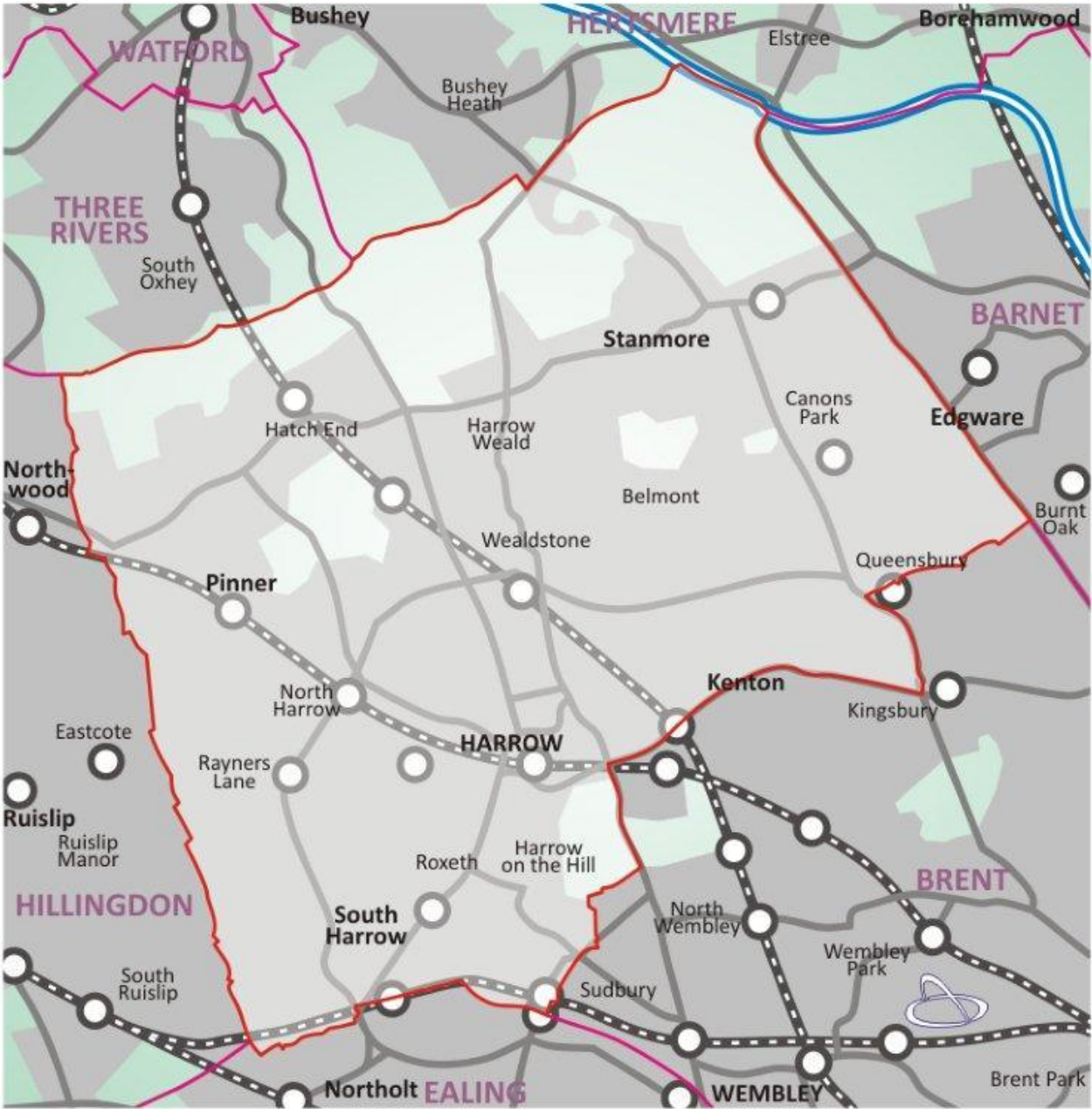
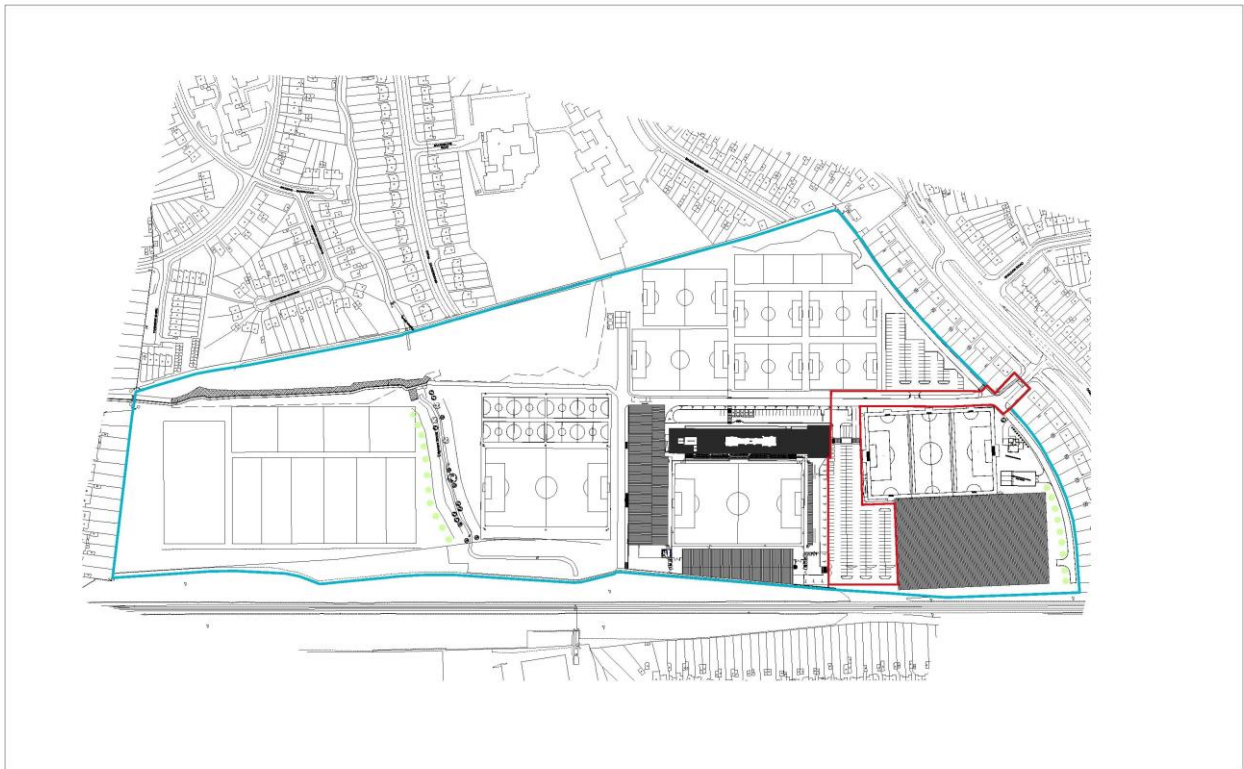


 = application site



<b>Prince Edward Playing Fields Camrose Avenue</b>	<b>P/4134/19</b>
--	------------------



