheets attached) 1 beds are fine for both tenures, coming in under the borough (£49k) and mayoral (£56.2k) average household income benchmark levels, but the 2 beds for both tenures are over both benchmark averages – particularly over the borough average – so are not considered to be affordable. 2 bed DMS units require a higher household income than 2 bed shared ownership units, although they are smaller units. A double income argument for 2 beds would help in some circumstances but not all i.e family occupancy where only one adult is working .

The attached spreadsheet methodology (created by David Hughes) returns a similar income requirement as Carter Jonas for the DMS units but a much lower one for the shared ownership (CJ's being £53,750 and £65,000). Earlier affordability info provided by the applicant had exactly the same average income figures for shared ownership but higher sales values so maybe they have copied the average incomes across rather than recalculating the average incomes to account for lower sales values in the affordable housing statement.

Extra care provision is welcomed – comments awaited from ASC on this but my comments are:

Assisted bathrooms- we heard mixed things about these, in terms of them sometimes being a loss of space if they don't get used. But there seems to be flexibility for alternative use as a communal tea room which is likely to be a better option, as we do not think the relationship between the assisted bathroom and the communal walkway is acceptable.

The care and housing management functions are two separate functions. There isn't adequate office provision for both the housing management and the care functions – although the care staff have overnight facilities there is no office for care staff – would be required for holding confidential meetings etc and for the Care Manager. This is a concern as a care scheme we visited had to retrofit an office and lose a room.

Balconies off bedrooms are not ideal.

Second Consultation Response – following amended plans

1 beds have been decreased – could still go down further ideally but it's slightly better than it was. 2b3p has drastically reduced - pleased to see predominantly 2b4p units – Positive that the 3b4p have become 3b5p units although 3 bed wheelchair units are also in demand so some wheelchair provision in the 3 bed units would be needed to meet demand. Housing Needs would accept 3b4p wheelchair units if need be in order to secure some 3b wheelchair units. 1 bed wheelchair units are not a priority need.

LBH Adult Services

1. Integrated provider

It is noted that the proposal is for an integrated provider (one registered provider for housing and social care provision). This leaves the LA statutorily liable for a service not commissioned by them, a service that has not been through the Council's procurement process ensuring quality provision or agreed KPI's and performance monitoring processes.

2. S106

Legal will be liaising with Planning regarding this. Our main concerns are the exclusion of Extra Care under the nomination rights for affordable housing and the Service Charge.

3. Open Walkways

There is still concern that open walkways will pose a safeguarding risk to vulnerable people residing within Extra Care with mental

health issues including dementia. Decorative screening could be used to reduce risk.

4. Balconies

Balconies all lead off the bedroom rather than the living room. This is likely to reduce access to balconies and reduce natural airflow through the living room which is where the majority of the time will be spent.

5. Office space

The care and housing management functions are two separate functions. There is inadequate office provision for both the housing management and the care functions – although the care staff have overnight facilities there is no office for care staff – would be required for holding confidential meetings etc. and for the Care Manager.

6. Assisted Bathrooms

Assisted bathrooms are placed on open walkways which will be unusable during colder months as residents are vulnerable people and are not conducive to their dignity.

LBH Economic Development

There is already a s106 agreement linked to the initial Land Securities application p/3405/11 which covered both Harrow View West and Harrow View East sites.

It is essential that s106 contributions agreed as part of the outline application are carried through into subsequent applications as the cost of the s106 contributions should fall across all phases and sites as appropriate.

The initial s106 agreement included the following contributions that relate to Economic Development:

"Construction Training Contribution" means the sum of £60,000 (sixty thousand pounds) per annum over a five year period (up to a total of £300,000) to be paid by the Owner to the Council and applied by the Council towards local construction training initiatives in the borough

"Economic Development Contribution" means the sum of £100,000 (one hundred thousand pounds) a year for three years (to a total of £300,000) to be paid by the Owner to the Council and applied by the Council to fund the implementation of the Economic Development Strategy. **This has now been revised to £249,540**

"Economic Development Strategy" means a strategy to be jointly agreed by the Council and the Owner setting out initiatives to support business inward investment in the employment area within the Development

"Incubation Space" means 500sqm of floorspace provided for

business use

"Town Centre Contribution" means the sum of £300,000 (three hundred thousand pounds) to be paid by the Owner to the Council in five equal instalments of £60,000 and applied by the Council towards management initiatives for the Town Centre. **This has now been revised to £280,000**

Please liaise with David Hughes to ensure that these total s106 amounts (or any revised s106 amounts) are carried forward into the applications for each phase as they come forward and individual s106 agreements are put in place.

Construction Training Contribution

Specifically, as part of any s106 agreements, we will request a pro-rata financial contribution towards the £300,000 "Construction Training Contribution" and the requirement for a related Employment & Training Plan to be submitted and agreed by the Council before start on site.

Economic Development Strategy

The actions set out in the agreed EDS need to be taken forward as the employment phases of the Harrow View development come forward.

- 4.11 The comments of the consultees are addressed within the relevant sections of the assessment.

External Consultation

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

GLA (including TfL comments)

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 Area Action Plan.

Affordable Housing: The provision of 40% affordable housing (with grant, by habitable room) is strongly supported. An early stage viability review must be secured as part of the Section 106 agreement in accordance with Policy H6 of the draft London Plan and the Affordable Housing and Viability SPG, and affordability of various housing products must be confirmed and secured.

Design: The broad layout and massing provides positive enhancements to the permeability of the site. The new public square and a series of well-defined street and building typologies add to the

rich character of the development. No strategic design concerns are raised.

Transport: The transport assessment should clarify the secured mitigation measures and measures required to mitigate impacts of the proposal. The impact of additional trips on station capacity and train line loadings should be assessed. Further detail is required to confirm cycle parking standards are achieved. Improvements to the routes to nearby station should be secured.

Outstanding issues relating to Agent of Change, play space, energy, water, urban greening and transport need to be addressed.

Recommendation: That Harrow Council be advised that the application does not yet comply with the London Plan and draft London Plan for the reasons set out in paragraph 78 of this report; but that possible remedies set out in that paragraph could address these deficiencies.

Officer comments: *the above is noted. Full Stage 1 is appended to this report and each issue has been addressed in the Officer's appraisal below.*

Thames Water

Water Comments

No water comments

Supplementary Comments

Thames Water do not have capacity for these plots or the wider Kodak Site development. Modelling is being undertaken by Thames Water and the phasing of the Kodak Site shows there will be no occupation until September 2022. Thames Waters current program indicates that we will have completed reinforcement works for the whole of the Kodak Development site by the end of December 2021. As a result of this Thames Water do not raise any concerns. If the phasing plan we have been provided was to be incorrect or to change then Thames Water would need to be contacted and concerns would be raised as our program of works has been planned out and we only have capacity once the works are completed.

Officer Comment: *Noted. An informative would be attached advising the applicant of the above.*

Health and Safety Executive

No objection

TfL Infrastructure

No objection

Design Out Crime Officer

- See no reason why this proposed development would not achieve a Secured By Design Accreditation.
- Only concern is the access control for the podium gardens, these gardens must be under resident control, to give them sense of territoriality and reduce the risk of ASB and associated crimes. Therefore fob controlled gating is required for these development.
- The open gated policy has been trailed by Harrow Council in other developments, and the result has been that non-residence have abused the open gate policy.
- Would therefore seek to have a planning condition where this development must achieve Secured by Design accreditation

Officer Comment: *The proposed podium design has been through various discussions with DRP panel members and the Urban Design Officer and whilst the DOCO concerns are noted, DRP panel members feel that the inclusion of permanent gates would be loss of opportunity for social cohesion and allowing permeability through the site. By way of agreeing an 'in the middle' approach, it has been agreed that in the first instance that gates should be provided, but that these remain open during the day and locked in the evenings. Should after a suitable trial period, it is established that the unrestricted access is causing nuisance, then the applicant shall apply to have secure access at all times. Appropriate conditions are recommended.*

Historic England (GLAAS)

No archaeological requirement.

Historic England (Listed Buildings)

No objection

Network Rail

The applicant should submit an asset protection initial enquiry form.

Agreement to the following where relevant is required:

- Piling
- Crane, tower crane working

Network Rails is aware that residents of developments adjacent to or close proximity to, or near to the existing operational railway have in the past discovered issues upon occupation of dwellings with noise and vibration. It is therefore a matter for the developer and the council via mitigation measures and conditions to ensure that any existing noise and vibration, and the potential for any future noise

and vibration are mitigated appropriately prior to construction.

Officer Comment: *The impact from adjacent railway lines and trains in terms of noise and vibration has been considered the applicant's ES and this has concluded that there would be no adverse impact subject to appropriate mitigations. Appropriate conditions will be attached in respect of building fabric design.*

Natural England

No objection

Brent Council

No objection

NHS

Under the s.106 agreement a new health facility is to be provided on the site and we are in discussion with the developers in relation to this.

The only area of concern with regards to the application is the 60 unit care facility. Will this appoint its own clinicians or will practices in the area be expected to support this facility.

Extra Care facilities put local GP practices under significant pressure as they are called in to attend frequently which has an overall impact on the provision of care for all registered patients.

Officer Comment: *There is a new health centre secured on the wider masterplan site, but this is not secured via a section 106 obligation. The proposed extra care homes is designed to be as independent as possible for future residents and will fall within use class C3 (dwellings) as opposed to traditional care homes under use class C2, which normally houses residents that have higher dependency needs. The care home final operator has not been determined as yet. However, the provision of this type of accommodation is highly supported within the development plan.*

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 was updated in February 2019.
- 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 originally published in draft form in December 2017 and subject to Examination in Public (EiP) with the Panel's report published in October 2019. The Mayor of London has considered these recommendations, and has either accepted them or where not, provided justification as to why accepting them would not be appropriate. The Mayor has now submitted to the Secretary of State an 'Intend to Publish' version of The Plan. It is for the Secretary of State to determine whether he agrees with the revised Plan and it ought to be published in that form.
- 5.9 The Draft London Plan is a material planning consideration that holds significant weight in determining planning applications, with relevant policies referenced within the report below.

6.0 ASSESSMENT

6.1 The main issues are;

- Principle of the Development/ Provision of Out of Town Retail Use
- Regeneration
- Environmental Impact Assessment
- Heritage and 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
- 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
- Statement of Community Engagement
- S.106 Obligations and Infrastructure

6.2 Principle of Development

- 6.2.1 The relevant policies are:
NPPF
The London Plan: 2.13, 3.4 and 4.7B
Harrow Development Management Local Policies: DM35
Harrow and Wealdstone Area Action Plan: AAP3, AAP4 and AAP17
Draft London Plan: GG2, SD7 and H1
- 6.2.2 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.
- 6.2.3 The Heart of Harrow is 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.
- 6.2.4 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. The anticipated 5,000 new homes is reflected in the updated Opportunity Area designation in the draft New London Plan.
- 6.2.5 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 HVE Phase III is supported.
- 6.2.6 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. The site allocation consolidates designated strategic industrial land (SIL) to the northern and eastern parts of the former factory site (identified as development plots C2 and D3 on the approved masterplan) and to the southern western corner of the site where the former Kodak administrative building remains (located on the southern half of development plot B1).

- 6.2.7 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.
- 6.2.8 This application relates to development plots D1, D2, D4, D5 and D6 located within Development Zone D of the HVE masterplan and is referred to as HVE Phase III (as per the phasing strategy approved pursuant to condition 6 of the outline permission). As way of background, Phase 0 related to the demolition works to approximately half of the former Factory site. Phase I relates to development plots D7 and D8 and Phase II relates to the remaining demolition works on the Factory site and enabling works.
- 6.2.9 As noted from the history section above, the applicant has already secured reserved matters permission in relation to plot D7 (P/5079/17), which will deliver 460 new homes within Development Zone D of the HVE masterplan site. The approved parameters are listed above under the site description section of this report and include a parameter of maximum of 800 new homes for this specific Zone. Having secured 460 new homes, this leaves a balance of 340 on the remaining plots within Development Zone D. This proposal would deliver a further 886 new homes in addition to the remaining balance of 340 units, bringing the overall total under this current application to 1,226 new homes.
- NB: Since the submission of the original application and following detailed discussions with the Council's Housing Enabling Manager, in relation to the bed size mix in respect of the affordable rent tenure, the number of units has been reduced from the originally proposed 1,238 to 1,226. This change, other than improvements to the affordable housing tenure has no impact upon other material considerations set out under this appraisal. As the changes sought to reduce the number of units does not materially change the development being proposed, it is not considered necessary to undertake any further re-consultation on this application.***
- 6.2.10 In addition to the new homes already secured under P/5079/19, the approved matters also included the substantial proportion of the green link that cuts through the masterplan site and links to the green link approved across Harrow View on the Persimmon redevelopment site (known as Harrow View West). A new planning permission was also granted under P/5244/17 on plot D8 for new energy centre and community floorspace. In addition to this, the applicant has also secured reserved matters permission for development plots B1 (northern half only) and C1 which would deliver a further 350 new homes and community and leisure floorspace.

- 6.2.11 The applicant has engaged with Officers at an early stage to identify where further intensification of the approved masterplan could be supported. This was achieved through detailed pre-application meetings with both the LPA and the GLA, together with having the scheme independently reviewed by the Design Review Panel. This approach is consistent with the aspirations of paragraphs 39 to 42 of the National Planning Policy Framework which seeks to encourage pre-application engagement and front loading of applications.
- 6.2.12 It is through these pre-applications discussions that it was identified that being located centrally within the overall masterplan site and sufficiently sited away from existing neighbouring properties, that development plots D1, D2, D4, D5 and D6 could support further intensification by way of increased housing supply through increasing the massing beyond the approved parameters.
- 6.2.13 Whilst it is acknowledged that concerns have been raised with regards to the increased heights of the buildings and the subsequent increase in density, such an increase 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. Officers acknowledged that there is only an infinite supply of land available to deliver high density schemes in order to meet current housing targets and given that these targets are set to increase further through the adoption of the new London Plan, the LPA is required to consider where suitable to maximum development potential on brownfield land, in particular on key strategic sites. With the former Kodak Factory site being the largest designated strategic site within the AAP and given its sustainable location close to local transport infrastructure and proximity to Wealdstone District Centre, further optimisation of the site would be considered appropriate and welcomed.

Provision of Out-of-Centre Retail Use

- 6.2.14 The relevant policies are:
NPPF: Chapter 7
The London Plan: 4.7B
Harrow Development Management Local Policies: DM35
Harrow and Wealdstone Area Action Plan: AAP17
Draft London Plan policies: SD7
- 6.2.15 The proposal would include 362sqm (GIA) of café/ restaurant spaces (Use Class A3) and 728sqm (GIA) of flexible active uses (Use Classes A1, A2, B1(a) and D1). The total quantum of non-residential floor space would be 1100sqm.
- 6.2.16 Paragraph 86 of the NPPF requires LPA's to apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Paragraph 89 goes on to state that when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, LPA's should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (in the case if there is no locally set threshold, the default

threshold is 2,500sqm). This is consistent with policies 4.7B of the London Plan, DM35 of the DMP, AAP17 of the AAP and SD7 of the Draft London Plan. Harrow's threshold is set under policy DM35 of the DMP at 2,500sqm.

- 6.2.17 The site allocation for Kodak and Zoom Leisure (Site 2 (Chapter 5 of the AAP)) supports land uses that fall within Use Classes A1, A2, A3, A4, A5, D1 and D2 along with leading land use falling within Use Classes B1, B2 and B8. The original outline permission granted under P/3405/11 has already accepted the principle of retail and commercial uses for up to a floor area of 5,000sqm and this quantum is set out under the site description to Site 2 allocation within the AAP. The subsequent outline planning permission granted under P/2165/15, in light of the changes to national, regional and local development plan policies was required to be supported with a full retail sequential test and impact assessment report that assessed the impact of the retail provision on the existing Wealdstone District Centre and the local neighbourhood parade located on Headstone Drive. The impact assessment on the Wealdstone District Centre and the local neighbourhood parade was found to be acceptable under P/2165/15, which included the quantum of up to 2,000sqm for food store (Use Class A1) and up to 2,000sqm of flexible active uses which included B1a and D1 Use Classes.
- 6.2.18 The total quantum of 1100sqm of commercial floor space proposed under this application falls below the threshold required for an impact assessment. Furthermore, since the grant of outline planning permission under P/2165/15, the detailed reserved matters submitted under P/4610/17 for Development Zone A, secured a much lower quantum of flexible active uses at a total floor area of 738sqm (Use Classes B1a, A1-A5 and D1) and a food store with a floor area of 522sqm.
- 6.2.19 Having regard to the fact that the site allocation supports the associated non-residential land uses and the relatively small scale floor area proposed on the application site, and that already secured on the wider masterplan site, it is considered that proposals would not have a detrimental impact upon the functioning and vitality of the nearby Wealdstone District Centre and the local neighbourhood parade. The small units would be dispersed across the site and located at key strategic routes within the masterplan site and would not result in a concentration of retail uses that would individually, or in conjunction with the proposed food store located within Zone A amount to any unacceptable impact on Wealdstone District Centre and the local neighbourhood parade. Furthermore, Officers consider that given the quantum of population that would reside on this masterplan site once complete, the proposed flexible uses would serve as a place marking function alongside providing local employment opportunities. As stated above, the flexible uses would be located along key routes within the masterplan site and would help activate these routes and therefore can be supported in principle. This is also supported by the Mayor in his Stage 1 response.
- 6.2.20 It is acknowledged that the Mayor in his Stage 1 response has required that a quantum of the flexible active floorspace should secure a portion of the commercial floorspace as a genuine community (Use Class D1) land use in line with policy 3.16 of London Plan and policies D1A and S1 of the Draft London Plan. However, Officers consider that as a quantum of D1 community floor space has

been secured through the section 106 obligation on the wider masterplan site (P/2165/15), and the applicant has already secured detailed reserved matter permission (P/3892/18) for the community floor space and has begun discussions with LPA on how this will be delivered and transferred to an appropriate community group, it is not considered necessary to secure further D1 floor space under this application either through condition or legal agreement. Furthermore, flexible community floor space (Use Classes D1/ D2) has also been secured under planning permission that was granted for the new energy centre located on Plot D8 under application P/5244/17.

- 6.2.21 In view of the above and as demonstrated further in this report, it is considered that the proposal would meet aspirations of Chapter 9, paragraphs 117, 118 and 124 of the NPPF, policies 2.13, 3.4, 4.7B of The London Plan (2016), policies GG2, SD7 and H1 of the draft London Plan (2019), policies CS1 and CS2 of the Harrow Core Strategy (2012), policy DM35 of the Development Management Plan Local Policies (2013) and policies AAP3, AAP4, AAP5 and AAP17 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 Environmental Impact Assessment

- 6.4.1 The requirement of the Environmental Impact Assessment (EIA) Regulations 2017 is based on the likelihood of significant environmental effects arising from a new development and are divided into Schedule 1 and Schedule 2 applications under the EIA Regulations. Schedule 1 would normally constitute developments that would have significant effects on the environment such as major chemical projects or ground and air transport infrastructure. Schedule 2 consists of other forms of developments that are dealt with under a threshold approach. The proposals falls under Schedule 2, Part 10 (b) relating to *Urban Development Projects* at the development includes more than 150 dwellings. Given the quantum of development proposed together with the cumulative impacts of extant permissions, the development is considered to be EIA development.

- 6.4.2 The applicant has undertaken an EIA to assess the likely significant effects of the proposed development. The accompanying Environmental Statement (ES) describes the likely significant environmental and socio-economic effects of the proposed development both during the construction works and on completion and operation of the development, and the results of such are set out in the ES.
- 6.4.3 The technical topics considered within the ES include:
- Socio Economics;
 - Traffic and Transport;
 - Air Quality;
 - Noise and Vibration;
 - Wind Microclimate;
 - Daylight, Sunlight and Overshadowing;
 - Heritage, Townscape and Visual Impact Assessment; and
 - Greenhouse Gas Emissions.
- 6.4.4 With the exception of socio-economics, the topics above are addressed under various sections of the appraisal below and will capture the findings in the ES. The ES also takes into consideration the cumulative impact of the development when considered with other projects both in the context of the HVE masterplan site itself (Tier 1) and wider projects located within 1km radius of the site (Tier 2). The ES for certain topics areas has taken consideration of much wider effects.
- 6.4.5 As demonstrated in the appraisal below and as summarised in the non-technical summary of the ES, the proposed development along with the appropriate mitigations to be secured by appropriate conditions or by legal agreement would not result any significant detrimental impacts upon the environment or have any adverse socio-economic effects. Furthermore, the wider masterplan (P/2165/15) was supported with a full Environmental Statement and supplemental to this a number of conditions have been imposed under that 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.

Socio Economic

- 6.4.6 The ES assesses the impacts of employment at construction phase and at completed development phase. The scheme will generate additional employment opportunities during the construction phase and whilst this is likely to be negligible in the long term, it is nonetheless seen as a benefit in the short term. Once completed, the development site is likely to create approximately 31-91 jobs which the ES concludes would have a minor beneficial impact at local level.
- 6.4.7 In terms of demand on education, based on the child yield arising from this development, it is likely that there would be a demand for 95 primary school places and 40 spaces for secondary education. True baseline data shows that there is limited existing surplus capacity within existing primary schools and therefore there would be direct impact upon primary school education. However, there is already social infrastructure secured by way of a 3FE primary school located on the wider masterplan site, which would be of sufficient capacity to accommodate the additional demand on primary school places. In this regard, there would be no

adverse impact. In terms of secondary education, there is some surplus capacity available within LBH secondary schools; therefore the impacts on secondary school provision will be negligible.

- 6.4.8 In terms of health, the ES states that the proposed development would require an equivalent of 1.2 full-time GP. There is limited surplus capacity within the locality and therefore the development could have a minor impact at local level. However, there is already a health centre secured on the wider masterplan site which would mitigate against any impact on existing services.
- 6.4.9 Overall, based on the above, the development is not likely to give rise to significant environmental impacts.

6.5 Heritage and Impact on Protected Views

- 6.5.1 The relevant policies are:
NPPF: Chapters 12 and 16
London Plan: 7.4, 7.6, 7.7 and 7.8
Harrow Development Management Local Policies: DM1, DM3 and DM7
Harrow and Wealdstone Area Action Plan: AAP3, AAP6 and AAP8
Draft London Plan: D1
- 6.5.2 The applicant has submitted a Heritage, Townscape and Visual Impact Assessment (HTVIA), which forms one of the chapters within the ES.
- 6.5.3 The subject site is not located within a Conservation Area and does not contain any statutory listed buildings. There is a locally listed underground Air Ministry Citadel, known as Station Z located immediately to the north of the subject site, which consists of a basement and sub-basement that can be accessed via a prefabricated metal entrance hut. The basement level is roofed over by three and a half feet of reinforced concrete. The above ground structures were demolished in 1996.
- 6.5.4 Approximately 600m north-west of the subject site is the grounds of Headstone Manor which comprises the statutorily listed Headstone Manor (Grade I), Great Barn (Grade II), Small Barn (Grade II), the Granary (Grade II) and the Scheduled Monument moat of Headstone Manor.
- 6.5.5 The site is not located within any Strategic views as determined by the adopted London View Management Framework (2012).
- 6.5.6 The site lies partially within the Protected Views Restricted Corridor of Old Redding (red cone) and lies fully within the setting of this protected view (yellow cone). 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.

- 6.5.7 Within the red cone of the view corridor, 110m AOD is the maximum building height allowed in policy terms unless world class architecture is proposed. Parts of Plot D1 fall within the red cone, however the highest points of Plot D1 are 105 AOD and therefore they do not exceed the threshold of 110m AOD set by policy DM3.
- 6.5.8 The site falls within the wider yellow cone, however it is considered that the development would not compromise views of Harrow on the Hill or St Mary's Church as the site is set much lower than these features and as such there would be no impact upon protected views.
- 6.5.9 In terms of the impact upon heritage assets, the impact upon the listed buildings located on Headstone Manor grounds will not be significant, given its distance and orientation from the subject site. The HTVIA shows that there might be some glimpsed views of the proposed development from the north-east corner gardens, but the Manor House itself is not discernible within its tightly defined setting within the trees. As such, there would be not impact upon the setting of these listed buildings. In terms of the locally listed underground Air Ministry Citadel, given that its structure and interest and value is contained below ground, it is considered that there would be no impact on this structure. The HTVIA also gives consideration on the impact and views from other heritage assets within a 1km radius of the development site and it has been demonstrated through this assessment that there would be no impact upon the setting of these other statutory and locally listed buildings.
- 6.5.10 In terms of townscape and views, the HTVIA demonstrates that there would be inter-visibility of the proposed development from surrounding areas at certain vantage point at street level along Harrow View, Headstone Drive, Pinner Park Gardens and Cecil Road. In terms of the distant views, from Pinner Park Farm, Headstone Manor Recreation Ground, Pinner New Cemetery, Headstone Lane Station Bridge and Harrow and Wealdstone Station Bridge, the proposed development will be perceptible in the backdrop views from these locations but this will be at a considerable distance and therefore the impact would be low. Furthermore the high quality architecture that would replace the former factory buildings would be of some benefit to the townscape and views.
- 6.5.11 Whilst noting that there will be a change within the townscape views, the changes to the landscape panorama associated with the form of development would not 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. Based on the above, the proposal would not give rise to any conflict with the policies listed above.

6.6 Character and Appearance of the Area

6.6.1 The relevant policies are:

NPPF: Chapter 12

London Plan: 7.4., 7.5, 7.6, 7.7 and 7.13

Harrow Development Management Local Policies: DM1, DM22, DM23 and DM45

Harrow and Wealdstone Area Action Plan: AAP3, AAP4 and AAP6

Draft London Plan: D1, D3 and D11

6.6.2 The surrounding area is mixed in character. To the south and west of the wider masterplan site the area is characterised by interwar residential development, largely two storeys, but interspersed with two to four storey high flatted developments. To the east of the site, the character is defined by commercial and industrial development. Buildings are low rise and range from one to three storeys in height. Further east and past the railway lines, the character is defined by Victorian and Edwardian residential terraces, two storeys high.

6.6.3 As noted in above section, within the wider character setting, the grounds of Headstone Manor with its number of Grade I and Grade II listed buildings and Scheduled Monument moat are located approximately 600m from the subject site.

6.6.4 The subject site is located within the wider Harrow View East masterplan site which until recently, was occupied by disused industrial buildings associated with its former by Kodak. The buildings and the chimney formed landmarks within the townscape due to their contrasting height and form. The former sports grounds is currently being redeveloped pursuant planning permission granted under outline application P/3405/11. The main factory site is also being redeveloped pursuant to outline permission granted under outline application P/2165/15.

6.6.5 This scheme has been extensively developed through detailed pre-application discussions held with Officers, the Urban Design Officer and external design consultants. It was presented at four design review panels between November 2018 and June 2019. The Panel (DRP) support the proposal and judge it to be a high-quality scheme. Both the DRP and the Harrow urban design advisor made a number of recommendations for improvements throughout the process, and the design team have addressed all major points in this application.

6.6.6 The proposed development relating to Plots D1, D2, D4, D5 and D6 form part of the wide Harrow View East masterplan site. The intention is to integrate the development of these plots with the other plots as part of the comprehensive regeneration of the Harrow View East site.

6.6.7 The original outline permission under P/2165/15 set height parameters for the entire masterplan plan site as follows:

Plot D1 – 10 storeys

Plot D2 – 8 storeys

Plot D4 – 5 to 8 storeys

Plot D5 – 5 to 8 Storeys

Plot D6 – 6 to 10 storeys

Buildings in terms of their massing would generally be six to eight storeys in height and would be punctuated by landmark towers that help with way finding and legibility of the site. The proposal would include eleven, fourteen and eighteen storey towers which mark the new neighbourhood square and end of the green link. Four architects were involved in the application, and their varied approach to the design of individual buildings helps to build a strong identity for the site. Whilst it is noted that the massing of the plots would now exceed the parameters set by the previous masterplan, however as discussed in detail further below, the massing has been designed to respond to the new character context and help with wayfinding through the site through incorporating landmark buildings as key markers through the site.

6.6.8 The taller buildings are located centrally within the overall masterplan site and will therefore not impact on the surrounding context, albeit that, in distant views, as noted above, the development would be prominent and visible. However, as the views impact assessment has demonstrated that the massing and punctuation of the taller elements in the townscape will add to the changing townscape of Harrow skyline and given the lower topography of the subject site the proposed massing would relate appropriately to the wider context of the surrounding area. The taller elements would help to break the uniformity of the mid-rise buildings, helping to define the key areas along the masterplan site both in terms of the subject site and the wider masterplan 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.

6.6.9 It is intended to create a sub-neighbourhood character within the wider masterplan site to improve connectivity through the site and enhance the overall character and appearance, pattern of development and layout of the masterplan site. The proposal will establish the following main character areas that are imbedded within the masterplan:

Neighbourhood Square – this will provide a main civic presence of the scheme and a focal point. The square will be linked to all streets and will largely comprise non-residential uses at ground level. The buildings vary in character and appearance and include a fourteen storey tall building terminating the view down Avenue South.

Avenue North and South – this will provide the main connecting route through the site and connect to the wider masterplan site. Buildings range in height and are activated at ground level with generous entrance lobbies or double height lobbies and individual entrances. Avenue South would comprise of taller buildings along the northern side and medium rise buildings to the southern side. Buildings along Avenue North would be medium rise and domestic in character, but designed to respond to the employment land located opposite (Plot D3), by ensuring adequate buffer zones and through the arrangement of internal habitable rooms.

Park Edge – this is part of the site adjacent to the new public park being delivered under Plots D7 and C1. The eighteen storey building will mark the northern end of this park.

Residential Streets – these would be located between the main character areas. These streets are shared surfaces, with opportunity for play, trees and planting. On-street car parking will be integrated into the public realm which would be softened by the use of soft landscaping. Building would be medium rise and domestic scale with the streets fronted by communal and individual entrances.

- 6.6.10 In terms of character, it is considered that the above sub-character areas would help to create a sense of place and legibility through the site and in context of the wider masterplan site.
- 6.6.11 In assessing the layout, the proposal addresses a number of issues in the original masterplan, particularly the hierarchy and legibility of routes. The primary route, which was previously problematic, has been relocated to have active frontage on both sides. East-west routes have been improved, strengthening connections down to the green link. The creation of a new neighbourhood square at the heart of this phase is also a positive move, creating a new focus for the community.
- 6.6.12 The massing, layout, design and appearance of each individual plot is assessed in detail below.

Plot D1

- 6.6.13 This plot is located in the south-east corner of the site and is bounded by Waverley Industrial Estate to the east which is situated on a lower site level than the subject site. The boundary features a retaining wall separating this industrial estate and the subject site. This plot fronts Avenue South to the west and Plot A located within Development Zone A of the wider masterplan site. This plot has been designed by Makower Architects.
- 6.6.14 Buildings range from eight to fifteen storeys in height linked with two storey duplexes in between the taller elements and linked by a podium garden with parking and servicing below this. The massing of the three slender towers relates to the approved scheme on Plot A1 (Zone A) and the 'L' shaped northern most building would relate to the scale of massing with the wider masterplan site along Avenue North. The massing also ensures that the Kodak Chimney remains the tallest element in the masterplan. The massing has been designed to ensure that the open spaces achieve good levels of sunlight.
- 6.6.15 The building layout along Avenue South would be stepped to create pocket spaces. The step in the buildings will provide opportunity to create lobby entrances at the corners of the three taller towers that are clearly identifiable and visible. The layout would ensure that there is a buffer zone of at least 1.5m retained between the development and the boundary with Waverley Industrial Estate and this boundary would be further bounded by a solid edge to shield against this neighbouring industrial estate, the details of which would be conditioned as part of the landscape works. The layout of buildings D1.4 and D1.5 within this plot would be slightly angled to soften the journey along this route. The corner of building

D1.4 fronting the neighbourhood square would comprise a double height commercial unit. The ground floor duplex apartments would have front gardens ranging from 1.5m to 3m in depth to provide adequate defensible space. The podium can be accessed via the internal core or external steps and links all the buildings on this plot.

- 6.6.16 Buildings will be well articulated through a clear two storey datum along ground level and the use of corduroy brick pattern to the base zone. To create visual diversity, the three towers would feature a red brick base zone with light buff brick above. The 'L' shaped building (D1.4 and D1.5) fronting the neighbourhood square would be constructed in two brick colours arranged in a striped pattern. This would be further articulated by the use of contrasting mortar. The lower podium building (D1.6) would be constructed in red brick. The balconies on the prominent corners of the taller towers would be staggered to help animate the façade along Avenue South. The double height entrance lobbies would further add articulation and enhance the experience along this street. All balconies would include coloured soffits to enhance the appearance of the development when viewed at street level up. Windows at upper levels would be set back from the building by a full brick depth to create deep reveals. The windows at the base zone would have a brick and half depth set back to provide a larger reveal.
- 6.6.17 In summary this plot continues the rhythm of tall interlinked blocks from the neighbouring Plot A1 (in an earlier phase). This part of the site can accommodate taller buildings without impacting on the context, an approach that has been supported by the DRP throughout. It is considered that the taller elements have been carefully designed to make a positive contribution to the primary street – high quality materials and details have been used. Recessing the link sections provides pockets of landscaped space to the street, which is a welcome move for the previously constrained primary street. Generous communal courtyards are located behind the blocks to the boundary of the site. These are interconnected and link to two different play areas at either side of the block, providing a strong network of landscaped space.

Plot D2

- 6.6.18 This plot is located on the southern edge of the site, fronting Avenue South to the east, residential street to the northwest and the energy centre (located on Plot D8) to the west. This plot features a courtyard block consisting of four buildings arranged around a central communal podium garden. The podium would contain car parking, cycle stores and servicing arrangements. Buildings D2.1 and D2.2 has been designed by Makower Architects and faces the energy centre and the park. Buildings D2.3 and D3.4 has been designed by Piercy & Company Architects and faces the neighbourhood square and Avenue South.
- 6.6.19 Plot D2 consists of four stepped buildings ranging in height from seven storeys to ten storeys. Building D2.1 is the lowest building facing the park and building D2.4 would be the tallest fronting neighbourhood square. Each of the four buildings would be stepped to break up its façade massing form. The massing fronting the neighbourhood square responds to the massing arrangement of the other buildings fronting the square.

- 6.6.20 The layout would include two commercial units proposed on the ground floor of buildings D2.1 and D2.4 which helps activate the ground floors fronting the neighbourhood square and the park. The corners fronting the park have been carved to articulate the building and provide better circulation for residents and visitors. A stepped access from the public realm to the podium courtyard is provided between buildings D2.1 and D2.4 in addition to access via the building core. The ground floor units facing the park will have private gardens facing the park, secured with railings to provide a defensible zone but these units would only be accessible via the main core. Other ground floor units will have their own entrances and 1.5m defensible spaces are provided in front of the duplex apartments.
- 6.6.21 In terms of appearance, it is proposed to use varied red tone bricks to each building and coloured mortar. Buildings D2.1 and D2.2 will use dark grey metal, whereas for buildings D2.3 and D2.4 dark red metalwork is proposed. A 1.5 storey height datum is proposed which would include textured corduroy brick bond. Double height entrance lobbies are proposed to buildings D2.1 and D2.2, which would be further enhanced through the use of contrasting glazed bricks which would continue through to the internal lobby area. The balconies to building D2.2 would be misaligned with windows to allow better daylight and to add visual interest to the façade, creating a checked board effect. The appearance of building D2.3 and D2.4 would be more regular and simple and articulation would be achieved through the varied brick bond, including the corduroy base zone. Communal entrances would be set back from the façade to give them more definition. Duplex entrances would be set back slightly and would have a different window grade to the main façade. The commercial unit has similar appearance, but different language to the residential in that it would be largely glazed with a small brick upstand.
- 6.6.22 In summary, Officers consider that the architects have worked together to develop a coherent design that also provides a varied response to the different edge conditions of green link and neighbourhood square. It is considered that the elevations are simply designed with high quality brick details, balconies are alternated to the green link edge providing a more relaxed and playful appearance.

Plot D2 – Extra Care Block

- 6.6.23 This plot has been designed by East Architecture. This building would be seven storeys in height and would have a 'L' shaped footprint and a rear access walkway to create a thinner profile for this building and with access to communal garden. The ground floor would comprise non-residential floor space, offering all communal and ancillary spaces associated with the extra care facility.
- 6.6.24 Given the simple form of the massing, a play on the façade has been taken through the use of a 'blanket' pattern approach. The blanket like pattern creates a strong and inviting architectural image by bringing windows and brick pattern together. The entrance lobby would be set back from the façade and would have contrasting materials to mark it. Large ground floor windows help signify the non-residential uses. It is proposed to use light brown/ grey brick to create the brick pattern with bold green to the main entrance and darker red for windows.

6.6.25 In summary, it is considered, that the distinctive brick 'blanket' elevation has been well designed. A subtle palette of materials has been carefully selected to compliment surrounding buildings whilst bringing a new character to this part of Primary Street.

Plot D4

6.6.26 This plot has been designed by PTE architects and it fronts the part to the west, Plot D2 to the south, Plot D5 to the north and Plot D6 to the east. This plot has been designed to have a continuous building frontage onto the park edge, with the massing articulated by steps in the building line and a step in the height of the southern building, bringing this element to eleven storeys in the height from the seven storey height of the mid-rise building. The building fronting the neighbourhood square would be fourteen storeys in height, being the tallest in the group of buildings fronting the neighbourhood square. The two taller elements on this plot will help sign post key points along the masterplan site. The part of the building fronting the residential street would be six storeys in height to relate to the domestic height of other buildings within the site.

6.6.27 A two storey datum is proposed throughout with a subtle variation between the two corner buildings and the rest of the buildings. The datum would be achieved through the use of coloured mortar along the base to create the tonal difference. A single multi-stock brick is proposed with contrasting white brick being used to building entrances. The corner buildings would be further articulated by horizontal brick banding through the use of different mortar. These buildings would also have recessed balconies. All other buildings would have projecting balconies. Double height entrances are proposed to buildings D4.1, D4.3 and D4.4. All other entrances, would be coupled with first floor openings to give a sense of grandeur and improve legibility. It is considered that elevations have been well designed to reference some of the past industrial heritage of the site, with simple openings and fenestration. Careful use of materials and details, with white brick surrounds to communal and private entrances and balcony reveals, aids the legibility of the building and streets.

6.6.28 The block pulls back to allow an additional, and more intimate public space, on the edge of the green link. This links to the landscape around the new community hub at the Energy Centre (Plot D8). It provides a much-improved setting for the Energy Centre and is a strong move in defining a good east-west link between the neighbourhood square and the green link. Two cafes are proposed on the ground floors of the two tallest buildings that front the park and the neighbouring square, with some provision of outdoor seating. These would help active the street frontage as well as relate to the functioning of the park and the neighbouring square as a new civic space. The buildings in this plot would be linked by a podium which will have a number of stepped access points to offer permeability through the site. The layout of the ground floor apartments and duplexes provide for at least a 1.5m defensible space between the apartment entrances and the public realm.

6.6.29 In summary, it is considered that this is a well-designed block, spanning between the green link and neighbourhood square. The mass has been manipulated to reinforce key connections on the site, with the tower to the square carefully judged

to signpost this central public space and be a visible marker along the primary route.

Plot D5

- 6.6.30 Located at the northern end of the park, this is the tallest building on the site. It is well placed as a landmark for the whole site and is of very high architectural quality, and the DRP supports the height and appearance of this building. The form and elevations have been designed carefully to make a positive contribution to the green link and wider context. The building would be eighteen storeys in height with a seven storey podium element.
- 6.6.31 A double height commercial unit faces the park edges. The permeable appearance of the ground floor is reinforced by the colonnade to the northern edge and makes a strong relationship with the public realm immediately surrounding the building. The adjacent yard forms a shared space with Block D4, with views through the ground floor commercial space from green link to yard.
- 6.6.32 The building uses a simple palette of carefully chosen materials. Red brick with red mortar is proposed with all metal work to be a deep red to ensure a common language between other buildings. Elevations are striated with pale concrete banding, giving a delicate appearance which helps to define the individual floors. The scale of openings and detail of the piers and concrete bands is adjusted on the upper two floors to create a visible 'crown' for the tower. The insert corner balconies help to break the massing and aids to the subtle elements of articulations. Overall, it is considered that the placement of this building at this location within the masterplan site would be suitable for a taller landmark building which is off a high quality design. It is also considered that the height and massing would appropriately relate to the group of taller buildings located this juncture of the masterplan site.

Plot D6

- 6.6.33 This plot is made up of two separate, but corresponding, blocks with central communal landscaped courtyards. The buildings would range in height from six to eight storeys. This plot fronts Avenue North and Plot D3 (Industrial Land) to the north-east, Plot D1 to the south-east, Plots D4 and D5 to the south-west and the park and Plot C1 to the north-west.
- 6.6.34 In terms of layout, both courtyard blocks would feature four buildings arranged around a podium with parking and servicing below. The access to the parking court would be from Avenue North. The ground floor of building D6.6 would comprise 163.5sqm of flexible commercial floor space fronting the neighbourhood square. Each courtyard block would have a break in building form providing a pedestrian access from the podiums to the residential street. Units fronting Avenue North and residential street would adopt a gallery access typology to enable these units to be dual aspect units. Building D6.6 is slightly cranked to address the bend to Avenue North and South and to increase the gap to this building and building D6.4, and to also provide a larger courtyard.

- 6.6.35 Units fronting the park would have deep front gardens ranging between 4m-6.5m which would provide generous defensible area from the public park. Units fronting the inner residential street (between both courtyard blocks), Avenue North and the duplexes located along the main residential street would have their entrances recessed from the main building façade and a defensible planting zone would be provided. The duplexes located in building D6.6 will have a raised stepped entrance and a 1.5m defensible planted strip. Level access to these units would be provided via the main communal core at first floor level.
- 6.6.36 In terms of appearance, it is proposed to use red and bark brown bricks. The buildings have been designed with a distinctive datum in dark brown brick, with a dark mortar which changes in height as it moves around the buildings. The building facing the neighbourhood square would be entirely in brown brick to distinguish it from the remaining courtyard buildings and to address the important juncture at this location. The communal entrances are designed to be double height to enable a visual connection from the street up to the communal gardens. Windows would be finished in dark brown. The metalwork to balconies, bin store, bike stores etc. will be finished in an olive green metal finish. In addition white brick returns are proposed to ground floor setbacks. The upper datum would be a red brick with a light coloured mortar. Windows at this level will be in dark brown metal finish. Further articulation would be achieved through simple set of details which include soldier course headers above all windows with a thicker staggered soldier course dividing the lower and upper datum.
- 6.6.37 In summary, the eastern most block has a good relationship with the neighbourhood square, with access to the courtyard immediately fronting the corner of the square, providing the opportunity for a cohesive sequence of landscaped spaces. This arrangement was praised by the DRP and is a good example of the benefit of gate-free access to the courtyards. The quality of the street between the two blocks has also been carefully considered, with well-defined individual front doors lining both sides. There is a coherent relationship throughout the whole scheme between buildings and dwellings and public realm, and this makes for good streets and places across the site.

Landscaping

- 6.6.38 The proposal includes a series of special landscape spaces located within a cohesive network of residential streets. The new Neighbourhood Square would form a new civic space and links all the streets on the site and brings orientation to this area of the scheme.
- 6.6.39 A community square is proposed at the southern edge of the site which would straddle the boundary with Zone A and its community space. The design of this space will ensure a cohesive approach across both sides, but equally designed to be a good public square in its own right.
- 6.6.40 The green link edge would be designed with deep planted private gardens set amongst hard landscape to support the functioning of the shared route running parallel to the park. The space around Plot D5 would be largely hard landscaped

to support the commercial use located at the ground floor of this plot, but would also include soft landscaped areas with external seating incorporated.

- 6.6.41 The energy centre environ between Plots D2 and D4 widens and pulls the park into the site. This area will support outdoor commercial seating area associated with the commercial unit located in the ground floor of Plot D4 along with providing a natural play area.
- 6.6.42 Avenues North and South are the primary route in the masterplan site and accommodates all vehicle traffic and service access. This route will be designed to support the urban form of the site. Whilst this route will be largely formal in terms of its hard landscape, the experience along this route will be softened by the deep planted defensible spaces and street planting. In addition, there would three deep pocket spaces along the frontage of Plot D1 to help enhance the spatial richness of the street, and provide for public and private greening and informal play opportunities.
- 6.6.43 The residential streets offer a sense of varied ways through and around the site. These routes will be shared surface with banks of car parking, but priority will be given to pedestrians and cycle access, with parking located on one side of the route.
- 6.6.44 Each of the podiums would have a similar design principle with the layout adjusted to fit the size and geometry of various communal gardens. All podiums can be accessed from street level as well as through the communal cores. Generous steps with appropriate landscaped banks would be provided to connect to the streets. The gaps created between the buildings will ensure that the gardens are visible from the street. The landscape strategy does include gates to communal gardens and these will be managed by the applicant so that they are open in the day and closed in the evenings. The podiums will include private terraces which would be enclosed by railings and landscape hedging to provide defensible space and privacy to those units. The soft landscaping strategy would include planted mounds to provide opportunity for tree planting and to add visual interest, and play opportunities.
- 6.6.45 In terms of the site wide tree planting strategy, this will ensure the use of appropriate species along the key routes. This will be either in form of row of street trees or areas of clumps of trees located at the end of visible sight lines. The neighbourhood square is designed with a singular tree canopy formed of a grid pattern. Small rounded trees are proposed for podiums.
- 6.6.46 Overall it is considered that the landscape strategy for the site is strong and should serve as an exemplar for Harrow. The sensitive, and inclusive, design of the public realm and landscapes throughout helps to make a coherent neighbourhood, with a variety of different types and scales of public and communal space to work for a diverse community.
- 6.6.47 Streets are high quality spaces with parking sensitively incorporated - a range of methods to mitigate the impact of cars through landscape have been used successfully. Considerable care has also been taken in the design of front gardens

so that they are both generous to the street and provide privacy for the residents. Planting strategies and choice of materials are well judged, creating a characterful and vibrant public realm.