Key  
— Site boundary  
— Ownership boundary

**Project:** The Hive, HA8 6AG  
**Title:** Multi Storey Car Park  
**Client:** The Hive Football Centre

**LRA:** London Borough  
of Harrow  
**Date:** 01.07.20  
**Scale:** 1:2500 @ A3  
**Project No.:** 30245001  
**Drawing No.:** 30245001/1  
**Drawn By:** MKR

**WSPUK Ltd**  
 20000000 House  
 10 - 16 Queen Street  
 London  
 EC4N 1TX  
 T 020 3848 2500



# LONDON BOROUGH OF HARROW

## PLANNING COMMITTEE

22<sup>nd</sup> July 2020

**APPLICATION NUMBER:** P/4134/19  
**VALID DATE:** 16<sup>th</sup> DECEMBER 2019  
**LOCATION:** PRINCE EDWARD PLAYING FIELDS, CAMROSE AVENUE, EDGWARE  
**WARD:** HARROW WEALD  
**POSTCODE:** HA8 6AG  
**APPLICANT:** FOOTBALL FIRST LTD  
**AGENT:** WSP INDIGO  
**CASE OFFICER:** NICOLA RANKIN  
**EXPIRY DATE:** 10<sup>th</sup> MARCH 2020

### PROPOSAL

Outline application for all matters reserved: Construction of five storey car park

### RECOMMENDATION A

The Planning Committee is asked to:

- 1) Refuse the application for the following reasons:
  - 1) The proposed development, by reason of a failure to propose measures to promote sustainable travel modes and to reduce the effects of travel by car and insufficient information to support the numbers of car parking spaces proposed, would result in unacceptable harm to the surrounding highway network through increased pressure on local parking amenity and on local transport infrastructure from excessive vehicle trips, contrary to the National Planning Policy Framework (2019), policies 6.3, 6.10 and 6.13 of The London Plan (2016), policies T1, T2, T4, and T6 of the Draft London Plan (2019), policy 1 of the Mayor's Transport Strategy, policy CS1 R of the Harrow Core Strategy (2012) and policies DM 42 and DM 43 of the Harrow Development Management Policies Local Plan (2013).
  - 2) The proposed development, in the absence of an up to date Preliminary Ecological Assessment and the close proximity to the adjoining Borough Grade II Site of Importance for Nature Conservation, fails to demonstrate that biodiversity value of the surrounding area would not be harmed, protected or enhanced, contrary to the National Planning Policy Framework (2019), policy 7.19 of The London Plan (2019), policy G6 of the Draft London Plan (2019) policy CS 1 E of the Harrow Core Strategy and policies DM 48 A b, DM 20

and DM 21 of the Harrow Development Management Policies Local Plan (2013).

- 3) The proposal, by reason of an unsatisfactory Flood Risk Assessment, fails to demonstrate that the proposed development would result in a net reduction in flood risk, be resistant and resilient to flooding, would not exacerbate the risk of flooding within the site or increase the risk and consequences of flooding elsewhere or provide a dry means of escape for the future users, to the detriment of the safety of the adjoining occupiers and the future users of the development, contrary to the National Planning Policy Framework (2019), policies 5.12 and 5.13 of The London Plan (2016), policies SI12 and SI 13 of the Draft London Plan (2019), Core Policy CS1 U of Harrow Core Strategy (2012) and policies DM 9 and DM 10 of the Harrow Development Management Policies Local Plan (2013).
- 4) The proposed development, by reason of its failure to demonstrate the impacts of the development on the adjacent Artificial Grass Pitches and the continued or enhanced community access to the site, would prejudice the ongoing use of the facilities needed for the proper functioning of the principal outdoor sports uses and would not promote enhanced community access to the site, contrary to the National Planning Policy Framework (2019), policies 3.1 and 3.19 of The London Plan (2016), policy S5 of the Draft London Plan (2019), core policy CS1 G and Z of the Harrow Core Strategy (2012) and policy DM 48 B b of the Harrow Development Management Policies Local Plan (2013).
- 5) The proposed development, by reason of insufficient information relating to the proposed development parameters, the Local Planning Authority is unable to determine the acceptability or otherwise of the principle of the development on the character and appearance of the site, surrounding area and designated open space, contrary to the National Planning Policy Framework (2019), policies 7.4 B and 7.6 B of The London Plan (2017), policies D1 and D3 of the Draft London Plan (2019), core policy CS 1 B and F of the Harrow Core Strategy (2012) and policy DM 18 C c and d of the Harrow Development Management Policies Local Plan (2013).

- 6) The proposed development, in the absence of an Air Quality Assessment, fails to demonstrate that the proposed development would be Air Quality Neutral and would have the potential to contribute to a deterioration in air quality in the locality, to the detriment of the future users of the site and wider area and the overall environmental quality of the London Borough of Harrow, contrary to the National Planning Policy Framework (2019), policy 7.14 of The London Plan (2016), policy of the SI 1 of the Draft London Plan (2019) and polices DM 1 and DM 12 of the Harrow Development Management Policies Local Plan (2013).

## **REASON FOR THE RECOMMENDATION**

The application is accompanied by out of date technical reports and as such officers are unable to make an informed assessment on the main material planning considerations of the application. The proposed development fails to comply with the development plan for Harrow in relation to matters of traffic and parking, biodiversity, flood risk, air quality, access to community sport and impact on the character and appearance of the area including the surrounding designated open space.

To allow the proposal to proceed would be detrimental to the borough in terms of setting an unacceptable precedent of policy non-compliance development with no supporting justification. Officer's consider that proposals for any increase in car parking without sufficient justification is unacceptable and is likely to add pressure (or will not improve it) to the surrounding Highway network in the form of congestion in both traffic and parking terms and there are no measures included that would seek to reduce the effects of car travel.

In the absence of an up to date ecological survey, officers cannot be certain whether the proposed development may have adverse implications for the biodiversity of the adjacent SINC, including, if present, any protected species and as such would cause unacceptable harm to biodiversity interests.

The proposal, by reason of an unsatisfactory Flood Risk Assessment, fails to demonstrate that the proposed development would result in a net reduction in flood risk, be resistant and resilient to flooding, would not exacerbate the risk of flooding within the site or increase the risk and consequences of flooding elsewhere or provide a dry means of escape for the future users, to the detriment of the safety of the adjoining occupiers and the future users of the development.

Due to insufficient information relating to the development parameters, officers are unable to determine whether the proposed development would have an acceptable impact or otherwise on the character and appearance of the site and area or the surrounding designated open space.

Following consultation with Sport England, the proposed development is considered to be unacceptable in principle, by reason of its failure to demonstrate the impacts on the adjacent Artificial Grass Pitches and the continued community access to the site and

would have the potential to prejudice the ongoing use of the facilities needed for the proper functioning of the principal outdoor sports uses.

The proposal fails to demonstrate that the development could be Air Quality Neutral, and as such would be detrimental to the environmental quality of the borough and its residents.

## **INFORMATION**

This application is reported to Planning Committee as it has been called in by a nominated member in the public interest. The application is therefore referred to the Planning Committee as it does not fall within any of the provisions set out at paragraphs 1(a) – 1(h) of the Scheme of Delegation dated 12th December 2018.