- 6.6.48 The DRP emphasised the importance of making a child friendly neighbourhood that incorporates play holistically, and the scheme has responded well to this. The public realm is designed throughout to work for all ages and groups. The communal podium courtyards have the potential to be good spaces well used by the community. It is important that these remain ungated during daylight hours – this point was also made by the DRP at all of the reviews – so that they do not become inaccessible and under-used. This is also crucial in supporting a child friendly city, allowing children and young people to move easily between blocks and visit neighbouring friends. A suitably worded condition is recommended to this effect.
- 6.6.49 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. A condition is also attached in relation to the details for the boundary adjoining Waverley Industrial Estate and an appropriate condition relating to the gated access operation relating to the podium gardens as set out in the appraisal above.

Refuse Storage

- 6.6.50 The supporting Design and Access Statement (DAS) (Volume 2) sets out the refuse arrangement for each plot. The plans show that each of the buildings will have its own dedicated refuse store and other than Plot D5 all of the refuse stores can be accessed by the residents from the core via the lobby and by refuse collectors directly from the street. All communal bin stores would be located in proximity of the road ensuring the dragging distance between the door of the store and the kerb line is less than 10m as required by the Council's Refuse Collection Code of Practice. The quantum of residual waste and recycling waste bins provided for each building would be in line with that stipulated in the Councils Refuse Collection Code of Practice, which requires a provision of 1 large bin per 8 flats. Separate refuse storage provision will be made for all commercial premises which would be located within the demise of those units.
- 6.6.51 With regard to Plot D4, the bin stores for building D4.5 would be located at the sides of this building and therefore would not be within the required 10m dragging threshold. A managed strategy would therefore be required for this building to ensure that the bins are brought out to a suitable collection point on the day of collection and returned to the designated store thereafter. A condition is recommended to this effect. For the eight duplexes that are located on the ground floor of buildings D4.1 and D4.5 would have their own bin stores that are located within their front amenity area. The ground floor units located on the ground floor of buildings D4.3 and D4.4 would have access to the main communal bin stores given their location fronting the main park.

- 6.6.52 Plot D5 will have a managed refuse strategy to reduce the size of the refuse stores along the main building façade. It is proposed to have an externally accessible 'tenant store' at the ground located within close proximity to the secondary entrance to the residential lobby which will allow easy access for residents. A larger 'managed store' would be located within the ground floor of the lower podium block. This store would not be accessible by residents, but would contain the additional bins that the building management team can rotate with those located within the tenant store as and when required. The managed store would be within the 10m collection distance and the bins from the tenant store would be moved to the management store on the day of collection. The total number of bins provided across both stores for this plot is sufficient to serve this part of the site. As the strategy for this plot is set out in the DAS, and the bins would be located within designated stores there is no need for a condition requiring any further details, other than the standard condition requiring the bins to be kept in the designated stores at all times other than at the time of collection.
- 6.6.53 With regard to Plot D6, the ground floor flats and duplexes would be provided with their own designated refuse stores, which would be within the 10m collection distance. The eight ground floor flats that are located in the inner residential street situated between both courtyard blocks would also have their own refuse stores; however, as this part of the residential street would not be accessible to service vehicles, a managed collection strategy would be required for these units. The DAS states that the bins will be moved to either Avenue North or the southern residential street on the day of collection, This strategy is considered to be acceptable, however, it is considered important to ensure that as part of the detailed landscaping works that a suitable collection point is provided which is within the acceptable collection distance, but ensuring that such does not impede safe pedestrian access. Details for this would be secured as part of the landscaping condition.
- 6.6.54 Overall, it is considered that the proposed refuse strategy is satisfactory and the proposal would make sufficient provision for refuse bins to serve the development. Subject to the conditions as recommended above, along with the standard condition requiring that other than on the day of collection for the plots that have an agreed managed strategy, the bins to be stored in designated stores at all times, the proposal would meet the requirements of policies DM1 and DM45 of the DMP and policy AAP4 of the AAP.

External Lighting

- 6.6.55 In terms of external lighting, the applicant has submitted a lighting strategy, which sets out that the external lighting has been designed in the best possible way for visual comfort, biodiversity and suitability. All luminance levels would be within the relevant recommended guidance. Whilst the strategy provides examples of luminaire types, the final equipment details and detailed external lighting designed would need to be secured by condition.

6.6.56 The strategy will ensure that all night time lighting is concentrated in the appropriate areas; upward lighting is minimised; light pollution is minimised; energy consumption is minimised and all external lighting is time controlled. The strategy covers the following:

Primary Road (Avenue North and South) – would feature columned highway lighting with low energy warm white light to meet adopted road standards. The columns would be the same as proposed elsewhere on Primary Road on the wider master plan.

Residential Streets and Squares – would feature lighting fixed to buildings to avoid street clutter and would include low energy warm white lighting to give good colour to these public spaces.

Park and Play Spaces – these areas would feature pole lighting to tie in with the green link.

Ground fixed up lighting to trees to neighbourhood square trees.

Podiums and access – these would feature bollard and brick lighting to give good colour rendering across footways surfaces and low level planting.

External building lighting – all main entrances would be illuminated by soffit mounted downlights/ wall mounted lights. In addition to this, wall mounted luminaries are proposed to all residential balconies.

6.6.57 It is considered that whilst the overall strategy set out above is broadly accepted, however, the proposed lighting to the residential streets which would feature lighting fixed to buildings remains a concern and it is not clear from the strategy if the shared surface route would be adequately lit for safe passage for pedestrians and cyclists. The lighting strategy for the wider masterplan site approved under the outline permission P/2165/15 and the detailed strategy subsequently approved under the reserved matters permission granted for Plots B1, C1 and D7 and Zone A, showed that the secondary route lighting to feature lighting columns to help illuminate these routes. Given that the residential street under this current application is broadly the same as the secondary routes defined for the wider masterplan site, it is considered that the lighting approach should be the same as that already agreed for the secondary routes within the wider masterplan site to ensure that these routes are adequately lit to provide safe pedestrian and cyclist passage. A condition is recommended to this effect.

6.6.58 Subject to the conditions noted above, it is considered that the overall lighting strategy would be broadly acceptable.

Fire Strategy

- 6.6.59 The applicant's DAS sets out the various strategy for each of the Plots which demonstrates that fire strategy has been considered during design development. The strategy would include cores that are designed to be fire fighting cores with the provision of firefighting lifts and provision of dry risers, minimum stair width of 1100mm, main entrances lobbies ventilated and sprinkler system for residential units. The Mayor under his Stage 1 response has requested that a Fire Statement produced by a third party suitably qualified assessor should be secured in accordance with policies D3 and D11 of the draft London Plan to ensure that the development proposals achieve the highest standard of fire safety. A condition is recommended accordingly.

Conclusion

- 6.5.60 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. It is considered that the proposals would meet the high quality design and landscape aspirations in accordance with the policies listed under paragraph 6.6.1 of this appraisal.

6.7 Residential Amenity, Quality, Noise and Accessibility

- 6.7.1 The relevant policies are:
NPPF: Chapter 8
London Plan: 3.5, 3.6, 3.7, 7.6 and 7.15
Harrow Development Management Local Policies: DM1, DM2, DM27 and DM28
Harrow and Wealdstone Area Action Plan: AAP3, AAP4 and AAP13
Draft London Plan: D4, D5, D6 and D13
- 6.7.2 In addition to the above policies, the Mayor has published a Housing SPG (2016) which sets out the 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 and reinforced under policy 3.5 of the London Plan and policy D6 of the draft London Plan. Each of the key standards are appraised below.
- Defining good places*
- 6.7.3 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. It would provide a number of prominent new buildings within the townscape with clearly defined routes and opportunities for new landscaping to the street frontages and creation of new public open space which appropriately relates to the wider masterplan site. It would also add to levels of natural surveillance of the immediate surroundings. It is therefore considered that the proposal would enhance the quality of this part of area in accordance with the principles of London Plan Policy 3.5.

Communal and Public Open Space

- 6.7.4 The proposal would make provision for communal open space through the provision of podium gardens for each of the plots. These spaces have been well designed to allow semi-public access from street level through the creation of steps up to the podium level. This will help create a sense of community for the future residents by permitting residents from different plots to interact with each other. In addition to this, residents will have access to the generous green link which is to be provided on the wider masterplan site located in Plots C1 and D7, and the southern link provided on Development Zone A. Residents would also have access to other pocket of green spaces create through the provision of the new neighbouring square and the community space located to the southern end of the site as well as the green square to be delivered on the wider masterplan site located in Development Zone A. 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.

Play Space

- 6.7.5 The proposed development will make provision for play space for children falling within the age group of 0-5 years which would be provided as door stop play within each of the podium gardens. Play space for children falling within the age group of 5-11 years would be provided in form of a linear play space located to the north-east of Plot D1 and a woodland play space located at the southern end of Plot D1, and a further natural play area situated at the edge of the green link fronting Plots D2 and D4. There is no provision directly on site for the age group of 12-18 years. Play space for this age group is to be provided off-site (but still within the ownership of the applicant) on the green link (Park) located in Plot D7. Play will comprise elements of natural play alongside carefully selected equipment. Overall the total play space provided on site will be 2,335sqm with of 540sqm provided off-site within the green link, amounting to a total play space provision of 2,905sqm.
- 6.7.6 The GLA's 2012 child yield place space calculator generates a yield of 296 children and would therefore require a place space provision of 2,960sqm based on a provision of 10sqm per child. The total play space proposed would fall slightly short of the 2012 GLA requirements. The LPA's child yield calculator set out under Appendix 1 of the Planning Obligations and Affordable Housing SPD (2013) when applied, generates a greater child yield and assumes a yield of 491 children. However, the space required per child is set at a much lower threshold than the GLA's benchmark at 4sqm per child. This would require a provision of 1964sqm. However, since the publication of the 2012 yield calculator, the GLA have issued a new yield calculator in June 2019. Applying the 2019 GLA yield calculator, the development would yield 438 children and therefore would require 4,380sqm of play space.
- 6.7.8 The Council's Planning Obligations SPD, is informed by Harrow's PPG 17 Study and specifies that a standard needs to be set that is both aspirational and also achievable. For this reason, the quantity standard for children's play space within Harrow has been set at 4sqm of dedicated play space per child. When assessed against the Council's own benchmark, the development would provide more than

the required dedicated space equating to 1,964sqm, albeit that the provision for older children play space would be provided off-site on the green link. Notwithstanding this, the LPA consider the quantum of play space provided is acceptable for the reasons set out below.

- 6.7.9 It is noted that the Mayor's Stage 1 response sets out that the development should provide play space in line with the new GLA yield calculation published in June 2019. The response goes on to state that robust justification must be provided to address any shortfall, noting the uplift of approximately 900 residential units this application proposes within the context of the wider outline scheme, and a financial contribution should be secured by the LPA toward offsite delivery. However, at the point when the GLA published its new child yield calculator, the masterplan layout had been significantly progressed and therefore the quantum of play space under the new calculator could not be provided without a fundamental revision to the layout itself. Furthermore, this scheme had been presented to two separate pre-application meetings to the GLA and the matter of play space provision had not been raised as an issue.
- 6.7.10 It is further considered that the proposed development has to be considered in the context of the wider masterplan forming part of the Harrow View East site, which will be delivering a generous green link and community square (public open space) of circa 23,520sqm across the entire Harrow View East masterplan site (based on the correct parameter plans approved under the non-material amendment application P/3004/18).
- 6.7.11 The development should also be considered against the wider context and should have regard to its former relationship to the former Kodak Zoom Leisure site, which together with the Harrow View East (former Kodak Factory site) formed part of a single masterplan approved under the first outline permission granted under application P/3405/11. When the second outline permission was granted under P/2165/15, the former Kodak Zoom Leisure site was rebranded as Harrow View West and was sold to Persimmon Homes who are currently delivering the development granted under the first outline permission. Harrow View West will deliver a further circa 27,000sqm of open space which would also include dedicated play space. Fundamentally the green link arm provided on the Harrow View West site would terminate on to a large park area that would directly connect to Headstone Manor and its playing field.
- 6.7.12 Having regard to the immediate site context and that of the wider area and the Council's aspirations of delivering this new open public space through the provision of a new green link connecting both Harrow View East and West sites and the wider Headstone Manor grounds, together with the various play space provision, including the provision of a multi-use games area pitch (MUGA) on the Harrow View West, it is considered that the proposal would have no detrimental impact upon play space provision for the future needs of this site. It is also noted that when the second outline permission was granted under P/2165/15, the original section 106 relating to the first outline permission P/3405/11 was also varied and which secured, amongst other contributions, a contribution of £164,836 to be paid by the Harrow View West owner to the Council towards the improvements to Headstone Manor Recreation Grounds, prior to the occupation of Harrow View

West. In light of contributions already secured for improvements to the local recreation grounds, it is not considered that further financial contributions are required in this instance.

- 6.7.13 In view of the above, the LPA considers that the quantum of play space for the age groups of 0-5 years and 5-11 years on site, and the off-site provision for age group of 12-18 years provided on the wider masterplan site, together with the wider site context set out above, the play space provided is considered to be acceptable and the proposal would not give rise to any conflict with the relevant policies set out under paragraph 6.7.1 above. Details relating to the actual play equipment and layout would be secured by condition. Furthermore, as noted above the provision of semi-public access across all of the podium gardens would encourage social interaction between future residents and reinforce community cohesion.

Entrance and Approach/ Active frontages

- 6.7.14 As noted under the character and appearance section above, all communal entrances would be clearly defined to strengthen the legibility of the key access points. Similarly, the individual entrance to ground floor apartments and duplexes would be clearly defined by setting entrance thresholds back from the main building façade which would be domestic in scale and appearance. The access to the podium gardens would provide safe and legible access for residents.

- 6.7.15 All entrances would be afforded natural 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.

Shared circulation

- 6.7.16 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.

- 6.7.17 In respect of Plot D1, each of the building cores would be served by two lifts, which includes one large lift. Buildings D1.1, D1.2 and D1.3 would contain up to 5 units per core. Building D1.4 would include up to 6 units per core and building D1.5 would include up to 8 units per core. Natural light would be provided to each of the cores through the provision of windows to each of the floors.

- 6.7.18 In terms of Plot D2, building D2.1, would be served by two lifts, of which one would be a larger 13 person capacity lift. However, this building would include up to 11 units per core on the first floor and 12 units per core on floors 02 to 06. The number of units would exceed the 8 per core recommended in the Mayors SPD, however the corridors would be naturally lit and the layout of buildings being 'L' shaped breaks the length of the internal corridor making it appear shorter in distance. In this regard, it is considered that the layout is considered to be acceptable in light of the wider design benefits achieved for this building. The

Mayors Stage 1 response concurs that the applicant has provided satisfactory justification that ensures overall residential quality is of a high standard.

- 6.7.19 Building D2.2 (Plot D2) would be provided with two lifts and as with building D2.1, one lift would be a larger capacity lift. The cores would be naturally lit and there would be up to 6 units per core, which is considered to be acceptable.
- 6.7.20 Buildings D2.3 and D2.4 would be served by two lifts each and each core would be naturally lit. Building D2.3 would have up to 5 units per core, whereas building D2.4 would have up to 8 units per core. This is considered to be acceptable and in line with the guidance.
- 6.7.21 With regards to the Extra Care block (also located in Plot D2), this building would be served by two lifts of which one lift would be a 13 person capacity lift. Whilst the core would have 10 units per core, given the generous open walkway access and the 'L' shaped layout, the proposed development would achieve a good residential standard. This is also accepted in the Mayor's Stage 1 response.
- 6.7.22 Building D4.1 (Plot D4) would be served by a single lift and would have a naturally lit core. Given that the height of the building would be less than eight storeys, the provision of a single lift is considered to be acceptable. Each core would have up to 6 units, which is considered to be acceptable.
- 6.7.23 Building D4.2 would be served by two lifts and would be naturally lit and would have 6 units per core. Buildings D4.3 and D4.4 would each be served by a single lift that would be naturally lit and would have up to 5 units per core. Building D4.5 would be served by a single lift that would be naturally lit and would have up to 4 units per core. Building D4.6 would be served by two lifts that would be naturally lit and would have up to 6 units per core.
- 6.7.24 Plot D5, is a single building that is served by two lifts, which would have to 8 units per core. Given the lower seven storey podium building, the core up to the seventh floor would not be naturally lit. Above eighth floor over the core would be naturally lit. This is considered to be acceptable, given the overall high standard residential quality of this building.
- 6.7.25 In terms of Plot D6, building D6.1 would be served by two lifts that would be naturally lit and would have up to 8 units per core. Building D6.2 would be served by a single lift, would be naturally lit and would have up to 8 units per core. Building D6.3 would be served by a single lift, would be naturally lit and would have up to 5 units per core. Building D6.4 would be served by a single lift, would be naturally lit and would serve up to 6 units per core. Building D6.5 would be served by a single lift, would be naturally lit and would have 8 units per core. Building D6.6 would be served by two lifts, would be naturally lit and have up to 8 units per core.

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

Dwelling space standards / internal heights/ flexibility

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

6.7.28 In terms of Plot D1, all of the units are shown to meet the minimum or exceed the minimum space standard. In terms of internal layout of units D1.4.03 and D1.5.03 show that the second bedroom to these units would measure 11sqm. Whilst this would marginally fall below the space standard of 11.5sqm for a two person occupancy, given that each of these units would have an overall GIA that exceeds the minimum space standards, the marginal short fall would not result in a detrimental impact upon the overall quality of these units to warrant a refusal on such basis.

6.7.29 In terms of Plot D2, Plot D4, Plot D5 and the Extra Care Block, all the units these blocks are shown to meet the minimum space standards. In terms of Plot D6, all of the units would meet the minimum space standard with the exception of units D6.6.1.3, D6.6.1.1, D6.6.2.6 and D6.6.2.8 are shown to have a GIA of 69.9sqm for a 2bed 4 person unit. The minimum requirement for this size of unit is 70sqm. It is considered that a shortfall of 0.1sqm 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.

6.7.30 The development would also achieve the minimum floor to ceiling height of 2.5 metres as required by the Housing SPG.

6.7.31 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. In addition to internal storage space for each unit, within buildings D1.4 and D1.5 the first floor plans to each of these buildings would offer additional storage space located within the communal lobby area for future residents.

6.7.32 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.

Access

6.7.33 Policy 3.8(c) of the London Plan relating to Housing Choice, requires 90% of homes should meet building regulations M4 (2) – ‘accessible and adapted 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.

6.7.34 The Extra Care facility includes lift access to upper floors, mobility scooter parking and each of the units are of adequate size and suitable layout for the intended occupiers of these units. It is noted that the Council's Housing Enabling Manager and Adult Services Team have stated that the assisted bathrooms that are placed on the open walkways would be unusable during colder months as residents are vulnerable people and such bathrooms are not conducive to their dignity. Whilst these rooms are annotated as being assisted bathrooms, the floor plans appear to also suggest that these rooms could be used as communal tea rooms. The applicant has also stated that these rooms could easily be used for other care home operational purposes and therefore not strictly wedded to be solely used as assisted bathrooms. These rooms on each floor offer flexibility for the end operator(s) to determine how best to use these spaces and this can be dealt with as part of their detailed design stage. In this regard, the proposed layout overall would be acceptable.

Private open space

6.7.35 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. With the exception of 3 studio units located at first floor level in Plot D5, all units would be provided with adequate private amenity space in form of either balconies or terraces. Units D5-01-01; 02 and 03 are all studios and the GIA to each unit exceeds the minimum space standards for these types of units. The applicant has confirmed that due to the position of these units directly above a commercial entrance and colonnade it was considered that balconies at this location would not be appropriate. To compensate for this, the GIA to these units is generous. In view of the fact that these units are single occupancy studios and that other forms of external amenity space would be provided on site, by way of access to podium gardens and the park, it is considered that the lack of private amenity space for these three units in the grand scheme would not warrant a refusal on such grounds.

6.7.36 The Council's Adult Services Team have raised a point with regards to the positioning of the balconies to the Extra Care block directly from the bedroom as opposed from the living rooms, as this is likely to reduce access to balconies and reduce natural airflow through the living room which is where the majority of the time will be spent. This is not uncommon and there is no specific requirement in the Mayor's Housing SPG that a balcony has to be located off a living room. As these balconies would be sufficient in size and would be private, these are considered to be acceptable. Furthermore, all of the units within this block would have large openable windows serving the main living rooms with high level Juliet and safety railings to allow occupants of these units to be able to fully open the windows to these rooms to allow light penetration and natural ventilation, in addition to views out. As such, the proposal is acceptable in this regard.

Privacy

- 6.7.37 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.
- 6.7.38 As a high density scheme there would inevitably be some overlooking relationships between homes within the development. These occur in elevations fronting the podium levels, facing the streets and where buildings have gaps in the buildings to provide podium and yard access. 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.
- 6.7.39 Broadly Plots D1, D2 and D6 follow the yardstick approach and maintain separation distances of more than 18m. However, given the irregular plot configuration between Plots D4 and D5, the separation distances are much less. The layout between the two Plots shows that main primary living windows would face the main street and the park with the inner side elevation whilst containing habitable room (bedrooms) windows would face an opposite wall of Plot D4 that contains secondary windows to help activate these elevations through the gaps of the buildings.
- 6.7.40 A number of the balconies and private gardens throughout the development would be sited adjacent to each other, or adjacent to neighbouring windows. However, as noted above the level of overlooking between the balconies would be an acceptable condition in regard to the high density scheme such as this. It is noted that the Council's Adult Services Team have raised issues with the proposed location of the private amenity spaces adjacent to the communal walkway in the Extra Care block. Whilst this would not provide the traditional balcony form of amenity, given that the proposal would provide an adequate level of designated amenity which will be demarked by the change in ground surfacing as well as providing a low defensible wall segregating these amenity spaces from the communal walkways, it is considered that the proposal would provide an acceptable form of private amenity. Furthermore, this form of amenity layout would be no different to those units that have their private amenity positioned in front of their front door at street level, as seen elsewhere within the masterplan site. In this regard, the layout of amenity to the Extra Care block is considered to be acceptable.
- 6.7.41 As noted under the character and appearance section of this appraisal, the ground floor gardens and those units fronting the podium level would maintain sufficient defensible zones from the public realm to ensure the privacy of the occupiers of these units.
- 6.7.42 On balance, having regard to the high density nature of the proposal, which is consistent with the need to make effective use of this 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.

Dual Aspect

- 6.7.43 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.
- 6.7.44 The applicant has sought to exploit opportunities where possible to create dual aspect dwellings (up to 57% of the total units). However, it is noted that a large proportion of the units would be single aspect given the constraints of the site. Whilst the preference would be for dual aspect units, the proposed units would have east, south and west facing aspects and thereby each unit would receive adequate levels of natural daylight. All units that are north facing are shown to be dual aspect, with the other elevation facing east, south or west. However, the DAS set out that there are three units within the overall scheme that are north facing and single aspect. It is considered that the single aspect nature of this development would be off-set by the good internal layout and circulation for each of the units.

Noise

- 6.7.45 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.
- 6.7.46 Due to the Block configuration and the number of single aspect units, a number of flats would have bedrooms sited adjacent to living/ kitchen areas of adjoining flats. In the case of the cores to the individual 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 and therefore would be required to ensure that sufficient noise insulation is provided to meet Building Regulations. 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.
- 6.7.47 A Noise and Vibration assessment has been undertaken as part of the ES (Chapter 9). This assessment sets out the noise and vibration survey that was undertaken both in assessing the impact during the construction phase of the development, given the phased build programme and the impact once the development is completed. The ES sets out a number key mitigation measures (based on the results set out in the technical appendices appended to Volume 3 of the ES) that should be included during the construction phase to protect parts of

the sites against the construction activity. This includes securing an appropriate Construction Environment Management Plan (CEMP).

- 6.7.48 The ES sets out that specification of plant machinery with low noise emission and properly attenuated supply and extract termination will help that noise emissions are minimised. The use of enclosures, local screening, mufflers and silencers will also be used as appropriate, if mitigation is required to reduce levels to meet the LBH standards. Façade configurations, including glazing and ventilation specifications, will be finalised for all blocks of the proposed development during the detailed design stage. The recommendations include the appropriate use of thermal double glazing with differing pane thickness and the installation of acoustically-rated “through the frame” trickle ventilators which should include medium specification trickle ventilators for those units directly exposed to the railway line and industrial units. Standard type trickle ventilators would be sufficient for the remaining parts of the proposed development. As this is at an early stage and specific plant selection has not been made, compliance with these will need to be confirmed once the plant is chosen, which can be conditioned. In terms of vibration, confirmation that plant, flues etc. are installed with adequate anti-vibration measures would be required, which can be conditioned.
- 6.7.49 The methodology adopted in the external fabric assessment is broadly similar to that applied under for the previous reserved matter permission granted for Plots B1, C1 and D7. Likewise the noise report submitted under this application is the same that was submitted under the previous reserved matter applications. The Council’s Environmental Health Officer did provide comments in the previous reserved matters application relating to Plot D7 and in general raised no objections and recommended suitable conditions to deal with the detailed specification for any mechanical plant and ventilation equipment that will be required. The Council’s Environmental Health Team were consulted in respect of this current application, however no detailed comments have been received, but they have confirmed that similar conditions should be imposed that have been previously used on the wider site. Given that the methodology adopted in the current assessments are the same as that adopted in the previous application and likewise the sound mitigation measures, it is considered that subject to the imposition of similar conditions as that imposed under previous applications, there would be no detrimental impact upon the future occupiers of the development.
- 6.7.50 The proposal would include flexible active uses, including cafés and restaurant uses within the ground floor of different building located along key routes within the masterplan, including the new neighbourhood square. The applicant has provided a Ventilation Report in this regard. This sets out that the developer shall be providing shell and core units, provisions will be made for external louvers and space provisions to allow the tenant to install local or zonal mechanical ventilation units with heat recovery, and kitchen ventilation fans (when appropriate). It will be the responsibility of the tenant to ensure the type of ventilation is suitable for the occupation and use designation. The restaurant/ café shall be required to install additional equipment to prevent and control odours to external. The report sets out the minimum specification for specific fan power, heat recovery efficiency and recommended filtration and odour control measures. It is considered that detailed ventilation and odour control for each unit can be controlled to ensure suitability

against the recommendations set out in the Ventilation Report. In order to ensure that there is no unreasonable noise disturbance from such uses, appropriate conditions are also imposed restricting any audible music from these premises, operating hours and the types of uses.

- 6.7.51 Plot D1 would be located within close proximity to the Waverley Industrial Estate and Plot D6 would be located opposite the designated SIL land (Plot D3). Draft policy D13 of the London Plan relating to 'Agent of Change' requires that new noise and other nuisance-generating development proposed close to residential and other sensitive uses should put in place measure to mitigate and manage any impacts. This should be managed through good design mitigation during earlier design stages. Developments should be designed to ensure that established noise and other noise-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them. The Mayor's Stage 1 response requires that the applicant would need to demonstrate that consideration has been had to these 'Agent of Change' principles in respect of the development being proposed. The applicant is expected to provide a response to this affect. Notwithstanding this, Officers consider that in respect of Plot D1, the positioning of the buildings, together with the podium level, the solid boundary treatment proposed along this shared boundary will help towards to mitigate any impact against direct noise. Further, the layouts of the units have been designed to ensure that main habitable rooms have oblique views of the neighbouring employment land. Further mitigation would also be achieved through the changes on site levels, whereby the neighbouring industrial land is sited at much lower level datum level than the subject site. As noted above further mitigation can be achieved through incorporating appropriate noise attenuation through the building fabric design. Notwithstanding the above, the principle of these adjacent uses has already been accepted under the two previous outline permissions.
- 6.7.52 With respect to Plot D6, this plot would maintain a separation distance of at least 20m from the Plot D3 which is designated SIL and will be brought forward by a different land owner and likely to be brought forward in line with the parameters set out under the consented outline permission P/2165/15. As noted elsewhere in this appraisal, the layout to buildings D6.2 and D6.5 has been designed to provide a gallery access to the upper levels of these buildings, with the main living areas and private balconies orientated towards the podium courtyards to provide that additional mitigation from both the busy thoroughfare of the Avenue North and the proposed SIL development to come forward on Plot D3. In additional, the ground floor units have been designed to have sufficient defensible depth of at least 3m. Subject to ensuring that the recommendations set out in the applicants ES are undertaken with respect to the building fabric design fronting the proposed and existing industrial land uses, it is considered that the proposed development would not give rise to any detrimental impact upon the future development or the viable use of these neighbouring employment land uses. In this regard the proposal is considered to be acceptable in respect of draft policy D13 of the London Plan.

Daylight and Sunlight

- 6.7.53 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).

- 6.7.54 The applicant has supported a daylight and sunlight report, which is based on the Building Research Establishment’s (BRE) ‘Site Layout Planning for Daylight and Sunlight: A Good Practice Guide’. The assessment considers the quality of sunlight and daylight to the new residential dwellings. The methodology adopted is considered to be appropriate.
- 6.7.55 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 assessing daylight to combined living/ kitchen/ dining rooms, where kitchen areas are located to the rear proportion of such rooms and would receive lower levels of daylight, these have been omitted from the calculations and the assessment is based on the habitable living area only. Hence an ADF target of 1.5% has been adopted.
- 6.7.56 The results show that overall daylight amenity within the proposed accommodation will be very good. Overall 2834 of the 3260 rooms tested will achieve their respect ADF target, within the maximum parameter massing occupying the neighbouring sites. This achieves a compliance rate of 87%, which is very good result for this scale of development. Even if the 2% ADF target was applied, the compliance rate would be still very good at 85%.
- 6.7.57 However, the extra care unit would achieve a lower compliance rate of 52% due to a number of small kitchens that do not reach the recommended 2% compliance rate. The windows serving these kitchens are located under wide access decks which limit the amount of daylight entering these kitchens. The wide access decks provide wheelchair access as well as an amenity area for occupiers. The windows would provide outlook over these access decks. If these kitchens were excluded from consideration, the compliance rate would rise to 80%. Having regard to the wider scheme benefits of providing decked access and amenity areas for future residents, together with the high quality design standards achieved for the units, it is considered that on balance, the lower compliance rate would be acceptable in this case.
- 6.7.58 In terms of sunlight, 43% of windows would meet the BRE Guidance for APSH. The lower compliance rate is mainly due to the northerly aspect of these rooms. However, on balance, having regard to the wider scheme benefit delivered and the

overall quality of the units in terms of their size and internal configuration, the proposal is considered to be acceptable.

- 6.7.59 In terms of sunlight levels to external courtyards, the proposals show that on the 21st of March the court yards to Plots D4 and D6 would receive then sunlight to less than 50% for a period of at least 2 hours. However, for Plots D1 and D2 the area coverage would be more than 50%. When assessed for 21 June, all of the external courtyards would receive more than 50% sunlight for a period of 2 hours. This demonstrates that each of the courtyards will receive good sunlight amenity throughout the summer months when then are most likely to be used.
- 6.7.60 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. Thus, whilst a small proportion of the tested rooms/windows would not achieve the recommended BRE standards, across the development as a whole, it is demonstrated that the majority would.

Conclusion

- 6.7.61 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 under paragraph 6.7.1 above.

Impact of Development on Neighbouring Occupiers and Consented Scheme

- 6.7.62 The ES accompanying this application provides an impact assessment on daylight, sunlight and overshadowing to in relation to the future occupiers of neighbouring consented scheme (Chapter 11). Given the location of the subject site, there would be no direct impact upon existing neighbouring residents located outside of the wider masterplan site. For the purposes of this application only the future impact upon the consented schemes located in Plots A1, A4, A5, C1 and D7 has been considered.
- 6.7.63 Whilst typically the measure of assessing impact on existing neighbouring development would adopt the vertical sky component (VSC) to assess the how much of the light from the sky is blocked by obstructing buildings, the applicant has adopted to use the ADF approach to ascertain the impact upon the neighbouring consented schemes. Whilst the use of ADF in the assessment of existing buildings is not generally recommended, the BRE Guidelines state in Appendix F, para F8: *“However there are some situations where meeting a set ADF target value with new development in place could be appropriate as a*

criterion for loss of light...when the existing building is proposed, but not built. A typical situation might be where the neighbouring building has received planning permission, but not yet built.” In this case, the use of ADF is considered acceptable for this application.

- 6.7.64 Based on applying the ADF principle to Blocks E and F located in Plot D7, this demonstrates that ADF compliance is broadly the same as that presented in the consented reserved matters planning application. On this basis, the effect of the proposed development is considered to be negligible. There is no material difference to the sunlight levels for these two blocks from the results shown and therefore there would be no significant impact in this regard.
- 6.7.65 In terms of Plot A1, 43 out of 52 rooms tested would meet the respective ADF target. 4 bedrooms that do not meet the 1% ADF target, would achieve values between 0.8% and 0.9%. Given this is marginally below the target value, the impact is considered to be acceptable. 5 open plan living/ kitchen/ dining (LKD) rooms fall below the 2% ADF target for kitchens. However, as these are open plan and would largely be used as a living room, an ADF of 1.5% is considered acceptable. Hence two of these LKD's would meet the target. The remaining LKD's would achieve a target of 1%, however the window serving these rooms are restricted by a protruding flank wall to the south and by balconies above and thus the lower ADF could be attributed to the local detail design. The facing windows face north and as such there would be no impact upon sunlight to these windows. The impact on Plot A1 is therefore considered to be not significant.
- 6.7.66 In terms of Plot A4, of the 70 rooms assessed, 52 rooms achieved their respect ADF target. 12 bedrooms that did not meet their ADF targets are served by windows under balconies. 4 of the 6 below target LKD's have ADF figures of around 1.4%, which is marginally below target. 2 ground floor LKD's achieve ADF's of 0.8% and 1.3%. Whilst not ideal, given the location within an urban development, the shortfall is not significant to warrant a refusal. There would be no impact upon sunlight to these windows.
- 6.7.67 With regards to Plot A5, of the 155 rooms tested, 126 achieve their respective ADF. Given the main constraint on this property is its design features, such as balconies and windows located in internal corners, the impact on this block is not significant. There would be no impact on sunlight to these windows.
- 6.7.68 Finally in relation to Plot C1, 158 rooms were assessed. The ADF compliance for this block is the same as the consented scheme. On this basis the impact would be negligible. In relation to sunlight levels, whilst there will be localised below target sunlight levels, these will be similar to those predicated in the consented scheme.

Conclusion

- 6.7.69 In conclusion, the retained daylight levels to each building will be reasonable for an urban location and as such the proposed development will not have any impact upon the future occupiers of these neighbouring consented schemes.

6.8 Housing Provision and Affordable Housing

6.8.1 The relevant policies are:

NPPF: Chapter 5

London Plan: 2.13, 3.3, 3.11 and 3.12

Harrow Core Strategy: CS1.J

Harrow Development Management Local Policies: DM24

Harrow and Wealdstone Area Action Plan: AAP13

Draft London Plan: GG2, H1, H4, H5, H6, H10 and H15

6.8.2 Policy 3.12 of the London Plan seeks the maximum reasonable amount of affordable housing. Draft London Plan policy H5 set out the threshold approach to applications, which at the minimum requires the provision of 35 per cent; or 50 per cent for public sector land where there is no portfolio agreement with the Mayor; or 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses. Along with the Mayor's Affordable Housing and Viability SPG, draft policy H6 sets out the 'threshold approach' to planning applications, whereby schemes that meet or exceed the relevant threshold of affordable housing by habitable room without public subsidy, and meet the Mayor's preferred tenure mix (as set out under draft policy H6 of the London Plan), are eligible to follow the 'Fast-Track Route' set out in the SPG. This means that viability information is not required for assessment and a late stage viability review would not be sought.

6.8.3 Draft London Plan policy H6 sets out the Mayor's preferred affordable housing tenure as at least 30 per cent low cost rent (either as London Affordable Rent or Social Rent), at 30 per cent intermediate products (either London Living Rent and London Shared Ownership) and the remaining 40 per cent to be determined by the borough as low cost rented houses or intermediate products.

6.8.4 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. The current London Plan policy 3.11A sets out that 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). The Councils Planning Obligations SPD also sets out a preferred tenure split as 60:40 in favour of affordable rent.

6.8.5 Following discussions with the applicant, some of the floor plans originally proposed for the affordable rented units have been revised to ensure that majority of these units achieve maximum occupancy levels in order to meet local housing needs. This has resulted in a reduction to the final quantum of units to be provided on the site. The total number of units is now 1226, from 1238 as originally proposed, a reduction of 12 units. The applicant is proposing 35 per cent of the homes (by habitable room) to be affordable housing without grant, and 40 per cent (by habitable room) is proposed as affordable housing with grant. Accordingly, as the proposal qualifies for the 'Fast-Track Route' approach, a viability appraisal is not required in this instance.

- 6.8.6 The Mayor's Stage 1 response acknowledges that Hyde Group form part of the joint venture that form Harrow View LLP and who is a strategic partner of the GLA and whom have successfully sought grant funding for the additional 5 per cent to increase the level of affordable housing to bring the total provision to 40 per cent.
- 6.8.7 The proposed tenure split, 40 per cent (equating to 507 habitable rooms) is proposed as intermediate housing comprising shared ownership and discount market sales (DMS units), and 60 per cent (equating to 788 habitable rooms) is proposed as low cost rent, which would also include the Extra Care units within the scheme. The tenure split is compliant with the Council's preferred tenure split and would align with the Mayor's preferred mix set out under draft policy H6 of the London Plan.
- 6.8.8 The Council's Housing Enabling Manager is supportive of the proposed tenure split and welcomes the provision of Extra Care units as affordable rent, but has raised some concerns over the proposed bed size mix which is addressed under the Housing Mix section below. The London affordable rent levels set out in the applicant's Affordable Housing Statement for the rented units and the extra care is correct and this would be secured within the section 106 agreement. The affordability for shared ownership and DMS units are acceptable for the 1 bed units, however the Council's Housing Enabling Manager has set out that the average household income benchmark levels for the 2 bed units in both intermediate tenure types are over the benchmark averages. It is considered that such matters can be addressed as part of the section 106 negotiations to ensure that the intermediate tenures are truly affordable products. In addition to this, it would be necessary to ensure that the DMS units remain affordable in perpetuity, or to only release to the open market by agreement with the LPA, following robust marketing and justification, and payment of appropriate affordable housing financial contributions, details of which shall be secured within the section 106 agreement. The section 106 agreement will also secure that 10 per cent wheelchair provision is met in affordable rent and intermediate tenure and in the case of affordable rent, the units are built and ready for occupation as wheelchair homes.
- 6.8.9 In line with draft policy H5 of the London Plan and the Mayor's Affordable Housing and Viability SPG an early stage viability review will be secured within the section 106 agreement to encourage a timely delivery of housing. Subject to agreeing the detailed matters within the section 106 agreement, the level of affordable housing and the tenure mix proposed would be compliant with the policies listed under paragraph 6.8.1 of this appraisal.

Housing Density and Unit Mix

- 6.9.1 The relevant policies are:
NPPF: Chapter 5
London Plan: 3.4, 3.8 and 3.11
Harrow Core Strategy: CS1.J
Harrow Development Management Local Policies: DM24
Harrow and Wealdstone Area Action Plan: AAP13
Draft London Plan: H10

6.9.2 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

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

6.9.4 As noted above, the number of units now to be delivered on the site has reduced from 1238 to 1226. Based on the revised numbers, the development proposes a density of 325 u/ha and 858 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, which must now be given significant weight, 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

6.9.5 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 below:

	Plot D1	Plot D2	Plot D2 (Extra Care)	Plot D4	Plot D5	Plot D6	Total
1b/1p unit	0	86	0	2	3	0	91
1b/2p unit	185	61	58	134	58	65	561
2b/3p unit	96	61	2	112	34	45	350

2b/4p unit	0	0	0	0	0	89	89
3b/4p unit	27	9	0	25	2	0	63
3b/5p unit	2	5	0	6	6	53	72
Total	310	222	60	279	103	252	1226

6.9.6 As discussed above, the proposed housing mix located within Plot D6 and forming part of the affordable rent tenure has been amended in light of the comments raised by the Council's Housing Enabling Manager. The proposed changes results in a slight decrease in the number of 1 Bed units and the number of 2 Bed-3 person units have been drastically reduced and replaced with 2 Bed-4 person units. In addition to this, the 3 Bed-4 person units have been replaced with 5 person occupancy units. The proposed changes are welcomed and whilst the numbers of 1 Bed units still remain high, the overall changes to incorporate maximum occupancy levels of the larger units would help demand for family size homes. In this regard, the revised mix is considered to be acceptable.

6.9.7 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.

6.10 Traffic, Parking, Access, Servicing and Sustainable Transport

6.10.1 The relevant policies are:

NPPF: Chapter 9

London Plan: 6.3, 6.9, 6.13,

Harrow Development Management Local Policies: DM42, DM43 and DM44

Harrow and Wealdstone Area Action Plan: AAP19 and AAP20

Draft London Plan: H15, T2, T4, T6, T6.1, T6.3 and T6.5

Transport Impact

6.10.2 The applicant has provided a transport assessment (TA) to assess the impact of the proposed uplift in unit numbers on this site and the provision of flexible active uses. The application site falls within PTAL 3. Notwithstanding this, there are bus and rail services within a short additional waking distance. Additional cumulative impact assessment has been set out in the applicant's ES.

6.10.3 The proposed development has been assessed against all modes of transports. The TA concludes that the uplift in trips generated by the development will have a relatively low impact on the local highway network. The impacts network-wide and at a strategic level are also considered to be low. However, the Mayor's Stage 1 response, which incorporates TfL comments, sets out that whilst the TA sets out the likely trip generation arising from the proposed development, the TA does not

appear to assess the impact of these trips against observed use of these stations. An assessment of impact on station capacity as well as line loading at these stations should be provided in accordance with policy 6.3 of the London Plan and policy T4 of the draft London Plan. The Council's Highways Authority has also raised similar concerns over station capacity and concurs that an assessment of rail and tube capacity is undertaken.

- 6.10.4 In response to the above comments, the applicant's Transport Consultant has provided a supplemental Technical Note setting out the capacity assessment for both Harrow and Wealdstone and Harrow on the Hill Stations. Based on the data available and applying the likely passenger increase derived from the proposed development, the assessment concludes that in terms of Harrow on the Hill Station, there would be a negligible increase in passenger numbers. At Harrow and Wealdstone Station there would be a minor increase in passenger numbers and therefore the impacts would be considered negligible. The Council's Highways Authority has reviewed this supplemental information and has no further comments to add in this regard. TfL are yet to provide a formal response on the updated TA, however, it is anticipated that this would be forthcoming under the Stage 2 referral.
- 6.10.5 In addition to the above, in assessing the impact of the proposed development upon bus services, the TA states that a total of 88 bus trips during the AM peak and 73 during the PM peak. TfL has set out in the Mayor's Stage 1 response that the buses that serve the site need to be enhanced to meet the extra demand from this development and have requested a financial contribution of £900,000 to fund two extra peak services on H9, H10 or H14 for a period of 5 years. This is to ensure that extra bus capacity is in place prior to occupation of this phase to support forecast bus demand as main mode and facilitate access to Harrow on the Hill.
- 6.10.6 The applicant's Transport Consultant has provided a response to the requested financial contribution setting out that there is already a bus service subsidy secured in the section 106 agreement relating to the wider Harrow View East site (£425,636) and the varied section 106 agreement relating to Harrow View West site (£75,690). The applicant contends that the two existing contributions will achieve the stated need for funding the two extra peak services and that the contribution now being sought would not appear to be in line with the scale of the additional impact derived from the up lift in numbers. In response TfL have requested the applicant to confirm the latest position on the outline planning permission (P/2165/15) bus provisions and that bus colleagues can agree to adjust this figure once this has been confirmed. Based on this, the requirement for bus service contributions has been included under the heads of terms. It is considered that the amount of contribution would be agreed through the Stage 2 process. Subject to the inclusion of bus service contributions, it is considered that the impacts of the proposed development on existing bus infrastructure can be sufficiently mitigated.

6.10.7 The TA includes an assessment on Active Travel Zones (ATZ) which is welcomed. The Council's Highways Authority takes note of these and confirms that where possible, the improvements identified in the ATZ assessment will be implemented using agreed s.106 contributions or CIL finding. This includes a contribution of £127,770 secured for the underpass improvements to the railway bridge to enhance the linkage between the site and the town centre and a contribution of £24,944 towards 'Legible London' wayfinding signs. The Mayor's Stage 1 response sets out that the links to the stops on Headstone Drive and Harrow View need to be included in the ATZ. The applicant has re-issued this information to TfL for their consideration. It is expected that a formal response on this matter would be forthcoming through the Stage 2 process. Officers consider that the applicant has provided sufficient information in respect of the ATZ assessment.

Access and Street Layout

6.10.8 Given the position of the subject site, there is no direct route to the site that currently exists, other than construction access from Harrow View. Once other parts of the wider masterplan are built out vehicle access to the proposed development will be taken from the Primary Street (referred to Avenue North and Avenue South in the appraisal) which will connect through Zone A of the wider masterplan to the south towards Headstone Drive and north through Plot C1 of the wider masterplan site towards Harrow View. It is most likely that this Primary Street will be adopted by the Council's Highways Authority and as such this route has been designed with this in mind.

6.10.9 The other streets within the proposed development would be privately owned and managed by the applicant. Swept-path analysis has been under of the internal highway network and parking areas with a standard design vehicle. The TA contends that a road safety audit is not required, given that it is anticipated that the proposed internal roads would have relatively low vehicle movements per hour and would be designed with narrow carriageways. However, the Council's Highways Authority has stated that the road widths on the unadopted sections of highway look very narrow at some points eg. residential street C outside D 4.1 and the play area. These should ideally be increased to a minimum of 4.8m in width and that a road safety audit is carried out now as it may be too late to change the design later in the process.