Statutory Return Type:	Major Development
Council Interest:	N/A
Net additional Floorspace:	17,000sqm
GLA Community Infrastructure Levy (CIL):	£1, 020, 000
Contribution (provisional):	
Local CIL requirement:	£nil

## **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. However, a condition could be added at the Reserved Matter Stage for evidence of certification of Secure by Design Accreditation for the development, had the proposal been otherwise considered acceptable.

## **1.0 SITE DESCRIPTION**

- 1.1 The Hive Football Centre (formerly Prince Edward Playing Fields) comprises former educational sports grounds, designated as Open Space and allocated for Community Outdoor Sports Use. It is now occupied by a football stadium with ancillary facilities and open-air grass and synthetic football pitches.
- 1.2 The wider stadium site (approx 17ha) is bound by the Jubilee Line railway to the west, with residential properties fronting Aldridge Avenue on the other side of the embankment, residential properties fronting Whitchurch Lane to the north and those on Camrose Avenue to the south. Those properties on Camrose Avenue have gardens that adjoin the site, the majority of which have chain mesh means of enclosure. To the south of those gardens, on the other side of a road is a large bund, which limits views into the site and the existing artificial floodlit pitches beyond it. To the east, the site adjoins residential properties along Buckingham Gardens and St David's Drive and Little Stanmore Nursery, First and Middle Schools.
- 1.3 The subject site is located to the south west of the site and to the rear of the south stand. It currently contains a surface level hard surfaced car park.
- 1.4 The section of railway embankment that adjoins the western site boundary is identified as a Site of Nature Conservation Importance.
- 1.5 Levels at the site fall from the north to the Edgware Brook, which crosses the site, and then rises again to Camrose Avenue.
- 1.6 The part of the site adjacent to the Brook is in Flood Zone 3a/3b (including an Environment Agency flood defence bund), with other parts of the site within Flood Zone 2.
- 1.7 The main vehicular access to the site is from Camrose Avenue, with secondary access (pedestrian only) from Whitchurch Lane.
- 1.8 The football stadium at the site is used by Barnet Football Club, a Football League side. The stadium has a maximum permitted attendance of 8500 which was granted under planning application P/2764/17.
- 1.9 There are 413 parking spaces on the site currently which is comprised of parking in the following areas:
  - 234 parking spaces in the main surface car park
  - 86 spaces in the triangular car park to the south of the site
  - 44 matchday/VIP spaces to the front of the East Stand and
  - 49 spaces on the two service road at the south of the site



- 1.10 The site is located adjacent to Canon's Park Underground Station which is served by the Jubilee Line. The PTAL rating for the site ranges from 0 (poor) to 3 (average), though the majority of the site is covered by a rating of 1a/1b.

## **2.0 PROPOSAL**

- 2.1 The proposal seeks outline planning permission with all matters reserved for construction of a five storey car park.
- 2.2 Indicative site plans, floorplans and elevations have been provided. The development would have a maximum floorspace of 17000 m<sup>2</sup>. The development is indicated to be five storeys in height with a maximum height of 17m AOD. However, the specific maximum footprint for the development has not been specified.
- 2.3 The proposed multi storey car park would have a total of 439 parking spaces which would be an uplift of 26 parking spaces across the wider site overall. However, it should be noted that the applicant has not confirmed whether other areas of parking outside of the multi storey parking area would be retained, noting that the proposed coach parking area (currently 86 car parking spaces), east stand spaces (44 car parking spaces) and service road spaces (49 car parking spaces) do not fall within the red line boundary and as such the Local Planning Authority have no influence on whether these spaces are retained or not as car parking spaces. In theory if the other parking areas were retained in addition to the spaces proposed in the multi storey car park, there could be a total of 618 car parking spaces on the site, resulting in an uplift of 205 parking spaces overall on the wider application site.
- 2.4 It is noted that the proposed indicative siting of the car park deck would necessitate the realignment of the approved stadium academy building granted under application P/2763/17 as well as the adjacent pitches to the north. These elements are not included within the red line application boundary and do not fall to be considered under this application. The realignment of both of these elements would require planning permission.
- 2.5 The applicant's supporting documents also outline that it is proposed that the existing car parking located to the east of the main entrances will be converted to the bus and coach parking area for 19 coaches (an uplift of 15 coaches). However, this area does not fall within the application site boundary outlined in red, and so does not fall to be considered by this application.

## **3.0 RELEVANT PLANNING HISTORY**

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

<b>Reference</b>	<b>Description</b>	<b>Decision</b>
EAST/148/01/OUT	Outline: football stadium, terraces,	Approved: 11 <sup>th</sup> April

	stand & clubhouse, floodlights to ground, artificial pitch & tennis courts, health & fitness facilities, parking, vehicular access from Camrose Avenue	2003
P/1087/03/DVA	Variation of condition 13 of planning permission East/148/01/OUT to provide revised parking layout	Approved: 29 <sup>th</sup> July 2003
P/898/03/CDP	Details of design and appearance of building and landscaping pursuant to condition 2 of outline planning perm. East/148/01/OUT for football stadium associated works	Approved: 04 <sup>th</sup> August 2003
P/0002/07	Redevelopment for enlarged football stadium and clubhouse, floodlights, games pitches, banqueting facilities, health and fitness facility, internal roads and parking	Approved: 08 <sup>th</sup> April 2008
P/1321/08	Alterations and internal changes to east stand and change of use of part of first floor of east stand from D2 (assembly and leisure) to primary care trust premises	Approved: 06 <sup>th</sup> October 2008
P/1226/09	S.73 application to vary condition 27 (development within the area liable to flood) attached to planning permission P/0002/07	Approved: 25 <sup>th</sup> August 2009
P/2022/09	Variation of condition 18 (external lighting) pursuant to planning permission ref: P/0002/07/CFU dated 8 April 2008 from 'All exterior lighting other than floodlighting shall be extinguished on any day not later than 22:30 hours, except lighting not more than 1m above the finished road or car park level that shall be extinguished not more than 60 minutes after the end of any match or event' to 'All exterior lighting other than floodlighting shall be extinguished on any day not later than 22:30 hours, except lighting not more than 1m above the finished road and car park level that shall be extinguished not more than 60 minutes	Approved: 06 <sup>th</sup> November 2009

	after the end of any match or event.'	
P/2257/09	Variation of condition 17 (floodlighting) pursuant to planning permission ref: P/0002/07/CFU dated 8 April 2008 from 'The floodlighting hereby permitted for playing surfaces shall only be used on any day up to 2200 hours except when evening matches are being played at the main stadium when floodlighting shall only be used up to 2300 hours' to 'The floodlighting hereby permitted for playing surfaces shall only be used on any day up to 2300 hours, until commencement of use of the playing surface of the main stadium, at which time floodlighting for the main stadium shall only be used on any day up to 2300 hours, and any other floodlighting within the site hereby permitted for playing surfaces shall only be used on any day up to 2230 hours'.	Refused: 29 <sup>th</sup> December 2009
P/2912/09	Variation of condition 17 (floodlighting) of planning permission ref: P/0002/07 dated 8 April 2008 from 'the floodlighting hereby permitted for playing surfaces shall only be used on any day up to 22.00 hours except when evening matches are being played at the main stadium when floodlighting shall only be used up to 23.00 hours' to 'the floodlighting hereby permitted for playing surfaces shall only be used on any day up to 22.30 hours except when evening matches are being played at the main stadium when floodlighting shall only be used up to 23.00 hours'; variation of condition 18 (external lighting) from 'all exterior lighting other than floodlighting shall be extinguished on any day not later than 22:30 hours, except lighting not more than 1m above the finished road or car park level that shall be extinguished not more than 60 minutes after the end of any match or event' to 'exterior lighting other than floodlighting shall be extinguished on	Approved: 15 <sup>th</sup> June 2010