6.10.10 Following the above comments, the applicant's Transport Consultant has provided a Stage 1 Road Safety Audit for the proposed development. This sets out a number of safety recommendations to improve the safety for all highway users. The applicant has accepted the recommendation and the changes would be incorporated as part of the detailed design stage. The Council's Highways Authority is content with this approach and details will be secured by condition.

Car/ Motor Cycle Parking

6.10.11 It is noted that the wider masterplan has set a combined ratio of 0.33 spaces per dwelling, with the lowest ratio of 0.11 consented on Plot A3.

- 6.10.12 The subject site forms part of an Outer London Opportunity Area (Harrow & Wealdstone), the maximum car parking standard is 0.50 spaces per dwelling based on policy T6.1 of the draft London Plan. The proposed development would provide a total of 371 parking spaces for residents, which provides a parking ratio of 0.30 spaces per dwelling, including the 60 extra care dwellings. In line with policy T6.1, 3 per cent of dwellings will have designated accessible parking spaces from the outset. If demand necessitated, the additional 7 per cent of accessible parking (bringing the total to 10 per cent accessible parking) could be provided in the future through replacement of standard spaces within the podiums. This would be in line with policy T6.1 of the draft London Plan. Residential parking will be prioritised to larger family dwellings (2 and 3 Beds) on a first come, first served basis. Any remaining parking would then be made available to studios and 1 Bed dwellings, beyond the 3 per cent accessible parking for these units. The Mayor's Stage 1 response sets out that the parking ratio proposed is acceptable, however, has requested that the Council secure a Parking Design and Management Plan which details how cycle parking (discussed further below) and car parking will be managed and in line with draft policy T6.1 parking spaces should be leased rather than sold, to ensure the land take up is used as efficiently as possible over the life of a development. A condition is recommended to this effect.
- 6.10.13 In line with draft policy T6.1 the 20 per cent of the spaces will have active electric charging facilities, with passive provision for all remaining spaces.
- 6.10.14 The proposal would include 8 parking spaces for motorcycle spaces, located within the podiums of Plots D1, D2 and D4. Policy DM42 sets out that 1 motorcycle parking per 20 car parking spaces should be provided to all developments with more than 10 car parking spaces. Based on the quantum of parking proposed, this would require a quantum of 18 motorcycle spaces to be provided for this development. Whilst the quantum proposed does not meet this requirement, having regard to the site constraints and the fact that the proposal would meet the required parking standards and cycle parking standards, the short fall in motorcycle parking spaces would not warrant a refusal. As such, the quantum proposed is acceptable.

Cycle Parking

- 6.10.15 Cycle parking requirements are based on the minimum standard set out under policy T5 of the draft London Plan. The proposal would provide 2,017 long stay cycle parking and 36 short stay cycle parking. 5 per cent of the total long stay provision (103 spaces) will be in form of Sheffield Stands with space for larger and adapted cycles. Two tier racks will be proposed for the remaining cycle parking.
- 6.10.16 All long stay cycle parking will be provided in secure and covered locations in line with policy T5 of the draft London Plan and the London Cycling Design Standards. All short stay cycling will be situated within the public realm in visible, convenient locations, which will be step free and within 15m of the main entrance of their allocated residential core or non-residential unit.

6.10.17 For the Extra Care block, 4 long stay staff spaces within the secure courtyard and 15 mobility scooter spaces are proposed as opposed to cycle parking. The Council's Highways Authority has stated that ideally residents within this block should also be given the opportunity to have cycles should they wish to. Assuming that all of the future residents would not be able to cycle is not in the spirit of an extra care facility as the intention is to allow residents to live independently but with support as and when required; this means that some quite able residents but with declining health needs are likely to reside in this type of accommodation. This development is meant to promote sustainable travel to all. The applicant's Transport Consultant had provided a response to this affect and has set out that as the ratio of mobility scooter provision for this block would exceed the 15% recommend in a GLA report '*Accessible design features in specialist older persons housing: Report to the Greater London Authority – assessing potential demand for and provision of wheel user dwellings M4(3) and ancillary facilities in specialist older persons housing in London*' (2018), it would be practical to use this space more flexibly with provision of spaces for any cycle storage requirement for occupiers of the Extra Care units. These spaces would have electric charging opportunities which could be particularly relevant to elder cyclists. The Council's Highways Authority is content with this. Details for this and for the proposed cycle racks can be conditioned.

Travel Plan

6.10.18 The applicant has submitted a framework travel plan in support of the residential element of the proposed development. This is yet to be reviewed by the Council's Travel Planner. If any amendments are required these will be sought prior to any formal decision being made. Notwithstanding this, a detailed travel plan for each phase of development would be secured through the section 106 agreement along with any associated cost for the monitoring these travel plans, if such has not been already secured under the principle section 106 agreement relating to the wider masterplan site.

Car Club

6.10.19 The applicant's TA sets out that there would be provision made for two car club spaces for the proposed development. These would be provided on the Primary Street (Avenues North and South) and will be secured within the s.106 agreement. This is considered acceptable.

Deliveries and Servicing

6.10.20 An outline Delivery and Servicing Plan has been provided in support of this application and appended to the TA. This sets out that service vehicles will access the same routes as private cars and that majority of delivery and servicing activity will take place from the carriageway rather than formalised loading bays as to maximise footway provision and public realm. However, five loading bays will be provided across the proposed development in support of deliveries and waste collection. In line with policy H15 of the draft London Plan, the loading bay situated adjacent to the D2 Extra Care plot would also serve as a pick-up and drop-off facility suitable for mini-buses and ambulances.

- 6.10.21 The supporting DAS states that the refuse strategy has been developed through discussions with the LBH's Waste and Recycling Services Team and is based on the LBH's 'Code of Practice for storage and collection of refuse and materials for recycling in domestic properties' (2016). No formal comments have been made by the LBH Waste Team. However, Officers have contacted the Waste Team for their comments, the outcome of which will be reported by addendum.
- 6.10.22 Emergency Vehicles has been considered in the design of the proposed development. Fire tender vehicles are able to stop within 18m of each external riser inlet and clear routes have been provided to ensure unobstructed access in the event of an emergency.
- 6.10.23 The outline strategy is considered acceptable. A detailed delivery and servicing will be secured by condition.

Conclusion

- 6.10.24 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 policies stated under paragraph 6.9.1 above.

6.11 Development and Flood Risk

- 6.11.1 The relevant policies are:
- NPPF: Chapter 14
 - London Plan: 5.12 and 5.13
 - Harrow Core Strategy: CS1 U
 - Harrow Development Management Local Policies: DM9, DM10 and DM12
 - Harrow and Wealdstone Area Action Plan: AAP9
 - Draft London Plan: SI 12 and SI 13

Flood Risk

- 6.11.2 The applicant a Flood Risk Assessment (FRA) for this site. The entirety of the site and surrounding areas are shown to be within Flood Zone 1 i.e. land having a less than 1 in 1,000 annual probability of fluvial or tidal flooding. The FRA confirms that there is negligible risk of tidal flooding.
- 6.11.3 Wealdstone Brooke and Yeading Brook are located to the east and northwest of the site respectively. Based on the EA's Flood Risk from Surface Water mapping, the site is considered to be at low risk of fluvial flooding.
- 6.11.4 The EA's Surface Water Flood Risk mapping shows that majority of the site to be at 'low risk' of surface water flooding. However, there are some isolated areas of potential surface water flooding shown within the site. The FRA states that these areas are isolated and the proposed surface water drainage system will reduce the risk of such potential water flooding/ ponding. Further, the slight gradient across the site means that any overland flows will be directed from the site. The FRA concludes that the site will be at low risk of surface water flooding. In addition, the FRA concludes that the site is at low risk of groundwater flooding. In order to afford the site addition protection from any potential 'residual' flood risk, finished

floor levels will be set a minimum 'standard' of 0.15m above adjacent infrastructure thoroughfare levels.

- 6.11.5 The FRA has been reviewed by the Council's Drainage Authority and they have stated that the Council's requirements have changed since the publication of the new SFRA in 2018 and now Compensatory Flood Storage (CFS) is required for loss of floodplain in zone 3a and 3b. Previously it was only required for loss of functional floodplain (zone 3b). The site has localised flooding that should be addressed in the FRA. Compensation for all ground levels raised or buildings constructed in zone 3a and 3b should be provided on level for level and volume for volume basis by gradually lowering ground levels, with flood water flowing freely out of the lowered area when flooding recedes. The CFS should be positioned outside of (and contiguous with) the flood zone wherever possible. The minimum volume of CFS to be provided will equate to the volume of flood water displaced by the proposed development. The Council's Drainage Authority has stated that CFS should be designed for a worst case scenario therefore the highest flood depth should be considered. i.e. the upper limit for each depth banding on the available flood map data. This information needs to be provided from the onset and cannot be conditioned.
- 6.11.6 Accordingly the Council's Drainage Team have stated that the applicant should submit the following details:
- location of proposed CFS on plan;
 - calculations for volume of compensation storage required; and
 - cross section of the proposed compensatory flood storage with levels of the existing and proposed / lowered ground level in relation to the finish floor level.
- 6.11.7 In addition to the above information, the finished floor levels of the new buildings should be raised 300mm above flood level and as such revised drawings to this effect should be provided.
- 6.11.8 In response to the above, the applicant's Drainage Consultant has provided a Technical Design Note in response to the above LBH comments, which sets out that the proposed surface water drainage system for the site already provides an appropriate form of surface water 'compensatory flood storage', with no further compensation therefore considered necessary. Furthermore the proposals would include 'rain gardens' and other soft landscaping which will provide additional form of surface water 'compensatory flood storage'. The provision of a surface water drainage system designed to ensure there is no on-site water flooding post development would negate the need to raise floor levels 300mm above the flood level.
- 6.11.9 The Council's Drainage Authority confirms that the Technical Note produced is not sufficient. Policy DM9 of the DMP, policy AAP9 of the AAP and the SFRA require that appropriate flood mitigation should be incorporated for all major schemes. As such, Officers have requested that appropriate CFS is provided on site, given that this is one of the largest urban projects. In addition, the finished floor levels should be raised 300mm above the flood level. At the time of writing this report, the applicant's agent has confirmed that the Drainage Consultant is reviewing the

additional comments with the view to addressing the points raised and providing the requested information. An update on this will be provided via the addendum.

6.11.10 Subject, to the applicant providing satisfactory CFS and the required finished floor levels, it is considered that the proposal would be satisfactorily safeguarded against any risk of flooding on site and thus satisfying the requirement of the policies set out under paragraph 6.10.1 above. In addition, the Mayor's Stage 1 response raises no concerns with the submitted FRA.

Drainage Strategy

6.11.11 Policy 5.13 requires a surface water drainage network to utilise sustainable urban drainage techniques, discharging surface water at greenfield runoff and managing surface water as close to source as possible in line with the drainage hierarchy set out under this policy. The applicant has submitted a Drainage Strategy (DS) which has been developed in accordance with policy 5.13 of the London Plan and policy SI 13 of the draft London Plan.

6.11.12 The DS in line with the hierarchy will include storage water for later use by way of green roofs and rain gardens; will provide attenuation in open water features for gradual release; will attenuate by storing in tanks or sealed water feature for gradual release and discharge to surface water sewer at an agreed gradual release. The proposal will not include any infiltration techniques as the site is not suitable for this due to the underlying clay.

6.11.13 The proposal will include the following SUD's feature:

- swales/ pond;
- rain gardens;
- permeable parking; and
- green roofs.

6.11.14 Foul water is to be discharged by gravity into Harrow View and Hailsham Drive Thames Water Sewers. At the time, the DS was produced, Thames Water were undertaking further modelling for the foul drainage in the area, with the aim of reinforcing their network with the requirements of the site. Thames Water in their formal consultation response to the LPA have stated that they do not have capacity for these plots or the wider Kodak Site development. Modelling is being undertaken by Thames Water and the phasing of the Kodak Site shows there will be no occupation until September 2022. Thames Water's current program indicates that they will have completed reinforcement works for the whole of the Kodak Development site by the end of December 2021. As a result of this Thames Water do not raise any concerns. If the phasing plan that has been provided was to be incorrect or to change then Thames Water would need to be contacted and concerns would be raised as our program of works has been planned out and Thames Water will only have capacity once the works are completed. On this basis, it is considered that subject to the planned reinforcement works are undertaken in line with the programme set out above, the proposed development would not result on any capacity impact upon the drainage infrastructure.

6.11.15 The Council's Drainage Authority has confirmed that the DS submitted is satisfactory. However further detailed drainage design in line with the Council's standard drainage requirements should be submitted to include surface water disposal, foul water disposal and surface water attention and storage. On this basis, appropriate drainage conditions have been recommended. The Mayor's Stage 1 response sets out that the proposed drainage strategy would generally satisfy the requirements of policy 5.13 of the London Plan and policy S1 13 of the draft London Plan.

Conclusion

6.11.16 In summary, subject to the applicant submitting acceptable CFS details, acceptable finished floor levels and the imposition of appropriate drainage conditions, it is considered that the proposal would be acceptable with regards to the policies listed under paragraph 6.10.1 above.

6.12 Ecology and Biodiversity

6.12.1 The relevant policies are:

- NPPF: Chapter 15
- London Plan: 7.19
- Harrow Development Management Local Policies: DM20 and DM21
- Harrow and Wealdstone Area Action Plan: AAP12
- Draft London Plan: G6

6.12.2 The applicant has submitted a Biodiversity Statement in respect of this application. This sets out a number of recommendations following an ecological walkover survey which was undertaken on the 7th March 2019. Recommendations include: biodiversity enhancement measures to be incorporated into the landscaping of the proposed development; safe passage for terrestrial mammals; protection for nesting birds and avoidance any vegetation and building clearance during bird nesting season; minimising light spillage to encourage foraging and commuting bats; careful removal of invasive cotoneaster and butterfly bush and the submission of a Construction Ecological Management Plan.

6.12.3 Whilst the recommendations set out in the Biodiversity Statement are noted, this application has to be considered in context of the wider masterplan site which already has appropriate safeguards in place via planning conditions attached to the outline permission granted under P/2165/15. This included the requirement to provide up to date bat and breeding bird surveys, the details of which have been subsequently been approved under application P/5628/17 for the entire Zone D site. Furthermore, Phase 2 demolition works is fully underway which includes the removal of the remaining factory buildings and ground clearance for the former factory site. In this regard, the only recommendations that need to be taken forward in relation to this application relate to the provision of biodiversity enhancement measures and controlling light spillage. On this basis, suitable conditions, similar to those used site wide are recommended.

Conclusion

- 6.12.4 Subject to the imposition of the conditions recommended above, it is considered that the proposal development would meet the aspirations of the policies listed under paragraph 6.11.1 above.

6.13 Sustainability and Climate Change Mitigation

- 6.13.1 The relevant policies are:

- NPPF: Chapters 2 and 14
- London Plan: 5.1, 5.2, 5.3, 5.4A, 5.7, 5.9, 5.10, 5.11, 5.15, 5.18, 7.6 and 7.7
- Harrow Core Strategy: CS1 T
- Harrow Development Management Local Policies: DM1, DM12, DM13 and DM14
- Harrow and Wealdstone Area Action Plan: AAP4, AAP6 and AAP10
- Draft London Plan: D7, D8, G5, S1 2, SI 3, S1 4, SI 5 and SI 7

Energy and Sustainability

- 6.13.2 The applicant has submitted an Energy & Sustainability Statement (revision 6, dated 3 September 2019) prepared by O'Connor Sutton Cronin (OCSC).

- 6.13.3 In broad terms, under Policy 5.2 of the current London Plan, all development is expected to achieve at least a 35% reduction in carbon emission through on-site measures. Any remaining residential carbon emissions are to be offset by way of monetary contribution to ensure that the residential element of the development is zero carbon.

- 6.13.4 The statement outlines how carbon emissions from the development are proposed to be reduced to achieve at least a 35% on-site reduction for both residential and non-residential uses. Additionally, it identifies that a monetary contribution will be made to offset any remaining carbon emissions from the residential element in order to achieve zero carbon residential development. These broad targets and approaches reflect the requirements of the current and draft London Plan. The strategy indicates that the residential element of the development will achieve a 57.03% on-site reduction in carbon emission and the non-residential element will achieve a 40% reduction. The combined reductions are 56.4%. These reductions are in excess of the 35% required under the draft London Plan. After on-site reductions, residential carbon emissions will be 535.8 tonnes per annum resulting in a zero carbon offset contribution of £964,436.

- 6.13.5 The statement follows the energy hierarchy as required by the London Plan, namely to reduce energy demand ('Be Lean'), supply energy efficiently ('Be Clean'), and finally, use low and zero carbon technologies ('Be Green').

- 6.13.6 In terms of reducing energy demand/ energy efficiency, the statement outlines that the development will include enhanced building fabric performance for walls, floors, roofs, windows and air permeability compared to the minimum requirements under the Building Regulations 2013. In addition to these 'passive' measures, 'active' measures proposed include lower energy light fittings, enhanced lighting controls, variable speed pumping on all district heat network distribution pumps,

improved heating controls, high efficiency boilers and control systems, and occupant / daylight control of lighting (non-residential). These measures produce carbon savings of circa 13.9% for residential element (compared to 10% target under draft new London Plan – Policy SI2 Minimising greenhouse gas emissions) and circa 36.4% for non-residential element (compared to the draft 15% target). These reductions and the overall reduction achieved through energy efficiency measures of 11.27% are welcomed.

- 6.13.7 In terms of the next stage of the energy hierarchy (supplying energy efficiently), the application proposes to connect the site to the heat network serving the wider part of Harrow View East being developed by Barratts / Hyde (i.e. Plot D7 – under construction), B1 and C1. This is the same arrangement as if the subject site was being developed in accordance with the outline permission granted in 2015 (P/2165/15) and covered by the energy strategy approved under Condition 8 of that permission. The energy centre to which the subject application will be connected to is already under construction on Plot D8, being required to be completed in time to provide heat to the residential units on Plot D7, the first of which are due to be completed by the end of 2020. The proposal to connect to existing or planned heat networks is also consistent with Harrow Local Plan Policy AAP10: Harrow & Wealdstone District Energy Network.
- 6.13.8 The energy centre under construction to which it is proposed to connect the development includes a Combined Heat and Power (CHP) engine, which produces both heat and electricity locally. During the pre-application process, the GLA raised concerns about the proposal to connect to a network where heat is provided by a CHP engine. This is because new carbon factors due to be incorporated into the Building Regulations mean that the carbon savings achieved through the production of electricity locally by way of a CHP engine are less than under the current Building Regulations as the carbon intensity of electricity provided by the National Grid has decreased significantly due to increased renewable energy production nationally (i.e. offshore wind farms).
- 6.13.9 Consequently to use the new carbon factors (that are not yet incorporated into the Building Regulations) as suggested by the GLA would mean that the proposal would (a) be unlikely to meet the on-site carbon reduction requirements, or (b) the CHP proposed to serve the heat network under construction would need to be replaced with a lower carbon technology (i.e. air source heat pumps) to achieve the required carbon reductions using the ‘new’ carbon factors, or (c) a new strategy / heat network would be required for the subject site and this would operate separately to the network under construction.
- 6.13.10 From the LPA perspective, whilst (a) is not preferable, it needs to be acknowledged that for large schemes such as the former Kodak site, policy requirements and calculation methodologies can change over the extended period of the development and it is not always practical nor reasonable to ‘change the goal posts’ during this time. This is particularly the case where a development is seeking to go beyond the original outline permission (with an agreed energy strategy using CHP) in order to make better use of the site / provide more housing, therefore requiring a full planning permission that is referable to the Mayor. In terms of (b), as the proposed heat network / energy centre is already under

construction and is part of the critical path for occupation of the first residential units on Plot D7 (due to completed end 2020); the applicant has asserted it is not feasible to re-design / re-tender the energy centre under construction. This assertion is considered reasonable by the LPA. In terms of (c), an entirely new heat network serving the subject site (i.e. separate to the rest of the Barratts / Hyde site) would be contrary to the London Plan requirement to connect up to existing heat networks and would put the sustainable operation of the heat network already under construction at risk as it was designed / sized to serve the subject site and would therefore be under-utilised. The proposed approach of connecting the subject site to the heat network serving the broader site is therefore considered acceptable. It is noted that use of the proposed carbon factors in calculations is 'encouraged' by the GLA but cannot be reasonably mandated as they are not yet part of the Building Regulations.

- 6.13.11 The GLA Stage 1 response raises the potential connection of the development to a broader district heat network. In this regard and consistent with Policy AAP10, the Council has been investigating the potential for a broader district heat network serving the Harrow and Wealdstone Opportunity Area. An Energy Masterplanning process concluded a network serving the entire Opportunity Area was not financially feasible. It concluded that a network serving the main Council / private development sites in Wealdstone was both technically and financially feasible. The investigations included potential connection of the Kodak site to the network but concluded this was not economically advantageous. Consequently at present there is no broader district wide network proposed that could serve the subject site but future connection to one should be safeguarded by way of the section 106 agreement.
- 6.13.12 The energy statement considers low and zero carbon technologies (i.e. renewable energy) as the Be Green final stage of the energy hierarchy. A range of technologies are considered and solar PV panels are proposed as a result of the assessment. This conclusion / recommendation is considered reasonable given the urban nature of the proposal (precluding biomass / wind turbines) and the proposed connection to a CHP (precluding solar thermal / hot water and heat pumps as these would 'compete' with the CHP for heat demand). The proposal is for a PV array of 394.6 kWp on the higher roof areas of the proposed development (to avoid shading). The panels will achieve a 14.2% reduction in carbon emissions (residential) or 13.71% (total development), which is considered positive.
- 6.13.13 As a result of the above, total carbon emissions from the site will be reduced from 1,291 tonnes per year to 562.8 tonnes, representing a 728.2 tonne or 56.39% reduction. Carbon emissions from the residential element of the development will be 535.8 tonnes. To achieve zero carbon, these emissions need to be offset through a monetary contribution to implement carbon reduction measures elsewhere in the borough. This contribution is calculated at a rate of £60 per tonne of carbon to be offset per year, over a 30 year period (i.e. £60/tonne/per year x 30 years = £1,800 per tonne). 535.8 tonnes of carbon needs to be offset, equating to £964,436 (535.8 tonnes x £1,800). This contribution should be secured by way of a S106 contribution, payable upon commencement of each phase and verified once each phase is completed and the actual / as-built carbon emissions known. Any shortfall in carbon reductions (i.e. if actual emissions are greater than

expected) will result in an additional offset contribution calculated at a rate of £1,800 per tonne.

- 6.13.14 The GLA Stage 1 response identifies a number of technical issues. Some of these (i.e. the CHP-led heat network / broader district heat network) are addressed above (from an LPA perspective). Other issues are detailed submission of revised calculations etc that will not impact upon the overall strategy and should be able to be addressed by way of a revised energy strategy / addendum prior to any permission being granted, or secured by way of condition.
- 6.13.15 Given the above, it is considered that the proposed energy strategy follows the energy hierarchy as required by the London Plan. It achieves greater on-site carbon reductions than the minimum 35% required under the London Plan (56.4% residential / non-residential). The proposed connection to an existing (under construction) CHP-led heat network is considered acceptable given the history of the site and its ongoing development. Solar PV as a form of renewable energy is considered appropriate to the site. Any remaining residential carbon emissions will be offset by way of a monetary contribution, secured through s106 agreement. Implementation of the energy strategy should be secured by way of condition, with the development to be implemented 'generally in accordance with' the strategy to allow some flexibility as the scheme progresses through detailed design and construction phases.

Water Efficiency

- 6.13.16 The Energy and Sustainability Statement also outlines a number of broader sustainability measures, including water efficiency. In this regard, it proposes that all dwellings will be designed so that maximum water consumption is 105 litres per person per day. This is consistent with London Plan Policy 5.15 and draft New London Plan Policy S15 Water Infrastructure (excluding an allowance of 5 litres or less per head per day for external water consumption). This should be secured by way of condition.

Overheating

- 6.13.17 In assessing overheating the applicant has submitted an Overheating Risk Analysis Report.
- 6.13.18 The London Plan, both in its current form and draft seeks to ensure to minimise impacts on the urban heat island through design, layout, orientation, materials and incorporation of green infrastructure. Major developments through their energy strategy should demonstrate how the development will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy set out under policy 5.9 and draft policy S1 4.
- 6.13.19 The risk analysis has been carried out in accordance with the recommended best practise CIBSE (Chartered Institution of Building Services Engineers) TM52 and TM59 methodology. The analysis concluded that all communal corridors analysed in the baseline design model achieve compliance with CIBSE TM59 criterion, however some bedrooms and living/ kitchen/ dining rooms of sampled plots of West/ South-West facing elevations with no shading from neighbouring buildings on the basement design model fail to achieve compliance with the criterion. In

order to mitigate the effects of excessive solar heat gains on the West/ South-West facing elevations, and achieve compliance for those rooms, an enhanced glazing g-value of 0.36 is recommended and is proposed to be included where required. Non-domestic areas indicate similar conclusions. To mitigate the effects of excessive solar gains, enhanced glazing as above is recommended on the West/ South-West facades. A condition is recommended to this effect to ensure further details are submitted in this regard.

Wind Microclimate

- 6.13.20 In view of the taller buildings proposed on this site, a Wind Microclimate assessment has been undertaken and forms Chapter 10 of the ES. To predict the local wind environment associated with the completed development, and the resulting pedestrian comfort within and immediately surrounding the site, wind tunnel testing of the proposed development has been undertaken. This is the best method of quantifying and classifying in accordance with the widely accepted Lawson Comfort Criteria. A 1:300 scale model of the existing site and the surrounding area within a 360m radius of the entire site was constructed. A scale model of the building comprising the proposed development has also been constructed.
- 6.13.21 The wind tunnel testing of the wind microclimate at the proposed development identified wind conditions that could result in significant adverse effects and instances of strong winds, and suggests wind mitigation measures to eliminate these effects. The areas that were tested for wind comfort levels included, thoroughfares, entrances, amenity spaces and private balconies and terraces. The proposed development was tested with and without landscaping, as well as additional mitigation that included replacing a number of trees to be evergreen, increasing balustrade heights and planting associated with Plot D7.
- 6.13.22 In relation to the completed development, mitigation measures at required a 6 tested locations for comfort, and 6 locations for safety. Such measures have been developed through wind tunnel testing to improved wind environment relative to the intended uses of the site. The originally proposed landscaping scheme provided some mitigation, however further mitigation was required as strong winds remained in 2 locations. Further mitigation included the replacement of a deciduous tree in Plot D5 with an evergreen, and the introduction of approximately 30-40% porous balustrade at balcony location 241 on Plot D6.
- 6.13.23 Further wind testing was undertaken to take into consideration the cumulative impact of surrounding buildings located on the wider masterplan site. This did not significantly impact upon the results already produced for the development site.
- 6.13.24 In conclusion, with the implementation of the landscaping and mitigation measures set out in the ES, there would be no significant effects from the proposed development either on its own or cumulatively. On this basis, the proposal is considered to be acceptable with regard to the relevant policies set out under paragraph 6.12.1 of this appraisal.

Urban Greening

- 6.13.25 Policy 5.10 of the London Plan sets out that development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include tree planting, green roofs and walls, and soft landscaping. A target of 0.4 for residential development should be achieved in line with policy G5 of the draft London Plan.
- 6.13.26 The proposed development in isolation would achieve an Urban Greening Factor of 0.26. This is largely due to the significant road and street network associated with the proposed development. When taking into consideration the green link located in the wider masterplan this increase to 0.3. The proposed development seeks to maximise the area of green roofs, improve surface water management and enhance biodiversity.
- 6.13.27 The Mayor's Stage 1 response sets out that the Urban Greening Factor should be improved through possibly the inclusion of intensive green roofs and replacement of areas of amenity grassland for flower-rich grassland. Officers consider that whilst the proposal does not fully achieve the desired Urban Greening Factor, overall the development does provide a generous green link and other small pockets of green space both within the current site and on the wider masterplan site. As such, Officers consider the proposals to be acceptable in this regard.

Site Waste Management

- 6.13.28 The applicant has submitted a Site Waste Management Plan (SWMP) in support of this application. This sets out the applicant's commitment to provide a detailed SWMP at construction phase and that the document currently submitted is a 'Live Document' and will be updated before the enabling works commence. It is noted that the applicant has already submitted SWMP's in respect of the wider masterplan site and which also included the enabling works phase 4 relating to Plot C2 and D1-D6.
- 6.13.29 Whilst the demolition works are already underway on site, condition 23 attached to the original outline permission P/2165/15, also required details with regards to the storage of materials, materials procurement, and designation of a Waste Champion, and the provision of an on-site Waste Management entre. As the submitted SWMP only provides the framework to what would be included in the SWMP, it is considered necessary to attach a condition similar to that previously attached to the outline permission, in order to meet the objectives of policy 5.18 of The London Plan to reduce waste arising from construction phase of the development.

6.14 Land Contamination and Remediation

- 6.14.1 The relevant policies are:
- NPPF: Chapter 15
 - London Plan: 5.21
 - Harrow Core Strategy: CS1
 - Harrow Development Management Local Policies: DM15

- 6.14.2 The applicant has submitted a Ground Investigation Report and Remediation Method Statement to support this application. Both reports formed part of the submission of application P/1347/18, which was submitted 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. Both reports set out that no further desk based assessment or ground investigation works have been undertaken in the intervening period and that the overarching conclusions and remedial measures detailed within the original 2018 reports remain unaltered and valid.
- 6.14.3 The detailed pursuant condition 27 of P/2165/15 have been approved for the land covering Zones B to D of the wider masterplan site, to which this current application site falls within (Zone D). As such, 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. Subject to these conditions, there would be no conflict with the policies set out under paragraph 6.13.1 of this appraisal.

6.15 Air Quality

- 6.15.1 The relevant policies are:
- NPPF: Chapter 15
 - London Plan: 7.14
 - Harrow Development Management Local Policies: DM1
 - Draft London Plan: SI 1
- 6.15.1 The applicant has submitted an Air Quality Assessment (AQA) as part of their ES (Chapter 8) which assess the impact of the development during construction phase and completion stage on air quality on the surrounding area and within the development itself and future residents of the site.
- 6.15.2 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.
- 6.15.3 In terms of potential effects during construction, the main emissions are likely to be dust and particulate matters generated during earth movement or from construction materials. However, with appropriate mitigation by way of appropriate duct suppression methods, the impact would have a neutral impact on the surrounding areas. The AQA states that the impact of construction traffic will not be significant and so as not been included in the AQA.

- 6.15.4 The desktop assessment identifies that any additional traffic movements are likely to be the most significant local source of pollutants from the proposed development and its surroundings. The effects of this was modelled as part of the AQA and the conclusions drawn from this assessment conclude that the mean Nitrogen Dioxide emission and Particulate Matter (PM₁₀ and PM_{2.5}), concentrations at surrounding existing receptors from the effects of increased traffic and traffic flows associated with the proposed development is predicted to be neutral at all identified receptors. As such, any impacts are considered to be negligible and not significant. In this regard, there is no mitigation required. 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.
- 6.15.5 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.
- 6.15.6 Whilst the Council's Environmental Health Team has not commented in respect of this matter, it is considered that the mitigations suggested in the AQA 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.
- 6.15.7 Overall it is considered that the proposed development will not generate any likely significant effects, either during the construction or operational phases with the implementation of the mitigation measures identified above. As such, there are no air quality constraints arising from the proposed development and there would be no conflict with the policies listed under paragraph 6.14.1 of this appraisal.

6.16 Statement of Community Engagement

- 6.16.1 The NPPF, Localism Act and the Council's Statement of Community Involvement encourage developers, in the cause of major applications such as this, to undertake public consultation exercise prior to submission of a formal application.
- 6.16.2 Prior to the submission of this application, the applicant held two, two day consultation events in March and July respectively. 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. The proposals were also presented at the Council's Major Development Panel in January 2019 and July 2019. The applicant has submitted a comprehensive Statement of Community Involvement which sets out the outcome and feedback from these public events.
- 6.16.3 The Council also sent out letters of consultation to local residents in the surrounding area inviting them to make representations on the proposed development.

6.16.4 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.

6.17 S.106 Obligations and Infrastructure

6.17.1 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 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 Policies Local Plan and the Supplementary Planning Document: Planning Obligations (2013).

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 new public spaces 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 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 (2019), the policies of The London Plan (2016), The Draft London Plan (2019), 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>Save where varied by other planning conditions comprising this planning permission or unless otherwise agreed in writing by the local planning authority, the development hereby permitted shall be carried out in accordance with the following approved plans to show the redevelopment of the site to include the erection of buildings of up to 18 storeys and up to 1,226 residential units together with up to 1,090sqm GIA of non-residential floorspace:</p> <p>Approved Plan: TBC</p> <p>Approved Documents: TBC</p> <p>REASON: For the avoidance of doubt and in the interests of proper planning.</p>
3	<p>Notwithstanding the approved plans, the development hereby approved shall not commence until a Phasing Strategy has been first submitted to, and approved in writing by the local planning authority, setting out how each plot and the buildings within those plots, along with associated streets and landscape works would be delivered. The details shall include appropriate safeguards, if necessary, to be provided for buildings that are ready for occupation whilst construction works continue on other phases of the site and any temporary works that may be required to facilitate access to any buildings/ part of the site. The Phasing Strategy shall, unless otherwise agreed, be implemented as approved. REASON: Due to the quantum of development and the number of plots associated with this development, a Phasing Strategy is required to ensure the development is delivered on an appropriate phased basis and appropriate safeguards are in place during these phased work to protect the amenities of future residents of this site. Details are required PRIOR TO COMMENCEMENT OF DEVELOPMENT to ensure a satisfactory method of construction is agreed prior to any works on site commencing.</p>
4	<p>No development shall take place, including any works of demolition, until a Detailed Construction Logistics Plan has been submitted to, and approved in writing by, the local planning authority in accordance with the format and guidance provided by the Transport for London – www.constructionlogistics.org. The Detailed Construction Logistics Plan shall provide for:</p>

	<ul style="list-style-type: none"> • a) Parking of vehicles of site operatives/visitors; • b) HGV access to site – loading and unloading of plant and materials; • c) Number of HGV's anticipated; • d) Storage of plant and materials used in constructing the development; • e) Programme of work and phasing (in line with the Phasing Strategy to be submitted pursuant to condition 3 attached to this permission); • f) Site layout plan; • g) Highway condition (before, during, after); • h) Measures to control dust and dirt during construction; • i) A scheme for recycling/disposing of waste resulting from demolition and construction works; <p>j) details showing the frontage/ the boundary of the site enclosed by site hording to a minimum height of 2 metres; and</p> <p>k) Details of cranes and other tall construction equipment (including obstacle lighting).</p> <p>The development shall be carried out in accordance with the approved Detailed Construction Logistics Plan, or any amendment or variation to it as may be agreed in writing by the local planning authority.</p> <p>REASON: To minimise the impacts of construction upon the amenities of neighbouring occupiers and to ensure that development does not adversely affect safety on the transport network. Details are required PRIOR TO COMMENCEMENT OF DEVELOPMENT to ensure a satisfactory method of construction is agreed prior to any works on site commencing.</p>
5	<p>Notwithstanding the approved Drainage Strategy, no development in relation to each plot or phase (whichever is relevant) 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 to ensure satisfactory drainage can provided on site to serve the development.</p>

6	<p>Notwithstanding the approved Drainage Strategy, no development in relation to each plot or phase (whichever is relevant) 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>
7	<p>No site works or development in relation to each plot or phase (whichever is relevant) 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>
8	<p>Notwithstanding the details shown on the approved drawings, the development relating to each building, plot or phase (whichever is relevant), 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 vehicle and 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 for each relevant building or plot (whichever is relevant) as noted below shall not progress beyond damp proof course level until:</p>

- a) one x 1:1 scale sample mock-up of buildings D1.1-3, which shall include the two different brick colours proposed, one window opening, the proposed brick pattern, mortar and balcony.
- b) one 1:1 scale sample mock up-of buildings D1.4-5, which shall include, one window opening, the balcony and the proposed brick patterns including the proposed brick mortar.
- c) one 1:1 scale sample mock up-of buildings D2.1 and D2.2, which shall include, one window opening, the balcony and the proposed brick pattern including the proposed two brick mortars.
- d) one 1:1 scale sample mock up-of buildings D2.3 and D2.4, which shall include, one window opening, the balcony and the proposed brick pattern including the proposed brick mortar.
- e) one 1:1 scale sample mock up-of Extra Care Building (Plot 2), which shall include, one window opening with the full composition of the proposed brick blanket pattern around the window, including the proposed brick mortar and concrete sill, and the Juliet balcony.
- f) one 1:1 scale sample mock-up of buildings D4.3, D4.4 and D4.5, which shall include, one window opening with brick soldier detail with surrounding brickwork and the balcony, and sample panel of the proposed white brick with the red brick.
- e) one 1:1 scale sample mock-up of buildings D4.2 and D2.6, which shall include, one window opening, the balcony including the metal fascia and the proposed white brick detail along with the horizontal brick banding pattern including the proposed brick mortar.
- f) one 1:1 scale sample mock-up of Plot D5, which shall include, one window opening two brick piers, concrete banding and the balcony.
- g) two 1:1 scale sample mock-up of Plot D6. One sample in the dark brown brick and the other in red brick. Both samples shall include one window opening, brick soldier course with surrounding brick and the balcony. Details for the dark brick shall include the 6 brick staggered soldier course.

The sample panels listed above shall be erected on site (or at such other location(s) as may be agreed in writing by the local planning authority). The development shall be carried out in accordance with the details, samples and drawings so agreed and shall be retained as such thereafter.

REASON: To ensure that the development is carried out to the highest standards of architecture and materials.

10	<p>The development hereby approved in relation to each relevant Plot that adjoins the Residential Streets shall not progress beyond damp proof course level until a revised street layout in line with the recommendations set out in the Stage 1 Road Safety Audit has been submitted to, and approved in writing by the local planning authority. The development shall be carried out in accordance with the details so agreed prior to the occupation of these plots and shall be retained as such thereafter.</p> <p>REASON: To improve highway safety for pedestrian and to provide adequate service access for all vehicle types.</p>
11	<p>The development hereby approved in relation to criterion a) and b) below concerning each building, plot or phase (whichever is relevant) 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 Environment Statements; 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 in relation to each building, plot or phase (whichever is relevant) shall not progress above damp proof course level until details to show that appropriate noise mitigation measures in line with the strategy set out in the submitted Environment Statements have been incorporated within the design of each building (including appropriate glazing and Mechanical Ventilation and Heat Recovery System) has been submitted to, and agreed in writing by, the local planning authority. The details shall include independent acoustic testing where applicable. 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 a high standard of amenity for future occupiers of the site and provides adequate noise mitigation.</p>

13	<p>The development hereby approved in relation to each building, plot or phase (whichever is relevant) 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>
14	<p>The development hereby approved in relation to each building, plot or phase (whichever is relevant) shall not progress beyond damp proof course level until a Fire Statement produced by a third party suitably qualified assessor 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 unless otherwise agreed by the local planning authority or Fire Authority.</p> <p>REASON: To ensure that the development proposals achieve the highest standard of fire safety.</p>
15	<p>The development hereby approved in relation to each building, plot or phase (whichever is relevant) shall not be occupied 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/garden) within the site has been submitted to, and agreed in writing by, the local planning authority. Details shall also include a revised lighting strategy for the Residential Street to incorporate lighting columns. 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>
16	<p>The development hereby approved in relation to each building, plot or phase (whichever is relevant) shall not be occupied 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 relevant building 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</p>

	future occupiers the buildings.
17	<p>The development hereby approved in relation to each plot or phase (whichever is relevant) as noted below shall not be occupied until the following details have been submitted to, and agreed in writing by, the local planning authority:</p> <p>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. Hard standing details shall also;</p> <p>b) Details of all furniture, boundary treatment, 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 and raised beds;</p> <p>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;</p> <p>d) Full elevations and cross-sections (at a scale of not less than 1:100) for the podium levels, including the proposed details for the external walls (including planted walls) for the podium deck and should include tree planting/ fixing details for the podium levels.</p> <p>e) Hard and soft landscape details and planting plans for the green 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;</p> <p>f) 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;</p>

	<p>g) In relation to Plots D4 and D6 only, details of the hard standing areas required for the storage of refuse bins on the day of collection for Building D4.5 and the ground floor units located on the Residential Street situated between the courtyards blocks in Plot D6; and</p> <p>h) In relation to Plot D1 full details, including cross sections and elevations for the proposed boundary wall between this Plot and the Waverley Industrial Estate.</p> <p>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.</p>
18	<p>The development hereby approved in relation to each plot or phase (whichever is relevant) shall not be first occupied until a verification report demonstrating completion of the works set out in the approved remediation strategy 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. A verification report is only required to be submitted and approved once per phase. REASON: To protect groundwater and future end users of the site</p>
19	<p>The development hereby approved in relation to each plot or phase (whichever is relevant) 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> <p>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;</p> <p>b) identify the electric vehicle charging point spaces that are to be</p>

	<p>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;</p> <p>c) details of the relevant disabled person's parking spaces within the development (for residents);</p> <p>d) details of the provision of cycle parking for residents and visitors to the development, which shall include the type of cycle stands proposed (including specification);</p> <p>e) details and location of the spaces for parking motorbikes/scooters; and</p> <p>f) details of a servicing and delivery management plan.</p> <p>The development shall be carried out in accordance with the plan so agreed prior to the occupation of the relevant plot or phase, and shall be retained as such thereafter. REASON: To ensure that the development provides sufficient disabled parking, cycle, motorcycle and electric vehicle charging points.</p>
20	<p>The development hereby approved in relation to each plot or phase (whichever is relevant) 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>
21	<p>Prior to the first occupation of each building, plot or phase (whichever is relevant), 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</p>

	<p>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>
22	<p>The relevant building, plot or phase (whichever is relevant) 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>
23	<p>The proposed Extra Care building (located in Plot D2) shall not be first occupied until the following details have been submitted to, and approved in writing by the local planning authority:</p> <ul style="list-style-type: none"> a) Details to show that the communal mobility scooter store can, if required, make provision for secure cycle parking for residents; and b) Details demonstrating the provision of some form of low wall (or other form of enclosure) to the private amenity areas adjoining the communal walkway. <p>The development shall be carried out in accordance with the details so agreed and shall be put in place prior to the first occupation of this building.</p> <p>REASON: To ensure that the proposal provides opportunity for cycling and provides adequate privacy amenity for the future residents of this building.</p>
24	<p>Within 3 months (or other such period agreed in writing by the local planning authority) of the final completion of the relevant building(s) 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>
25	<p>The mail boxes as shown on the approved plans shall be installed to ensure that they secure and meet all safety standards and shall be made available prior to the first occupation of each relevant building.</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>

26	<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>
27	<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>
28	<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>
29	<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>
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>

31	<p>Unless otherwise agreed in writing by the local planning authority, the non-residential flexible active premises hereby approved on development 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>
32	<p>The D1 use forming one of the flexible active uses, shall only be used for the purposes set out as below and for no other purpose, including any other purpose 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>Permitted uses: clinics, health centres, creches, day nurseries, day centres, art galleries (other than for sales or hire), museums, libraries, law court and non-residential education and training centres.</p> <p>REASON: To safeguard the amenity of neighbouring residents and the character of the locality and in the interests of highway safety.</p>
33	<p>In relation to the non-residential flexible active uses hereby permitted no music or any other amplified sound caused as a result of this permission shall be audible at the boundary of any residential premises either attached to, or in the vicinity of, the premises to which this permission refers.</p> <p>REASON: To ensure that the proposed development does not give rise to noise nuisance to neighbouring residents.</p>
34	<p>Unless otherwise agreed in writing by the local planning authority, access to all podium gardens shall be unrestricted during the day and shall only be secured from public access (other than from residents of the relevant building) during the night time only.</p> <p>REASON: To ensure that adequate safety and privacy is maintained for residents of the relevant plots and to encourage social cohesion for future residents of this development.</p>
35	<p>The refuse bins shall be stored at all times, other than on collection days, in the designated refuse storage areas, as shown on the approved drawing plans.</p> <p>REASON: To safeguard the appearance and character of the surrounding area and to ensure a high standard of residential quality in accordance.</p>

Informatives

1	<p>INFORMATIVE: The following policies are relevant to this decision:</p> <p>National Planning Policy Framework (2019)</p> <p>The London Plan (2016) Policies: 2.13, 3.3, 3.4, 3.5, 3.6, 3.7, 3.8, 3.11, 3.12, 4.7, 5.1, 5.2, 5.3, 5.4, 5.7, 5.10, 5.11, 5.12, 5.13, 5.15, 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, 7.19</p> <p>Intention to Publish London Plan (2019) Policies: SD7, GG2, D1, D2, D3, D4, D5, D6, D7, D8, D11, D13, H1, H4, H5, H6, H7, H10, H15, G5, G6, G7, SI 2, SI 1, SI 3, SI 4, S1 5, S1 7, SI12, SI13, T2, T4, T6, T6.1, T6.3, T6.5</p> <p>The Harrow Core Strategy (2012) Core Policies CS1</p> <p>Harrow and Wealdstone Area Action Plan (2013) Policies: AAP1, AAP3, AAP4, AAP5, AAP6, AAP8, AAP9, AAP10, AAP11, AAP12, AAP13, AAP17, AAP19, AAP20</p> <p>Development Management Policies Local Plan (2013) Policies DM1, DM2, DM3, DM7, DM9, DM10, DM12, DM13, DM14, DM15, DM20, DM21, DM22, DM23, DM24, DM27, DM28, DM35, DM42, DM45, DM49</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 (2016). Mayors Housing Supplementary Planning Guidance (2016) Mayors Accessibility Supplementary Planning Guidance (2014) Mayors Affordable Housing and Viability Supplementary Planning Guidance (2017)</p>
2	<p>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>The Party Wall etc. Act 1996 requires a building owner to notify and obtain formal agreement from adjoining owner(s) where the building owner intends to carry out building work which involves: 1. work on an existing wall shared with another property;</p>