	any day not later than 23.00 hours except lighting in the main car park which shall be extinguished not later than 23.30 hours. when holding a match or event, lighting not more than 1m above the finished road and car park lighting shall be extinguished not more than 60 minutes after the end of such match or event'	
P/1693/12	<p>Variation of condition 17 (floodlighting) of planning permission ref: P/0002/07 dated 8 April 2008 from 'the floodlighting hereby permitted for playing surfaces shall only be used on any day up to 22.00 hours except when evening matches are being played at the main stadium when floodlighting shall only be used up to 23.00 hours' to 'the floodlighting hereby permitted for playing surfaces shall only be used on any day up to 22.30 hours except when evening matches are being played at the main stadium when floodlighting shall only be used up to 23.00 hours'</p> <p>Variation of condition 18 (external lighting) from 'all exterior lighting other than floodlighting shall be extinguished on any day not later than 2230 hours, except lighting not more than 1m above the finished road or car park level that shall be extinguished not more than 60 minutes after the end of any match or event' to 'exterior lighting other than floodlighting shall be extinguished on any day not later than 23.00 hours except lighting in the main car park which shall be extinguished not later than 23.30 hours. when holding a match or event, lighting not more than 1m above the finished road and car park lighting shall be extinguished not more than 60 minutes after the end of such match or event'</p>	Approved: 10 <sup>th</sup> September 2012
P/2807/12	Non-material amendment to add a condition detailing approved plans to planning permission P/0002/07 dated	Approved: 27 <sup>th</sup> November 2012

	08/04/2008 for redevelopment for enlarged football stadium and clubhouse, floodlights, games pitches , banqueting facilities, health and fitness facility, internal roads and parking	
P/0665/13	Variation of condition 29 (approved plans - added through application P/2807/12) attached to P/0002/07 dated 08/04/2008 for 'Redevelopment for enlarged football stadium and clubhouse, floodlights, games pitches , banqueting facilities, health and fitness facility, internal roads and parking' to allow minor amendments to the stadium comprising: Phase 1: internal and external alterations to east stand including additional row of seats; increase in height, depth and capacity of west stand including camera position; reduction in capacity of standing areas; increase in height of floodlights and re-siting of southern floodlights; additional turnstiles, spectator circulation, fencing, food kiosks and toilets; alterations to parking areas. Phase 2: replace north stand with seated stand; reduction in capacity of standing area in southern stand; extension to rear of west stand to provide indoor spectator space (total stadium capacity not to exceed 5176 as previously approved)	Refused: 11 <sup>th</sup> September 2013  Appeal allowed: 19 <sup>th</sup> December 2014
P/4092/14	Single storey side to rear extension to the east stand to create an enlarged medical centre and box office security; provision of two internal chiller units and three internal air conditioning units	Approved: 23 <sup>rd</sup> March 2015
P/4096/14	First floor side extension to the east stand to create an enlarged banqueting suite and provision of a new entrance	Approved: 13 <sup>th</sup> April 2015
P/2004/15	Display one internally illuminated free standing sign	Approved: 02 <sup>nd</sup> July 2015
P/2191/15	Variation of condition 1 (drawing numbers) attached to planning	Approved: 20 <sup>th</sup> July 2015

	<p>permission P/0665/13 allowed on appeal reference APP/M5450/A/14/2215248 dated 19/12/2014 to allow for a larger North Stand and associated facilities than that approved by the original consent for an enlarged football stadium and clubhouse, floodlights, games pitches, banqueting facilities, health and fitness facility, internal roads and parking. Phase 1 involves internal and external alterations to the East Stand including an additional row of seats, an increase in the height, depth and capacity of the West Stand, including camera position, reduction in capacity of standing areas, increase in the height of floodlights, additional turnstiles, spectator circulation, fencing, food kiosks and toilets and alterations to the parking areas. Phase 2 involves the replacement of the North Stand with a seated stand, reduction in the capacity of the standing area in the South Stand and an extension to the rear of the West Stand to provide indoor spectator space</p>	
P/3255/16	Erection of temporary spectator stand adjacent to the academy pitch (training area a); footpath to provide pedestrian access to the temporary stand	Appeal allowed: 23 <sup>rd</sup> December 2016
P/5204/16	Variation of condition 1 (drawing numbers) attached to planning application P/0665/13 allowed on appeal under reference APP/M5450/A/14/2215248 dated 19/12/2014 to allow for a larger North Stand (increased height and depth, and larger bar area) and the provision of a building to facilitate a ticket office and turnstiles. The scheme allowed on appeal was for an enlarged football stadium and clubhouse, floodlights, games pitches, banqueting facilities, health and fitness facility, internal roads and parking. Phase 1 involved internal and external alterations to the East Stand including an additional row	<p>Refused: 23<sup>rd</sup> June 2017</p> <p>Appeal allowed Ref: app/m5450/W/ 17/ 3188361</p>

	of seats, an increase in the height, depth and capacity of the West Stand, including camera position, reduction in capacity of standing areas, increase in the height of floodlights, additional turnstiles, spectator circulation, fencing, food kiosks and toilets and alterations to the parking areas. Phase 2 involved the replacement of the North Stand with a seated stand, reduction in the capacity of the standing area in the South Stand and an extension to the rear of the West Stand to provide indoor spectator space extension	
P/3352/16	Non-material amendment to planning permission reference P/2191/15 dated 17/07/15 to increase the depth of the north stand at ground floor level, increase the height of the north stand and increase the width of the north stand	Refused: 25 <sup>th</sup> August 2016
P/2764/17	Erection of a new South stand; new medical facilities, community facilities and commercial floorspace to the rear of the south stand; replacement of East stand seating with terraces; single deck above existing car park and increase in the total capacity of the stadium from 5,176 to 8,500	Granted 28 <sup>th</sup> February 2018
P/4485/17	Variation of Condition 1 (Approved plans) attached to planning permission P/0665/13 allowed on appeal reference APP/M5450/A/14/2215248 dated 19/12/14 to allow for a larger north stand and associated facilities than approved by the original consent	Granted 2 <sup>nd</sup> November 2018
P/2763/17	<i>Erection of an indoor academy building with an indoor 3G pitch, a new 11-a-side 3G pitch, eight 5-a-side pitches, a new indoor sports hall, a permanent ticket-office and club-shop, a permanent academy spectator stand and WC and snack shop porta cabins.</i>	Granted 18 <sup>th</sup> July 2019
P/1564/20	Outline application for Access Only:	Decision Pending