	<p>2. building on the boundary with a neighbouring property; 3. excavating near a neighbouring building, and that work falls within the scope of the Act. Procedures under this Act are quite separate from the need for planning permission or building regulations approval. "The Party Wall etc. Act 1996: explanatory booklet" is available free of charge from: Communities and Local Government Publications, PO Box 236, Wetherby, LS23 7NB Please quote Product code: 02 BR 00862 when ordering. Also available for download from the Portal website: https://www.gov.uk/party-wall-etc-act-1996-guidance</p>
4	<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>Please be advised that approval of this application (either by Harrow Council, or subsequently by the Planning Inspectorate if allowed on appeal following a refusal by Harrow Council) will attract a Community Infrastructure Levy (CIL) liability, which is payable upon the commencement of development. This charge is levied under s.206 of the Planning Act 2008 Harrow Council, as CIL collecting authority, has responsibility for the collection of the Mayoral CIL The Provisional Mayoral CIL liability for the application, based on the Mayoral CIL levy rate for Harrow of £60/sqm is £6,659,820. The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).</p> <p>You are advised to visit the planningportal website where you can download the appropriate document templates. Please complete and return the Assumption of Liability Form 1 and CIL Additional Information Form 0 . https://ecab.planningportal.co.uk/uploads/1app/forms/form_1_assumption_of_liability.pdf https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf If you have a Commencement Date please also complete CIL Form 6:</p>

	<p>https://ecab.planningportal.co.uk/uploads/1app/forms/form_6_commencement_notice.pdf</p> <p>The above forms should be emailed to HarrowCIL@Harrow.gov.uk</p> <p>Please note that the above forms must be completed and provided to the Council prior to the commencement of the development; failure to do this may result in surcharges and penalties</p>
6	<p>Harrow has a Community Infrastructure Levy which applies Borough wide for certain developments of over 100sqm gross internal floor space. Harrow's Charges are:</p> <p>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.</p> <p>The Provisional Harrow CIL liability for the application, based on the Harrow CIL levy rate for Harrow of £110/sqm is £12,198,770 This amount includes indexation which is 323/224. The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).</p> <p>The CIL Liability is payable upon the commencement of development. You are advised to visit the planningportal website where you can download the relevant CIL Forms. Please complete and return the Assumption of Liability Form 1 and CIL Additional Information Form 0 . https://ecab.planningportal.co.uk/uploads/1app/forms/form_1_assumption_of_liability.pdf https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf If you have a Commencement Date please also complete CIL Form 6: https://ecab.planningportal.co.uk/uploads/1app/forms/form_6_commencement_notice.pdf</p> <p>The above forms should be emailed to HarrowCIL@Harrow.gov.uk</p> <p>Please note that the above forms must be completed and provided to the Council prior to the commencement of the development; failure to do this may result in surcharges.</p>
7	<p>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 Secured by Design condition.</p>
8	<p>The applicant is advised Thames Water do not have capacity for these plots or the wider Kodak Site development. Modelling is being undertaken by Thames Water and the phasing of the Kodak Site shows there will be no occupation until September 2022. Thames Waters current program indicates that they will have completed reinforcement works for the whole of the Kodak Development site by the end of</p>

	<p>December 2021. As a result of this, Thames Water does not raise any concerns. However, if the phasing plan we have been provided was to be incorrect or to change then Thames Water would need to be contacted and concerns would be raised as our program of works has been planned out and we only have capacity once the works are completed.</p>
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Checked

<u>Interim Chief Planning Officer</u>	
<u>Corporate Director</u>	

APPENDIX 2: SITE PLAN



Proposed site plan in context of the wider masterplan site

APPENDIX 3: PLANS AND ELEVATIONS



Plot D1 - Proposed ground floor plan



Plot D1 – Proposed elevation fronting Avenue South



Plot D1 – Proposed elevation fronting Avenue North



Plot D2 – Buildings D2.1 and D2.2 elevations fronting the park (top) and Residential Street to the North-west

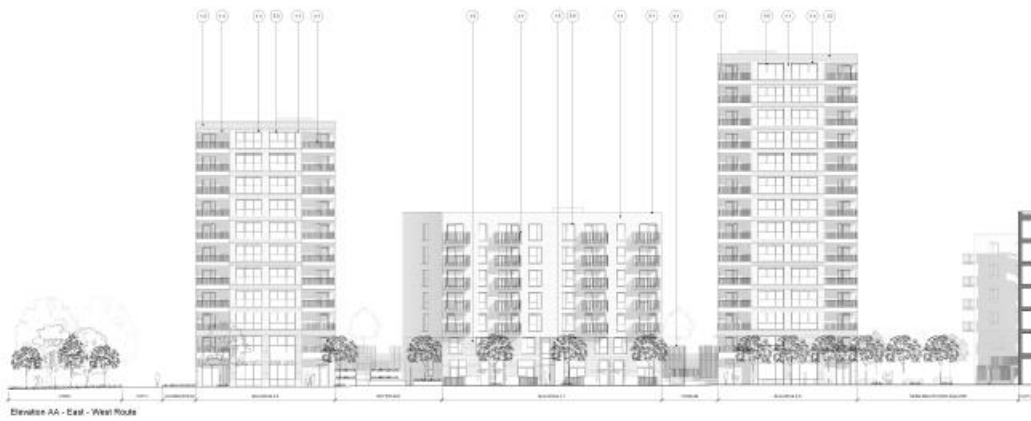




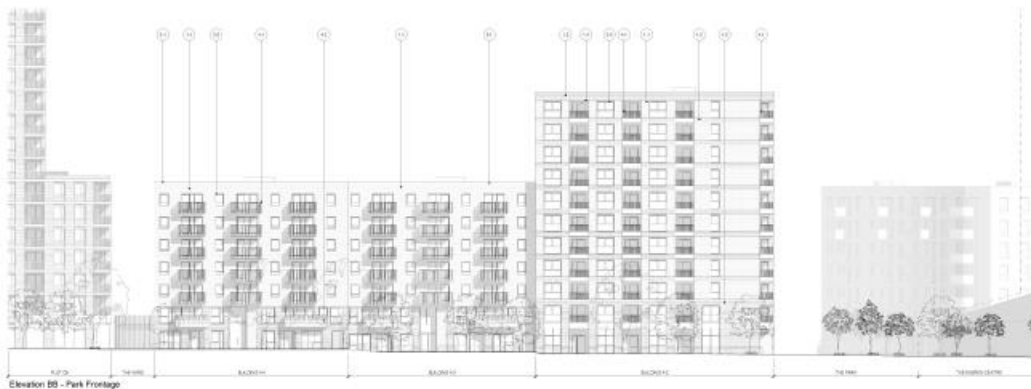
Plot D2 – Extra Care building – elevation facing Avenue South (top) and southwest elevation facing Plot A5



Plot D4 – Ground floor layout

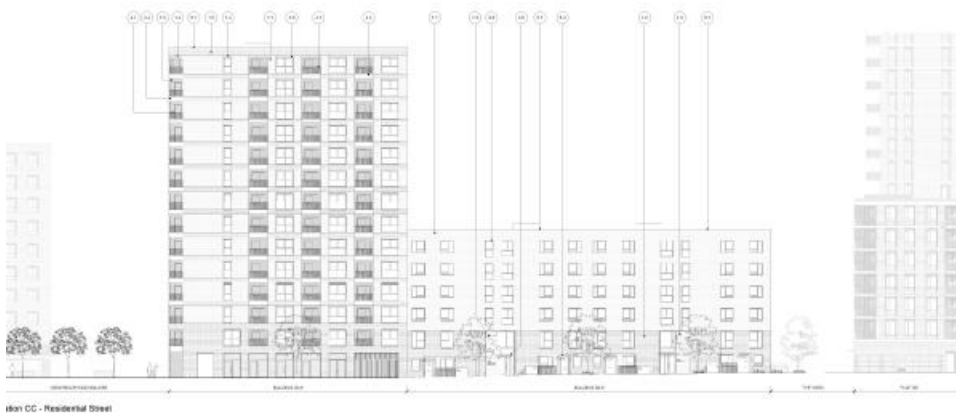


Elevation AA - East - West Route



Elevation BB - Park Frontage

Plot D4 – elevation fronting Plot D2 (top) and elevation facing the park

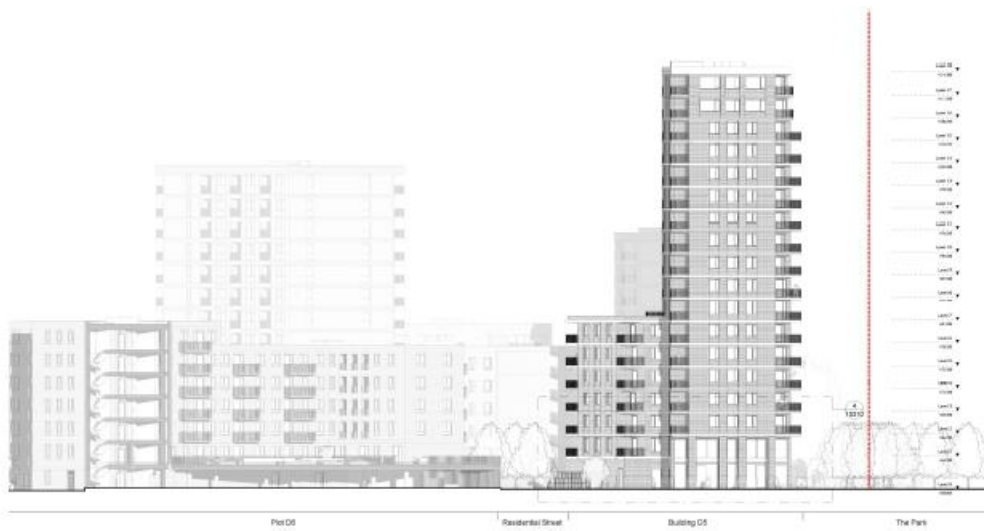


Plot CC - Residential Street

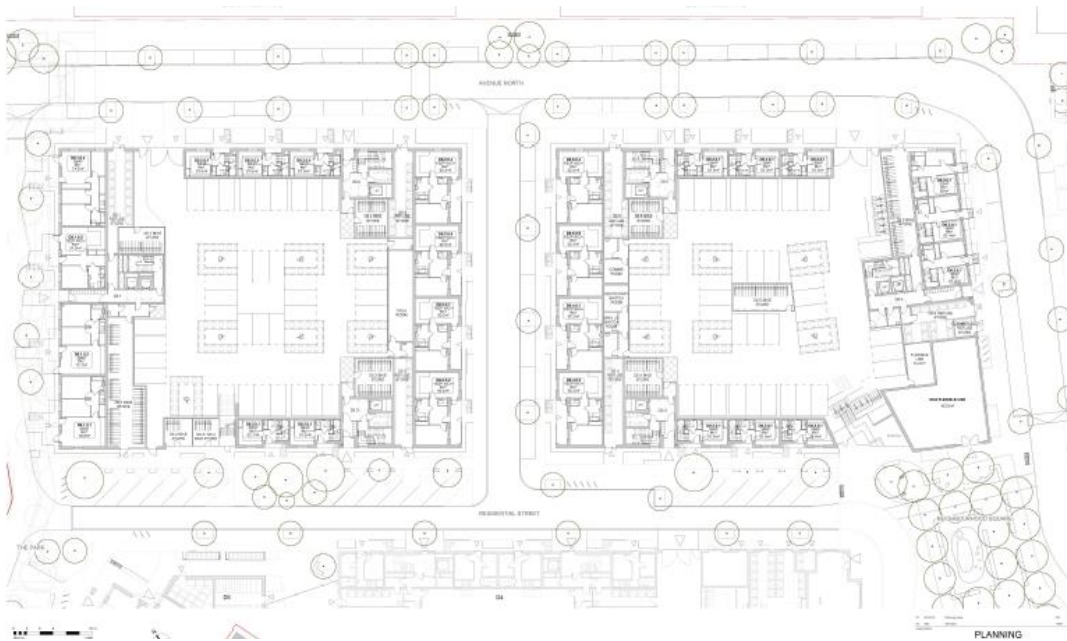


Plot DD - The Yard

Plot D4 – elevation facing Residential Street (top) and elevation facing Plot D5



Plot D5 – elevation fronting the north-east section of the Green Link



Plot D6 – ground floor layout



Plot D6 – elevations fronting Avenue North (top) and elevation fronting the Residential Street

APPENDIX 4: STAGE 1 GLA RESPONSE

GREATER LONDON AUTHORITY

Sushila Bhandari
London Borough of Harrow
Development Management
PO Box 37, Civic Centre, Station Road
Harrow HA1 2UY

Our ref: GLA/4995/01
Your ref: P/3944/19
Date: 11 November 2019

Dear Ms Bhandari

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

Plots D1, D2, D4, D5 and D6 (Development Zone D), Harrow View East, Local planning authority reference: P/3944/19

I refer to the copy of the above planning application, which was received from you on 18 September 2019. On 11 November 2019, the Mayor considered a report on this proposal, reference GLA/4995/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not yet comply with the London Plan and draft London Plan, for the reasons set out in paragraph 78 of the above report; but that possible remedies set out in that paragraph could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Melvyn Dresner, e-mail Melvyn.Dresner@tfl.gov.uk.

Yours sincerely,



Alison Flight
Deputy Head of Development Management

City Hall, London, SE1 2AA • london.gov.uk • 020 7983 4000

cc Navin Shah, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL
Alister Henderson, Carter Jonas

Harrow View East, Plots D1, D2, D4, D5 & D6

11 November 2019

in the London Borough of Harrow

planning application ref: P/3944/19

<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>The development of Plots D1, D2, D4, D5 and D6 at Harrow View East (former Kodak Factory) for 1,238 residential dwellings (including a 60 unit Extra Care Facility), 362 sq.m. of café/restaurant space, 728 sq.m. of flexible commercial/community uses in buildings ranging in height from two to eighteen storeys; together with new roads and other means of access and circulation, associated car and cycle parking, open space, landscaping and ancillary development including all necessary infrastructure works.</p>
<p>The applicant</p> <p>The applicant is Harrow View LLP. The architects are Makower Architects (Plot D1 and two buildings in Plot D2); Piercy and Company (one building in Plot D2 and one building in Plot D5), East (Extra Care building in Plot D2); and Pollard Thomas Edwards (Plot D4 and Plot D6).</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 Area Action Plan (paragraphs 20 to 24).</p> <p>Affordable housing: The provision of 40% affordable housing (with grant, by habitable room) is strongly supported. An early stage viability review must be secured as part of the Section 106 agreement in accordance with Policy H6 of the draft London Plan and the Affordable Housing and Viability SPG, and affordability of the various housing products must be confirmed and secured (paragraphs 26 to 36).</p> <p>Design: The broad layout and massing provides positive enhancements to the permeability of the site. The new public square and a series of well-defined street and building typologies add to the rich character of the development. No strategic design concerns are raised (paragraphs 51 to 56).</p> <p>Transport: The transport assessment should clarify the secured mitigation measures and measures required to mitigate impacts of the proposal. The impact of additional trips on station capacity and train line loadings should be assessed. Further detail is required to confirm cycle parking standards are achieved. Improvements to the routes to the nearby stations should be secured (paragraphs 68 to 74).</p> <p>Outstanding issues relating to Agent of Change, playspace, energy, water, urban greening and transport need to be addressed.</p>
<p>Recommendation</p> <p>That Harrow Council be advised that the application does not yet comply with the London Plan and draft London Plan, for the reasons set out in paragraph 78 of this report; but that possible remedies set out in that paragraph could address these deficiencies.</p>

Context

1 On 18 September 2019, 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 must provide the Council with a statement setting out whether he considers that the application complies with the London Plan and draft 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 Categories of the Schedule to the Order 2008:

- *1A(1) - Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.*
- *1B(1c) - Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres.*
- *1C(1c) - Development which comprises the erection of a building that is 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 Plots D1, D2, D4, D5 & D6 of the wider Kodak factory outline masterplan (planning ref: P/3405/11), also referred to as Harrow View East.



Figure 1: Proposed Site plan in context of emerging masterplan

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 The application site lies approximately one kilometre from Harrow and Wealdstone Station and about 900 metres from Headstone Lane station, which are served by national rail, London Overground services and London Underground Bakerloo Line services. Harrow on the Hill Station is approximately two kilometres from site, which is served by London Underground Metropolitan Line and national rail services. Three bus routes run adjacent to the site. The nearest part of the Strategic Route Network lies approximately 800 metres to the east and west (High Street and Pinner Way, respectively). The public transport access level (PTAL) of the site ranges from 0 to 3, on a scale of 0 to 6b, where 0 is the least accessible and 6b the most accessible most of the site is either 3 or 2 with a small area of 0 to the north-west.

Details of the proposal

9 The proposal is for the development of Plots D1, D2, D4, D5 and D6 at Harrow View East (former Kodak Factory) for 1,238 residential dwellings (use class C3 - including a 60 unit Extra Care Facility), 362 sqm (GIA) of café/restaurant space (Use Class A3), 728 sqm (GIA) of flexible active uses (Uses Classes, A1, A2, B1(a) and D1) in buildings ranging in height from two storeys to eighteen storeys; together with new roads and other means of access and circulation, associated car and cycle parking, open space, landscaping and ancillary development including all necessary infrastructure works.

10 Table 1 shows the proposed mix across the site.

	Plot D1	Plot 2	Plot 2 Extra Care	Plot D4	Plot D5	Plot D6	Total	%
1b/1p	0	86	0	2	3	0	91	7.4%
1b/2p	185	61	58	134	58	61	557	45.0%
2b/3p	95	61	2	112	34	108	413	33.4%
2b/4p	0	0	0	0	0	38	38	3.1%
3b/4p	27	9	0	25	0	57	118	9.5%
3b/5p	2	5	0	6	8	0	21	1.7%
Total	310	222	60	279	103	264	1238	100%

Table 1: Proposed housing mix, by unit, across Plots D1, D2, D4, D5 and D6.

Case history

11 Following consultation with the Mayor (GLA reference: 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. This permission approved up to 35,975 sq.m. business and employment space, 985 residential dwellings, up to 220 units of student accommodation, up to 9,300 sq.m. senior living accommodation and assisted living accommodation, up to 5,000 sq.m. retail and restaurant uses, up to 8,830 sq.m. of community facilities including primary school, health centre and community and leisure uses, energy centre and associated access, parking, landscaping and provision of utilities.

12 A revised outline planning permission (LPA reference: P/2165/15, GLA reference: D&P/2830b/01) for the Kodak Factory site was approved in September 2015. The revised scheme provides for up to 1,800 dwellings, up to 32,360 sqm of B1, B2 and B8 uses, up to 10,230 sqm of senior living accommodation and assisted care living, up to 2,000 sqm for a foodstore, up to 2000 sqm for A1-A5, B1a and D1 uses a total of 9,730 sqm of commercial leisure, community, health and a primary school, an energy centre and multi-storey car park.

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 An application has been submitted for detailed permission on Plot A3 (within zone A) which removes the 30 residential units and extra care facility (5,054 sq.m.) approved under the reserved matters for this plot and replaces it with 127 residential units. This application is currently under consideration (GLA ref: 2830c).

16 On 14 January 2019 GLA Officers held a pre-planning application meeting at City Hall to discuss the proposed scheme. Following this meeting, a letter dated 21 February 2019 was issued providing written advice in regard to land use, affordable housing, children’s playspace, urban design, inclusive access, air quality, climate change, sustainability and transport. The advice concluded the principle of the proposed development is supported given its optimisation of land and contribution towards housing delivery, that the broad design principles are welcomed, and that further discussions are required to determine the use class of the proposed care home and to ensure that the scheme delivers the maximum amount of affordable housing, at genuinely affordable levels. A follow-up pre-application meeting was held on 22 May 2019 with additional advice provided on the 5 June 2019 in respect of discount market sale affordable housing products.

Strategic planning issues and relevant policies and guidance

17 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the 2012 Harrow Core Strategy, the 2013 Development Management Policies, the 2013 Site Allocations, the 2013 Harrow and Wealdstone Area Action Plan, the Joint West London Waste Plan and the 2016 London Plan (Consolidated with Alterations since 2011).

18 The following are relevant material considerations:

- The National Planning Policy Framework (February 2019) and National Planning Practice Guidance.
- The Draft London Plan – Consolidated Changes Version July 2019 which should be taken into account on the basis explained in the NPPF.
- In August 2017, the Mayor published his Affordable Housing and Viability Supplementary Planning Guidance. This must now be read subject to the decision in R(McCarthy & Stone) v. Mayor of London.

19 The relevant issues and corresponding policies are as follows:

- | | |
|---------------------------|--|
| • Opportunity Area | <i>London Plan; draft London Plan;</i> |
| • Land use | <i>London Plan; draft London Plan;</i> |
| • Housing | <i>London Plan; draft London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;</i> |
| • Affordable housing | <i>London Plan; draft London Plan; Housing SPG; Affordable Housing and Viability SPG; Housing Strategy;</i> |
| • Density | <i>London Plan; draft London Plan; Housing SPG;</i> |
| • Urban design | <i>London Plan; draft London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;</i> |
| • Inclusive access | <i>London Plan; draft London Plan; Accessible London: Achieving an Inclusive Environment SPG;</i> |
| • Sustainable development | <i>London Plan; draft London Plan; Sustainable Design and Construction SPG; Mayor’s Environment Strategy;</i> |
| • Transport and parking | <i>London Plan; draft London Plan; the Mayor’s Transport Strategy;</i> |

Principle of development and land use principles

20 The site is located within the Harrow and 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 and Wealdstone Opportunity Area is identified in the London Plan as having an indicative capacity for a minimum of 3,000 new jobs and 2,800 new homes and is identified in the draft London Plan as having an indicative capacity for a minimum of 1,000 new jobs and 5,000 new homes. Locally, the Harrow and 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 Heart of Harrow Housing Zone.

Housing

21 London Plan Policy 3.3 and draft London Plan Policy H1 seeks to increase the supply of housing in the capital, setting Harrow a ten-year housing target in the London Plan of 5,927 homes, and in the draft London Plan, 13,920 homes. The proposed development would deliver 1,238 new homes, significantly contributing to these housing targets. The proposal involves the optimisation of land and contribution towards housing delivery within this Opportunity Area and housing zone location is supported in accordance with London Plan Policy 3.3 and 2.13 and draft London Plan Policies GG2 and H1.

Extra care facility

22 Draft London Plan Policy H15, relating to specialist older persons housing, states that specialist older persons housing provision should deliver affordable housing, accessible housing, the highest standards of accessible and inclusive design, suitable levels of safe storage and charging facilities for resident's mobility scooters as well as pick up and drop off facilities close to the principal entrance suitable for taxis, minibuses and ambulances. The applicant has proposed a 60-unit extra care facility (within C3 land use) which is located within Plot D2. The affordable housing for the extra care facility is outlined in detail in the affordable housing section of this report (100% of the extra care units are proposed as affordable units) and accessibility is discussed in the inclusive design section of the report.