	Redevelopment to provide four storey building with basement level comprising of sporting higher education facility, hotel, medical diagnostic centre; associated works	
--	--	--

#### 4.0 **CONSULTATION**

- 4.1 A total of 122 consultation letters were sent to neighbouring properties regarding this application.
- 4.2 The public consultation period expired on 06 January 2020. No responses were received.
- 4.3 The site was advertised for the following reasons:
- Press Advert: Major Development /Departure from Development Plan Expiry: 9/01/2020
  - Site Notice: Major Development /Departure from Development Plan Expiry: 20/02/2020

#### Statutory and Non Statutory Consultation

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

Consultee and Summary of Comments
<p><b>Greater London Authority:</b> I have assessed the details of the application and, given the scale and nature of the proposals, conclude that the proposal does not give rise to any strategic planning issues. The Council should however engage with Transport for London and consider any comments made by Transport for London on the above application.</p> <p><b>Transport for London:</b></p> <p><b>Proposed Development and Site Context</b></p> <p>The proposed development is for the construction of a 400 space multi-storey car park within the Hive Football Centre; it is part of a series of redevelopment proposals for the Centre which are subject to separate planning applications, the most recent was consented in June 2018. The overall proposals include a stadium expansion, new 'South Stand' and replacement 'East Stand' to increase seating capacity from 5,200 to 8,500 seats, as well as, a Hive Academy, indoor sports hall and mixed-use ancillary facilities. The multi-storey car park replaces the car parking lost by the redevelopment proposals.</p> <p>The site is bound to the north by Whitechurch Lane and to the south by Camrose</p>



Avenue, both of which are borough roads. The Jubilee line bounds the site to the east. The nearest section of the Strategic Road Network (SRN) is A5 Burnt Oak Broadway, located approximately 1.4km to the east of the site.

The site has a Public Transport Access Level (PTAL) of 3/2, on a scale of 0-6b, where 6b is highest. Jubilee line stations' Canons Park Station and Queensbury Station are 190m north, and 850m south, respectively. Bus stops are on Whitechurch Lane and Camrose Avenue, and are served by three strategic routes; service no. 340, 79, 186, and 288.

### **Transport Assessment**

The Transport Assessment (TA) submitted to assess the transport implications of the proposals is over 4 years old, and therefore has not been updated to reflect current national, London or local policy. This application should be supported by a TA prepared in accordance with TfL's Healthy Streets TA best practice guidance. Intend to publish London Plan Policy T2 requires developments to follow the Healthy Streets Approach, which aims to improve air quality, reduce congestion and make attractive places to live, work and do business by encouraging active travel, public transport use and mode shift from car travel. An Active Travel Zone (ATZ) assessment should be prepared required and submitted for review by TfL and the Council prior to determination. The ATZ assessment should identify measures for off-site improvements which would benefit the site as well as the local area. ATZ assessments require a site visit, and at the time of writing, this is not possible due to government restrictions. Therefore, TfL would accept a desktop assessment and welcome further discussion with the applicant on how to achieve this.

### **Access, Healthy Streets and Vision Zero**

The main access for pedestrians and vehicles will remain as the existing site on Camrose Avenue, to the south end of the site. Whitechurch Lane offers a secondary pedestrian access to the north. It should be demonstrated how the proposals meets the Healthy Streets indicators to meet Intend to publish London Plan Policy T2.

It should also be demonstrated how the development meets the Mayor's Vision Zero agenda. There is no continuous footway from Camrose Avenue into the site which poses a risk for pedestrians diverting onto the road and a potential road safety issues. The pedestrian environment at the gateway of the site should be improved to accommodate for the rise in visitors. Healthy Streets and Vision Zero measures should be discussed with TfL, but ultimately are to be agreed by Harrow Council as the highway authority. This includes measures to manage traffic movements to and from site to avoid conflicts between vehicles movements, cyclists and pedestrians.

### **Car Parking**

As part of the redevelopment proposals consented in June 2018, 100 car parking spaces were lost to make room for the redevelopment works, and a further 100 spaces are to be re-purposed for bus and coach parking. The proposed car park will rationalise all car parking on site, and it is stated that the net overall quantum of spaces is not increasing. It is not clear from the TA but the quantum of spaces

appears to be based on the consented no. of spaces within planning permission ref: P/0002/7 and P/2191/15, which is:

- 10 coach parking spaces
- 300 car parking spaces, 19 parking spaces for officials, 7 disabled spaces
- 100 cycle parking spaces
- 20 motorcycle spaces

From a strategic transport perspective, the principle of a 400 space car park is not in line with the Mayor's Transport Strategy or the Policy T.6.4 Hotel and leisure uses parking of the Intend to publish London Plan which states that for PTAL 0-3 locations;

*'schemes should be assessed on a case-by-case basis and provision should be consistent with the Healthy Streets Approach, mode share and active travel targets, and the aim to improve public transport reliability and reduce congestion and traffic levels.'*

Providing this level of parking does little to encourage active travel to the site or reduce road traffic congestion. The justification for re-providing all spaces is based on an increase in stadium capacity from 5,176 to 8,500 seats (3,324 additional) however, the no. of attendees for Barnet FC games is expected to remain similar to the 2015/2016 season and this is therefore not an acceptable reason for the high quantum of spaces proposed.

Reducing car dependence of non-residential development is essential to help achieve sustainable development in London, which already suffers from some of the highest levels of congestion in the UK. Therefore, to alleviate this issue, people are encouraged to use travel actively, rather than by car travel, where possible. The nearest part of the Strategic Road Network is the A5 and is congested during weekday and weekend peaks and is a major corridor of growth. The impact of this car parking on the strategic road network should be assessed in the TA.

TfL would ideally want the quantum of parking spaces to be reduced significantly, and a car-lite approach should be taken. The level of parking should reflect mode shift targets supported by the London Plan. Notwithstanding the objection to the principle of development, Intend to publish London Plan Policy T6.4D would require a minimum of 6% of the 400 spaces to accommodate accessible car parking spaces to accord with Sport England guidance. All operational car parking must provide infrastructure for electric vehicles to conform with Intend to publish London Plan Policy T6.C. and a Parking Design and Management Plan should be secured by condition.

The multi-storey car park is located near London Underground (LU) railway tracks and car headlight glare can pose a safety issue for passing trains. The car park is to be designed to reflect and retract the lights from car headlights, this should be demonstrated and approved by Harrow Council in consultation with TfL or LU prior to construction.

### **Coach Parking**

The existing car parking spaces to the east of the main entrance are to be converted into a coach parking area which will result in additional coach trips to

the site. A Coach Parking Management Plan should be provided and secured by condition. It should set out the expected coach arrivals and proposed management system.

### **Cycle Parking**

New developments must take every opportunity to overcome barriers to cycling and good quality cycle parking is a selling-point. The current site has 50 Sheffield stands in the cycle parking area to the south-east corner of the stadium with no new spaces proposed. The provision of Sheffield stands meets the London Cycle Design Standards (LCDS), however, the applicant should ensure the cycle parking is of high quality, in good condition, is well-located, secure, visible and fit-for purpose.

End of journey (shower and changing) facilities should be provided for staff that travel to the site by sustainable modes.

### **Traffic Modelling and Trip Generation**

TfL preference is to minimise impact on the Strategic Road Network by encouraging mode shift. For the modelling to be acceptable the models should be prepared in accordance with TfL Traffic Modelling Guideline and Model Audit Process. The modelling should be based on the most up to date data available including observed traffic data and forecast future demand. This should be where use of the car park coincides with peak travel on the local road network.

The scope of impact depends on forecasting traffic assignment from the car park. The junction modelling and trip generation analysis is based on 2016 traffic surveys and 2013 trip generation data. TfL is concerned about the traffic impact on the A5, to assess impact on the local highway network, TfL input relates to operation of traffic signals and bus services and Harrow Council's advice should be followed. TfL would need to be provided with a local traffic assignment to determine which junctions need to be modelled. The applicant should discuss this further with TfL.

The existing site trip generation is based on Brentford FC Stadium Travel Plan, 2013 which does not reflect recent travel patterns. The proposed match day modal split suggests the percentage of existing supporters arriving by car will reduce by 10% to around 48%. This is not ambitious enough, and as already stated does not reflect active travel targets in Policy 1 of the Mayor's Transport Strategy and Intend to publish London Plan Policy T6.

During the assessment peak hour, the development would attract 166 new pedestrian trips and 31 new cyclist trips which are expected to be split between both entrances, although the exact split is unknown. The impact on the LU network and bus network is expected to increase with 565 LU trips and 300 extra bus users. It is concluded that this increase can be accommodated without mitigation, however, no justification is provided. It is recommended that an updated assessment is undertaken to provide a realistic, site specific mode split, based on data no more than 5 years old. Once this is provided a view will be taken to understand if the capacity of LU and bus services can accommodate demand.

### **Travel Planning and Delivery and Servicing**

Due to the nature of this application a Travel Plan and Delivery and Servicing information has not been provided. It is assumed that a Travel Plan and Delivery and Servicing Plan (DSP) have both been secured by condition as part of the wider site redevelopment applications which should be approved by Harrow Council.

### **Construction**

No construction details have been provided and TfL expect a Construction Logistics Plan to be prepared and agreed by Harrow Council in consultation with TfL. TfL have particular interest in vehicle timing, routing and minimising disruption to public transport.

### **Mayoral Community Infrastructure Levy 2 (MCIL2)**

The extent of the increase in development will be subject to Mayoral Community Infrastructure Levy 2 (MCIL 2), which was introduced on 1st April 2019. The Mayor has arranged boroughs into three charging bands. The proposed development is in London Borough of Harrow where the charging rate is £60 per square metre of floorspace.

### **Summary**

To summarise, the principle of a 400 space car park does not conform with Policy 1 of the Mayor's Transport Strategy, Policy T2 Healthy Streets or Policy T6 Car Parking of the Intend to publish London Plan. The Transport Assessment has not been prepared in line with current London policy and should be updated. A revised trip generation assessment should be completed, and the impact on the A5 Strategic Road Network should be analysed.

**LBH Highways Authority:** This application is accompanied by a transport assessment however it was written in 2016 and last amended in 2017 meaning that it does not take account of policy revisions to the London Plan, Mayors Transport Strategy, NPPF and TfL Transport Assessment guidance. All documents have a strong emphasis on sustainable travel and ask applicants to promote non-car travel therefore any proposal for car parking should focus on improving access to sustainable travel options and minimise the need for private car use.

New sporting venues in London are generally designed to be car free or car-lite in order to encourage non-car travel. Whilst this isn't an entirely new development, this is an opportunity to design a venue that seeks to fulfil current aspirations in terms of transport policy.

Parking levels need to be justified beyond a simple intention to re-provide an existing number of spaces. This should be done through a Healthy Streets style transport assessment supported by a travel plan. The document should include a review of accessibility of the venue and what changes could be made to improve this; a study of current travel behaviour and future goals including how these could be achieved; a study of parking demand and how this could potentially be reduced – guidance on the full content of transport assessments is available on

the TfL website.

At present, we cannot support this proposal as it does not contribute to meeting the aims of the Mayor's Transport Strategy to reduce car travel in London. Proposals for car parking are likely to add pressure (or will not improve it) to the surrounding Highway network in the form of congestion in both traffic and parking terms and there are no measures included that would seek to reduce the effects of car travel.

Additional Comments: The comments from TfL are very similar to ours; it is apparent that both authorities consider this application provides insufficient information to make this proposal acceptable. The main issue is policy related; the proposal seeks to provide a car parking facility that exceeds the maximum levels permitted by the Intend to Publish (ITP) London Plan and as a consequence does not positively contribute to the aims of the Mayor for London's Transport Strategy, both policies that the Council supports and intends to comply with. As a borough we are tasked with helping to achieve the aim of 80% of journeys in London being undertaken by sustainable modes.

In particular, policy T6 Car Parking (ITP London Plan) states;

**Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.**

Furthermore, policy T6.4 Hotel and Leisure Uses Parking (ITP London Plan) continues;

**B In locations of PTAL 0-3, schemes should be assessed on a case-by-case basis and provision should be consistent with the Healthy Streets Approach, mode share and active travel targets, and the aim to improve public transport reliability and reduce congestion and traffic levels.**

In order to justify a deviation from the policies, it would be necessary for the applicant to demonstrate a genuine need but that has not been done. The increased stadium capacity does not automatically result in an uplift in car journeys furthermore, actual attendance increases are not expected at this stage or any time soon. If attendance does increase, it would be more appropriate to have measures in place from the outset that encourage sustainable travel rather than attempt to facilitate car travel by increasing car parking. Good travel habits need to be established at an early stage. We can consider the examples set by other London venues such as the Emirates Stadium (Arsenal FC) (ptal 4-6b) and Tottenham Hotspur FC (ptal 3-4) – both have been redeveloped and are marketed as car free venues. Both attract much higher attendance figures and whilst they do have better access to public transport this does serve to demonstrate that a similar venue can operate successfully without large amounts of car parking.

It would also be necessary to demonstrate how increased sustainable travel could be encouraged and it is acknowledged that a travel plan was submitted and approved as part of a previous application. However, it is a complete conflict to then propose increased car parking on-site no matter how small an increase.

To allow this proposal to proceed would be detrimental to the Council in terms of setting a precedent of policy non-compliance with no supporting justification. Failure to meet the policy requirements can result in negative highway impacts and definitely will not address the need to make improvements to the existing situation (policy T6.4 B).

**LBH Drainage Authority:** With regards to the above planning application, please note that the site is identified within fluvial flood zone 2 & 3 according to Environment Agency flood maps and also within surface water flood zone 3a & 3b according to our surface water flood maps. The site is at a highest risk of flooding.

We can confirm that **insufficient information** is provided in the Flood Risk Assessment submitted by the applicant. Detailed drainage strategy in line with our requirements attached should be submitted, especially the volume of surface water storage proposed.

Please note that the proposed development is restricted to a discharge rate of 5l/s/ha and 40% allowance for climate change should be considered.