23 The provision of the extra care facility and the proposed co-location with housing is supported in line with London Plan and draft London Plan policies. A range of communal facilities are proposed at ground level of the extra-care facility including a kitchen, servery and communal dining area, a communal living room with tea making facilities, a scooter store providing parking for 15 scooters, reception and lobby area, a shared laundry, a hobby room, a hairdresser / wellness room, as well as a staff area with staff overnight facilities and a guest overnight room. It is considered the proposed development falls within the operations of C3 use class because while there are communal facilities, the units are self-contained (unlike a hospice, nursing care units or dementia care homes - which are examples of C2 units). The units would exceed technical space standards, and comprise a kitchen, bedroom, living room, shower room and private residential amenity; enabling residents to choose independent living. The application documents set out that it is assumed that over 50% of the extra care units will have medium or high care needs (for example, may be too frail to utilise scooters). It is understood that the applicant is engaging with registered providers in respect of the operation and management of the extra care units. Further information should nevertheless be provided regarding the proposed level of care and staffing of the proposed accommodation, in addition to evidence for the local demand for this type of accommodation and detail how/if the proposal meets local requirements of the Borough.

Employment / retail use

24 The proposal would introduce approximately 362 sq.m. of café / restaurant (Use Class A3) floorspace. 728 sq.m. of flexible commercial / community uses (Use classes A1, A2, D1, B1(c) are also proposed. The flexible commercial units are proposed in Plot D1, Plot D2, Plot D5 and D6, with the café (A3) unit proposed in Plot D4. The cafe unit is expected to generate between 15 and 20 full-time employment jobs and the flexible commercial floorspace is expected to generate between 15 and 60 jobs. While located outside a town centre, the proposed commercial units are relatively small scale in the context of the wider development and would serve the future residential community through the provision of services, facilities and jobs, in addition to assist in animating the public square and providing activation to key routes, and as such, is supported in principle. Suitable conditions should be imposed to ensure that the commercial floorspaces are not delivered entirely as retail spaces. Due to the scale of residential development proposed, the applicant should work with Harrow Council to secure a portion of the commercial floorspace as a genuine community (D1) land use, in line with London Plan Policy 3.16 and draft London Plan Policy D1A and S1.

Principle of development conclusion

25 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 Area Action Plan.

Housing

26 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 ten-year housing target of 13,920 for the period 2019/20 to 2028/29. The scheme would deliver 1,238 new homes, which would significantly contribute towards this target and is strongly supported.

Affordable Housing

27 London Plan Policies 3.11 and 3.12, draft London Plan Policies H5 and H6, and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing.

28 The Mayor's Affordable Housing and Viability SPG and Policy H6 of the draft London Plan set out the 'threshold approach' to planning applications whereby schemes that meet or exceed the relevant threshold of affordable housing by habitable room without public subsidy, and meet the Mayor's preferred tenure mix, are eligible to follow the "Fast-Track Route" set out in the SPG; this means that viability information is not required for assessment and a late stage viability review would not be sought. In this case, the Fast Track Route threshold would be 35% affordable housing by habitable room, without grant.

29 The preferred tenure mix is outlined in Mayor's Affordable Housing and Viability SPG and Policy H7 of the draft London Plan as at least 30% low cost rent (social rent or affordable rent), at least 30% intermediate (with London Living Rent and shared ownership being the default tenures) and the remaining 40% as determined in partnership with the local planning authority and the GLA to achieve mixed and balanced communities. For any affordable housing provided beyond 35%, tenure is flexible provided that they are genuinely affordable and take account of local housing need in accordance with draft London Plan Policy H7.

30 The application proposes 1,238 homes, of which, 35% (by habitable room) are proposed as affordable housing without grant, and 40% (by habitable room, or 39.3% by unit) is proposed

as affordable housing with grant. The provision of 35% affordable housing by habitable room without grant (40% with grant) is strongly supported in accordance with the strategic target set by Policies 3.11, 3.12 of the London Plan and Policies H5 and H6 of the draft London Plan.

31 The proposed residential schedule by tenure for the application is set out in Table 2, as calculated by unit.

	Studio	1-Bed	2-Bed	3-Bed	Total
Private Sale (market)	5	416	248	82	751
	0.7%	55.4%	33.0%	10.9%	100%
Discount Market Sale	86	6	31	0	123
	69.9%	4.9%	25.2%	0.0%	100%
Shared Ownership	0	24	66	0	90
	0.0%	26.7%	73.3%	0.0%	100%
Affordable Rent	0	53	104	57	214
	0.0%	24.8%	48.6%	26.6%	100%
Social Rent	0	58	2	0	60
	0.0%	96.7	3.3%	0.0%	100%
Total	91	557	451	139	1,238
	7.4	45.0	36.4	11.2	100.0

Table 2: Proposed residential schedule by tenure and by unit.

32 It is understood that the Hyde Group, who form part of the joint venture that form Harrow View LLP and are a strategic partner of the GLA, has successfully sought grant funding to increase the level of affordable housing on this which equates to an additional 5% affordable housing, bring the total provision up from 35%. This is supported.

33 In terms of tenure split, 40.5% of the affordable housing (equating to 523 habitable rooms) is proposed as Intermediate housing comprising shared ownership and discount market sale tenures, and 59.5% of the affordable housing (equating to 786 habitable rooms) is proposed as low-cost rent (Affordable Rent and social rent). At the local level, the Harrow Local Plan sets an affordable housing tenure balance of 60% social / affordable rent and 40% intermediate. As such, the proposed tenure split is considered to align with the Mayor's preferred tenure mix and may qualify for fast-track route and would not be subject to a late stage viability review, subject to securing the affordability of the affordable housing products.

34 The extra care units within the scheme (60 units) are all proposed at affordable rent and all occupiers will have a full assured tenancy agreement. The propose rents for the extra care accommodation (not including service charge) are £155.30 per week for a 1-Bed unit, and £164.24 per week for a 2-Bed unit. The extra care provision is proposed to be supported by GLA grant on the basis that rents are charged at London Affordable Rent Levels. This should be secured within a Section 106 Legal Agreement.

35 The discount market sale affordable housing units propose a 20% discount to outright market sales and will be offered to buyers working and living in Harrow. The discount market sale units will be tenure blind and "pepper potted" amongst the market accommodation located in Plot D2. These discount market sale units must remain affordable in perpetuity; this should be secured within a Section 106 Legal Agreement.

36 The affordability of the intermediate units should be informed by the Mayor's qualifying income levels, as set out in the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report. Income thresholds must be secured accordingly by the Council

in the S106 agreement. The S106 agreement should secure other requirements as set out in the Mayor's Affordable Housing and Viability SPG.

37 To encourage timely delivery of housing, an Early Stage viability review will be secured via the Section 106 agreement in line with draft London Plan Policy H6 and the Mayor's Affordable Housing and Viability SPG.

Residential Mix

38 London Plan Policies 3.8 and 3.11, as well as draft London Plan Policy H12, encourage a choice of housing based on local needs with affordable family housing identified as a strategic priority. This is supported by the London Plan Housing SPG, which seeks to secure family accommodation within residential schemes and sets strategic guidance for councils in assessing their local needs. Policy 3.11 of the London Plan states that within affordable housing provision, priority should be accorded to family housing.

39 Whilst the applicant should seek to maximise the provision of family-sized units, it is acknowledged that the unit mix will be informed by local demand and 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.

40 While a varied mix is provided for affordable rent and private tenure with a range of 1-bed, 2-bed and 3-bed units proposed, some tenures are focused on a single housing typology with the housing mix for social rented tenure comprising 97% one-bed units, and the mix provided for discount market sale tenure comprising 70% studio units. The Council should confirm that the proposed unit mix, including the unit mix for social rented homes, responds to local need, and the mix should be secured within the grant of permission.

Residential Quality

41 London Plan Policy 3.5, Policy D4 of the draft London Plan and the Mayor's the Housing SPG all require housing developments to be of the highest quality internally and externally, and to have adequately-sized rooms with convenient and efficient layouts that are functional, fit for purpose and meet the changing needs of Londoners over their lifetimes.

42 Buildings have been oriented and designed to maximise dual aspect units and all homes include a private outdoor amenity space. Residential corridors have been designed to be naturally lit and ventilated which is in accordance with the Mayor's Housing SPG and this is supported.

43 Plot D1 consists of three tall and two shorter elements on a two-storey podium with family duplexes at street level. Edges along the podium provide a good level of passive surveillance and the layout at general ground level is well-considered.

44 Plot D2 is a courtyard block arranged around a communal podium garden. Building D2.1 contains 12 units per core and the applicant has provided satisfactory justifications that ensure overall residential quality is of a high standard.

45 The Extra Care building (within Plot D2) is arranged as a seven-storey L-shaped building. Whilst the proposed development includes 10 units per floor, this is considered acceptable as it allows the building to be lower and promotes sociability in the building, which was a requirement in the design brief of the Extra Care building. It has been demonstrated how the provision of a generous walkway access and communal spaces at ground floor will achieve good residential standards.

46 Plot D6 consists two 6-8 storey courtyard blocks and all homes proposed within the block will be affordable. Nine units per core is proposed on the first floor of Building D6.6. Duplex units have been provided at street level and gallery access has been introduced to enable dual aspect apartments.

Agent of Change

47 Draft London Plan Policy D12 'Agent of change' states that new noise and other nuisance-generating development proposed close to residential and other sensitive uses should put in place measures to mitigate and manage any impacts. Furthermore, it states that development proposals should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances; exploring mitigation measures early in the design stage, with necessary and appropriate provisions, including ongoing and future management of mitigation measures secured through planning obligations; and separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, and insulation and other acoustic design measures. The applicant should demonstrate that consideration has been had to these "Agent of Change" principles in respect of noise-generating uses and industrial vehicle movements in addition to pedestrian safety, dust, odour, light and vibration nuisances etc., due to the proximity of the blocks with Plots D6 to strategic industrial land located to the north-east of the site within Plot D3 of the masterplan, and the proximity of Plot D1 to the Waverly Industrial Estate.

Playspace

48 London Plan Policy 3.6 and draft London Plan Policy S4 set out the expectation that housing proposals should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. The policy sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5-year olds playspace provided on-site as a minimum.

49 Using the methodology within the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG and the GLA's Playspace Calculator, it is anticipated that there will be approximately between 450.4 and 546.9 children within the development based on the current housing and tenure mix. As such the development should make provision for between 4504.1 and 5468.9 sq.m. of playspace within the application site boundaries.

50 The Design and Access statement sets out that the scheme is proposing 2335 sq.m. of playspace within the development. Some playspace for 0-5 years and 12+ is proposed on the Green link Park, outside the red line area, and additional 0-5 play spaces are proposed as doorstep play in communal gardens and the public realm. The playspace provision should be increased in order to comply with the London Plan and draft London Plan; noting that the provision for under 5's provision must be prioritised on-site. Robust justification must be provided to address any shortfall, noting the uplift of approximately 900 residential units this application proposes within the context to the wider outline scheme, and a financial contribution should be secured by the Council toward the offsite delivery. Conditions should be imposed to ensure that the playspace delivered includes high-quality playable features. To ensure compliance with draft London Plan S4, it should be demonstrated that no playspace is segregated by tenure, and this should be secured within any permission.

Urban Design

51 The design principles in Chapter 7 of the London Plan and Chapter 3 of the draft London Plan requires all developments to achieve a high standard of design which responds to local

character, enhances the public realm and includes architecture of the highest quality that defines the area and makes a positive contribution to the streetscape and cityscape.

52 Policy 7.1 of the London Plan sets out that the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood. Policy D1 of the draft London Plan seeks to ensure that development responds to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality. The broad layout and massing of the scheme improves on previous reiterations of the scheme and provides positive enhancements to the public realm and permeability of the site. The proposal comprises of a new public square at the centre of the scheme and a series of well-defined street and building typologies that add to the richness and character of the development.

53 Satisfactory evidence of a design-led approach has been provided which demonstrates the uplift of density on-site and optimisation of site capacity that is in keeping with the surrounding context. This approach is strongly supported.

54 The proposed development does not affect strategic designated views or protected vista extensions. There are no conservation areas or listed buildings within the context of the site that would directly affect the proposed development.

55 The choice of material and quality of design should be consistent with the surrounding buildings, and this should be secured by the Council.

56 The Design and Access statement details the fire strategy for the various plots, demonstrating that fire safety has been considered during design development. A Fire Statement produced by a third party suitably qualified assessor should be secured in accordance with draft London Plan Policy D3 and D11 to ensure the development proposals achieve the highest standards of fire safety.

Heritage

57 London Plan Policy 7.8. and Policy HC1 of the draft London Plan states that development should conserve heritage assets and avoid harm. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. Any harm identified should be given considerable weight and importance. In relation to listed buildings, all planning decisions should *"have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"*. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

58 The site does not contain any designated heritage assets nor is the site located within a conservation area. The Headstone Manor (Grade I Listed Building), the earliest surviving timber framed house in Middlesex, and buildings (a Grade II* listed barn, Grade II listed outbuilding and granary) are located approximately 600 metres to the north-west of the application site. The TVIA sets out that the Manor, outbuildings and grounds are experienced as part of a moated site, within the Headstone Manor Recreation Ground.

59 The report details that from the listed buildings' grounds *"the Proposed Development would be predominately obscured by interposing development and mature evergreen and deciduous vegetation in the fore and middle ground of the view. During summer months*

deciduous trees will grow their leaves, and views of the Proposed Development will be further restricted. The report goes on to state "Where visible, the Proposed Development will be glimpsed above the roofline of existing residential development and would be perceived as part of the backdrop of tall and large buildings at Harrow View East. The report however considered that any effect would be minor beneficial noting that "Although views through to the backdrop are highly filtered, visual receptors will get glimpsed views of the architectural quality of the blocks. The use of the red, dark brown and buff bricks will contribute in distinguishing the blocks from one another and will be complementary to the existing built form, while referencing the former Kodak buildings". GLA officers are satisfied the proposal would not cause any harm to the setting of the listed buildings. The proposal therefore accords with Policy 7.8 of the London plan and Policy HCl of the draft London Plan.

Inclusive design

60 London Plan Policy 7.2 and draft London Plan Policy D3 require that all new development achieves the highest standard of accessible and inclusive design and can be used safely, easily and with dignity by all. London Plan Policy 3.8 'Housing Choice' and Policy D5 of the draft London Plan requires that 90% of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and 10% meets Building Regulation requirement M4(3) 'wheelchair user dwellings', that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

61 The Design and Access statement sets out that 90% of new homes have been designed to comply with Building Regulations Approved Document Part M 2015 Category 2 (Accessible and Adaptable Dwellings) and 10% have been designed to comply with Category 3 (Wheelchair User Dwellings). This provision should be secured by the local planning authority. The extra care facility includes lift access to the upper floors and mobility scooter parking providing a high level of inclusive design for these residents; this is supported. The design of the public realm will be fundamental to how inclusive the development will be for many people. Noting a variety of stepped areas for each podium, dropped kerbs and trees pits along the street, and a variety of material types proposed for the paving around the development, the Council should ensure that inclusive accessibility is secured throughout the development by condition.

Environment

Energy

62 The Energy Hierarchy has broadly been followed; however, the applicant is required to review their energy proposals to ensure compliance with the London Plan and draft London Plan policies. Clarification is required in respect of the Be Lean carbon emissions savings and additional information is required in respect of the Be Clean proposals within the site including a commitment that the development is designed to allow future connection to a district heating network, and a low carbon heating method should be investigated. In line with London Plan Policies 5.2 and 5.7 and draft London Plan S12, the on-site savings from renewable energy technologies, regardless of the London Plan targets having been met, are required to be maximised. The technical detailed comments have been sent to the Borough to be addressed in their entirety.

Flood Risk and Sustainable Drainage

63 The site is in Flood Zone 1 and greater than 1 hectare in area. A Flood Risk Assessment has been submitted as required under the NPPF which considers the risk of flooding from a range of sources. When mitigation measures are considered, the residual flood risk to the site is low. The approach to flood risk management for the proposed development complies with London Plan Policy 5.12 and draft London Plan Policy SI.12.

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64 The surface water drainage strategy provides an assessment of greenfield runoff rate and attenuation storage required to restrict the 100 year (plus 40% climate change) post-development discharge rate to greenfield rate. The surface water drainage strategy does not explicitly address the London Plan drainage hierarchy, however proposes a range of SuDS measures including green roofs, raingardens, permeable paving and attenuation in both paving base layers and tanks. This approach generally satisfies the requirements of London Plan Policy 5.13 and draft London Plan SI.13.

65 A London Sustainable Drainage Proforma should be submitted. The proformas for all Local Authorities can be found here (<https://www.london.gov.uk/what-we-do/environment/climate-change/surface-water/london-sustainable-drainage-proforma>).

Water Efficiency

66 The sustainability statement proposes that the proposed dwellings will have a maximum indoor water consumption of 105 l/person/day, in accordance with Policy 5.15 of the London Plan and draft London Plan Policy SI.5. The sustainability statement notes that non-residential elements of the development will be leased on a 'shell and core' basis with fitout by tenants at a later date. To ensure the proposed development meets the requirements of London Plan policy 5.15 and draft New London Plan Policy SI.5, water harvesting and reuse to reduce consumption of wholesome water across the entire development site should be considered. This can be integrated with the surface water drainage system to provide a dual benefit.

Urban Greening and Green Infrastructure

67 Urban greening should be embedded as a fundamental element of the scheme design, in line with London Plan Policy 5.10 and draft London Plan Policy G1 and G5. The proposed connections to local green space, via the green link, are positive and strongly supported. The calculated urban greening factor does not comply with the target of 0.4 for residential development, as set out in the draft London Plan Policy G5. The urban greening factor should be improved. Examples of improvements could include the replacement of green roofs with, intensive green roofs and the replacement of areas of amenity grassland for flower-rich grassland. If any trees are to be removed, a removal plan detailing the species, maturity and value of the tree should be provided. Detailed technical comments in respect of urban greening have been circulated to the Borough to be addressed in their entirety.

Transport

68 The Transport Assessment refers to the difference between trips assumed in outline permission and this phase – the methodology on how this was calculated is not clear nor the relation with mitigation already secured including triggers. The Transport Assessment should review the status of mitigation already secured and assess how this helps deliver policy objectives on public transport and healthy streets.

69 The Transport Assessment states that site has excellent links to the stops on Headstone Road and Harrow View, which is welcome. As these links to the stops are excluded from Active Travel Zone assessment, further information is required on the current and future Healthy Streets assessment of both these roads. Both these roads have speed limits of 30 mph and carry relatively high volumes of traffic, around 700 vehicles per hour in each direction rising to 800 in the forecast. To support sustainable travel, an improvement in Healthy Streets scores around these stops is expected, as part of this Phase or secured in relation to earlier phases.

70 The train stations are on the cusp of an acceptable walk distance from the site, and Harrow on the Hill is over 2 kilometres from site. Improvements to the routes to both of these

stations are a priority and necessary to support the mode share assumptions in the TA. Therefore, improvements need to be secured.

71 The application states the development will comply with draft London Plan cycle parking standards, which is welcome. Further information should be provided to ensure compliance with the London Cycle Design Standards, as well as the London Plan and draft London Plan standards. The proposed provision of 0.3 car parking spaces per dwelling is acceptable and the provision of Electric Vehicle Charging Points and Accessible Parking accords with London Plan Policy 6.13 and draft London Plan Policy T6.1. The Council should secure a Parking Design and Management Plan which details how cycle and car parking will be managed.

72 A total of 88 bus trips during the AM peak and 73 during the PM peak through additional demand is indicated for travel to Harrow on the Hill. The buses that serve the site need to be enhanced to meet the extra demand from this development. A financial contribution of £900,000 is requested to fund two extra peak services on H9, H10 or H14 for a period of 5 years. This is required to ensure extra bus capacity is in place prior to occupation of this phase to support forecast bus demand as main mode and to facilitate access to Harrow on the Hill.

73 The two stations that serve the site, Harrow and Wealdstone station and Headstone Lane station are between 900 and 1 kilometre, whilst Harrow-on-the Hill station is a bus ride away. The Transport Assessment assumes 50% of people travel to Harrow on the Hill by bus, but none by bus to Harrow and Wealdstone. Harrow and Wealdstone will attract 255 people during the AM peak and 210 during the PM peak, whilst Harrow on the Hill will attract 128 during the AM peak, and 106 during the PM peak. The Transport Assessment does not appear to assess impact at these stations. The Transport Assessment should be updated to assess the impact of these trips against observed use of these stations, using station usage data published by TfL. An assessment of impact on station capacity as well as line loading at these stations should be provided in accordance with Policy 6.3 of the London Plan and Policy T4 of the draft London Plan.

74 The outline Construction Logistics Plan is welcomed, and in accordance with London Plan Policies 6.3 and 6.14 and draft London Plan policies T4 and T7, this should be secured by condition.

Local planning authority's position

75 Harrow Council planning officers have advised they are currently assessing the planning application and subject to assessment, are targeting determination of the application at planning committee in December 2019.

Legal considerations

76 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

77 There are no financial considerations at this stage.

Conclusion

78 London Plan and draft London Plan policies on opportunity areas, land use, housing, affordable housing, urban design, residential quality, playspace, inclusive design, energy, flood risk, drainage, water efficiency, urban greening and transport are relevant to this application. The issues set out below must be addressed to ensure the proposal complies with the London Plan and draft London Plan:

- **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 Area Action Plan.
- **Affordable housing:** The provision of 40% affordable housing (with grant, by habitable room) is strongly supported. An early stage viability review must be secured as part of the Section 106 agreement in accordance with Policy H6 of the draft London Plan and the Affordable Housing and Viability SPC, and affordability must be confirmed.
- **Agent of Change:** Further information is required to demonstrate that consideration has been had to the Agent of Change principle due to the proximity of the proposed development to strategic industrial land.
- **Playspace:** Further information is required to justify the deficiency in playspace. A financial contribution should be agreed between the Council and the developer to improve any offsite location.
- **Urban design:** The broad layout and massing provides positive enhancements permeability of the site. The new public square and a series of well-defined street and building typologies add to the rich character of the development. No strategic design concerns are raised.
- **Energy:** Clarification is required in respect of the Be Lean carbon emissions savings and a low carbon heating method should be investigated. On-site savings from renewable energy technologies are required to be maximised. The detailed technical comments have been sent to the Borough to be addressed in their entirety.
- **Sustainable drainage and water efficiency:** Water harvesting and reuse to reduce consumption of wholesome water across the entire development site should be considered. A London Sustainable Drainage Proforma should be submitted
- **Urban greening:** The proposed connections to local green space, via the green link, are strongly supported. The proposed development's urban greening factor score should be increased, and details should be provided of any trees proposed for removal.
- **Transport:** The transport assessment should clarify the secured mitigation measures and measures required to mitigate impacts of the proposal. The impact of additional trips on station capacity and train line loadings should be assessed. Further detail is required to confirm cycle parking standards are achieved. Improvements to the routes to the nearby stations should be secured.

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