**Environment Agency:** I can confirm that we have no comments to make in relation to this application.

**LBH Biodiversity:** It would appear that in relation to ecological matters the applicant is attempting to rely upon a not very satisfactory Preliminary Ecological Assessment conducted in September in 2017.

I recall pointing out its deficiencies at the time, not least the failure to undertake a desktop survey of existing records for the site and its vicinity which resulted in the applicant failing to take account of the adjoining SINC, as well as suggesting possible ecological enhancement along the Edgware Brook although I can't find a record of my comments at the time either in Civica or in my files.

I note that in the bundled supporting documents – mostly prepared in support of these earlier applications - it is claimed that the relevant consultants have reviewed those documents and confirmed that the conclusions are relevant to this application. However, there seems to be no statement from these consultants to confirm this or indeed to say why they are relevant to the present application.

I would not be willing to accept a deficient Preliminary Ecological Assessment as satisfactory in relation to the present application even were it well past its expiry date.

The applicant will either need to withdraw and resubmit or negotiate whilst they arrange for provision of the following.

(1) An up to date Preliminary Ecological Assessment which takes full account of an assessment of a search of site, species and habitat from within a 2 km buffer around and including the development site

(2) Any follow up surveys for which this indicates a need with particular regard to direct and indirect impacts of the current proposals on the site, its surroundings and the ecological network of which it forms part

(3) A detailed assessment of those impacts and how their effects might be minimised and mitigated

(4) An identification of definite proposals for delivering appropriate mitigation and biodiversity gain to meet the requirements of national, regional and local planning policies with regard to the protection and enhance of biodiversity and access to biodiversity

Subject to the on site and desktop survey findings, consideration should be given to both the demolition/construction phases and the subsequent operation of the site, to bats, birds and other species either occurring on the site or its surroundings, particular the SINC and how appropriate gain might best be delivered.

I would strongly suggest that the applicant gives consideration to the adoption of measures to provide a living roof and sections of green wall to the building.

As part of satisfying the above requirements, the applicant should give consideration as to how they might enhance the site's biodiversity, landscaping and climate mitigation value in a strategic manner within which any further development could be integrated.

Until we have this information, we won't be able to assess whether application would amount to sustainable development. As matters stand I would only be able to recommend refusal.

**Sport England:** Thank you for consulting Sport England on the above planning application. The site is considered to constitute playing field, or land last used as playing field, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). As such Sport England is a statutory consultee.

Sport England has sought to consider the application in light of the National Planning Policy Framework (particularly Para. 97) and against its own playing fields policy. Unfortunately there is insufficient information to enable Sport England to adequately assess the proposal or to make a substantive response. Please therefore could the following information be provided as soon as possible:

1. The proposed development would appear to result in the Artificial Grass Pitches (AGP's) adjacent to the proposed car park being re-orientated but no further details of this has been submitted, such as phasing and where existing users would play while the AGP's would be unusable. Please can these details be submitted so that Sport England can understand the impact on community sport.

2. In relation to users of the proposed car park, could the applicant/their agent confirm whether this would be free of charge for those using the AGP's and other sport facilities available for community use at the site?

Sport England's interim position on this proposal is to submit a **holding objection**. However we will happily review our position following the receipt of all the further information requested above. As I am currently unable to make a substantive response, in accordance with the Order referred to above, the 21 days for formally responding to the consultation will not commence until I have received all the information requested above.

**LBH Policy:** The application site is noted within the Local Plan as being designated Open Space. Open space is also recognised within the draft New London Plan (2019) (Intend to Publish Version), specifically through Policy G4.

With regard to the development itself, it would be a substantial footprint within the site and located on the existing car parking area between the astro training turfs and the existing stadium. Notwithstanding the fact that the land in question is hardstanding to provide for a car park, it is nonetheless designated as open space, and will be treated as such.

The National Planning Policy Framework (2019) places great weight in protecting open space.

Paragraph 97. States that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

At a London wide level, the draft New London Plan (2019) (Intend to Publish Version) provides policy seeking to protect Open Space, by way of Policy G4. Policy G4 requires development plans to undertake needs assessments of the boroughs open space stocks, and to include appropriate designations and policies for their protection. LB Harrow have, by way of the PPG 17 study under taken an open space needs assessment at a borough wide level. This assessment was undertaken in 2011. The PPG17 Study identifies that in 2010 there was a total deficiency of 117ha of land, which would rise to 139ha in 2026. Whilst this document is somewhat dated, there is no evidence to suggest that in quantative terms, the document is inaccurate. The current local plan has a specific policy (detailed below) in relation to Open Space, and identifies land that is designated as such within the Local Plan Policy Maps.

When considering specific development proposals, the draft New London Plan (2019) (Intend to Publish Version) sets out the following through Policy G4;

- 1) Not result in a the loss of protected open space
- 2) where possible create areas of publicly accessible open space, particularly in areas of deficiency.

It is clear from the proposed development that the proposed development would result in a loss of open space that is protected under the Local Plan. Furthermore, the proposed development would not result in the creation of publically open space, indeed it would result in a loss, in an area of an identified deficiency.

Any discussion regarding public access to the open space as a result of the application will be discussed later within the response.

For this reason, the Harrow Core Strategy (2012) directs housing growth to previously developed land, rather than to exacerbate this projected loss of the plan period (it is acknowledged that whilst this scheme does not propose housing development, it nonetheless proposes development that would result in a net loss of open space). The Core Strategy 2012 goes onto state that with the exception of small scale ancillary facilities needed to support or enhance the proper functioning of open space, development will not be permitted on designated open space as identified on the Harrow proposals map. There is a presumption against any net loss of open space, regardless of ownership and accessibility.

Following on from the Core Strategy (2012) position, Policy DM18 (Protection of Open Space) provide guidance on developments that would have an impact on open space. It is clear that DM18 would not support development that results in a net loss of Open Space, however would support the reconfiguration of open space. The proposed development would result in a significant amount of designated open space being lost, which is in direct conflict with both the draft New London Plan (2019) (Intend to Publish Version), the Harrow Core Strategy (2012) and also the Harrow Development Management Plan Local Policies (2013).

Turning to the proposed development specifically, it seeks to construct a five storey carpark on open space. In terms of the principle of development, this relates to the footprint of the scheme, with matters of height, bulk, scale etc considered later in the report. The planning policy maps indicate that the entire



site is located within open space designation, which includes internal roads, the stadium and the existing car park. Therefore, it is clear that the proposed development would be erected on designated open space. Whilst there is a presumption against the development of designated open space, that would result in a net loss of that open space. However, the circumstances of each case must be taken into consideration.

It is noted that the current site where it is proposed to erect the car parking structure, is set out in tarmac and used as car parking for the existing facility. By reason of this, the proposed development would result in no further hardstanding that was existing in terms of footprint, rather a structure with a vertical emphasis. Looking at the uses of Open Space, the current development site does not meet any of the expected open space uses. Specifically, it is noted that the existing use would not comprise a park and garden, play areas, amenity space, natural conservation site, playing pitches / sport grounds, allotments etc. Furthermore, by reason of the hardstanding nature of the existing site, it offers little benefit to drainage / flood risk, ecology / biodiversity or even visual relief around buildings. In terms of the listed benefits / uses for designated open space, it is considered that the existing car park provides limited benefit, and that the proposed multi-level car parking would not result in a demonstrably worse outcome to open space than that which exists currently.

Notwithstanding the above, a sporting use of the site is still only one function that open space would provide. Designated Open Space provides for more than recreation opportunities, such as urban form breaks, ecology / biodiversity opportunities and also providing future recreation opportunities as LB Harrow and London as a whole attempt to provide for the necessary housing required.

Whilst it is clear that there would be a net loss of open space, and therefore a conflict with DM18A, the proposed development would also find some favour under DM18C. Specifically, it is noted that the open space is primarily utilised as a football facility, providing a stadium, practice pitches (artificial) and also open grass land that is utilised as natural grass playing fields. As part of the existing site, it could therefore be argued that the proposed parking structure may assist in facilitating the proper functioning of the open space. The site has a public transport accessibility level (PTAL) ranging from 0 (Worst) to 3 (average). However, it is noted that the majority of the site is either 1a or 1b, which are both extremely poor. By reason of this, and the nature of the use, the premise requires a certain quantum of car parking for the use to operate. Ancillary parking is considered an appropriate use on site. However, the quantum of this would need to be found acceptable to the Highways Authority, and also the weighing up of the planning balance of the application.

In terms of the proposed development and the impact that it would have on the existing sports facility, this would need to be considered against draft new London Plan (Intend to Publish Version)(2019) Policy S5 (Sports and recreation facilities). It is clear that sport and recreation is supported, however, would need to be considered against policies such as Open Space (Policy G4). However, it does not noted that specialist sporting venues and stadiums also have a role to play in providing facilities and enabling wider access to sport, as well as having an important cultural value (para 5.5.5). The Hive is a dedicated, purpose built stadium with required ancillary structures, such as gymnasium, stadium for viewing football, and training / practice pitches and parking.

Locally, DM48 provides policy in relation to enhancing outdoor sports facilities.

This policy requires that community access be provided, but also that there would be no conflict with among other things, Open Space Policies. Development Management colleagues would provide an assessment against the remainder of this policy. However, it is clear that there would be a conflict from the outset with DM48A(a). However, as discussed above, it is considered that the proposed function is unlikely to have any more detrimental impact on the use or benefits of the existing open space.

It is considered that in this instance, the principle of building a multi-level car parking structure, above the existing level car parking area, is acceptable in principle.

**Greater London Archaeological Advisory Service:** Recommend no archaeological requirement

**London Underground:** No objection to the principle of the development but there are a number of potential constraints on the redevelopment of the site situated close to railway infrastructure. Therefore, it will need to be demonstrated to the satisfaction of LUL engineers that:

- Our right of support is not compromised
- The development will not have any detrimental impact on the structures either in the short or the long term
- The design must be such that the loading imposed on our structures is not increased or removed
- We offer no right of support to the development or the land.

Therefore, we request that the grant of planning permission be subject to conditions to secure detailed design and method statement for each stage of the development.

## **5.0 POLICIES**

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

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

5.2 The Government has issued the National Planning Policy Framework [NPPF 2019] sets out the Government’s planning policies for England and how these should be applied, and is a material consideration in the determination of this application.

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

- 5.4 While this application has been principally considered against the adopted London Plan (2016) policies, some regard has also been given to relevant policies in the Draft London Plan (2019), 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.
- 5.6 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 and a summary within Informative 1.

## **6.0 ASSESSMENT**

6.1 The main issues are:

- Principle of Development
- Character and Appearance of the Area
- Residential Amenity
- Traffic, Safety and Parking
- Biodiversity and Air Quality
- Drainage and Flood Risk
- Equalities Implications
- S17 Crime & Disorder

### **6.2 Principle of Development**

6.2.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan 2016: 7.18, 3.16, 3.19
- The Draft London Plan 2019: G4, S4, S5
- Harrow Core Strategy 2012: CS1 F, Z
- Harrow Development Management Policies Local Plan (2013):DM18, DM48
- Site Allocations DPD: Site MOS5
- PPG 17: Open Space Needs Assessment

#### Open Space

6.2.2 The only issues to be considered at this Outline stage are the general principles of whether this type of development would be acceptable in this location, and

whether this amount and scale of development would be acceptable. If Outline planning permission is approved, more detailed proposals will be submitted as Reserved Matters applications; and also as applications to discharge any other conditions that are attached to the Outline Planning Permission.

- 6.2.3 The application site is noted within the Local Plan as being designated Open Space. Open space is also recognised within the draft New London Plan (2019) (Intend to Publish Version), specifically through Policy G4. With regard to the development itself, it would be a substantial footprint within the site and located on the existing car parking area between the astro training turfs and the existing stadium. Notwithstanding the fact that the land in question is hardstanding to provide for a car park, it is nonetheless designated as open space, and will be treated as such.
- 6.2.4 Policy DM18 (Protection of Open Space) provide guidance on developments that would have an impact on open space. It is clear that DM18 would not support development that results in a net loss of Open Space, however would support the reconfiguration of open space. The proposed development would result in some designated open space being lost, which is in direct conflict with both the draft New London Plan (2019) (Intend to Publish Version), The Harrow Core Strategy (2012) and also the Harrow Development Management Plan Local Policies (2013). Whilst there is a presumption against the development of designated open space, that would result in a net loss of that open space, the circumstances of each case must be taken into consideration.
- 6.2.5 In terms of the principle of development, this relates to the footprint of the scheme, with matters of height, bulk and scale considered later in the report. The proposed plans indicate that the development would be constructed over an existing surface level car park and as such would result in no further hardstanding than was existing in terms of footprint. The site does not meet any of the expected open space uses such as amenity space or recreational space and offers little benefit to drainage / flood risk, ecology / biodiversity or even visual relief around buildings. In respect of visual relief, it is also acknowledged there is an extant planning permission for the construction of an academy building adjacent to this site which would have a height up to 18 metres and if constructed would obscure any views of the structure here from the southern part of the site.
- 6.2.6 Although there would be some conflict with policy DM 18 A and policy DM 48A, policy DM 18C would weigh in favour of the proposal. The open space is primarily utilised as a football facility, providing a stadium, practice pitches (artificial) and also open grass land that is utilised as natural grass playing fields. Given the relatively low PTAL rating across the site ranging from 0 to 3, it is accepted that the use requires a certain quantum of parking to operate and ancillary parking is considered to be an appropriate use. However, the overall acceptable quantum of parking would require further consideration and assessment under other policies of the development plan and this is discussed in more details in the highways and parking assessment section of this report.

- 6.2.7 In conclusion, whilst there would be some conflict with open space protection policies, it is considered that the proposed function is unlikely to have any more detrimental impact on the use or benefits of the existing open space. The proposal would also assist in facilitating the proper functioning of the open space. The principle of the multi storey car park, above the existing surface level car parking area is therefore considered to be acceptable.
- 6.2.8 Impact on Existing Sports Facilities
- 6.2.9 In terms of the proposed development and the impact that it would have on the existing sports facility, this would need to be considered against draft new London Plan (Intend to Publish Version) (2019) Policy S5 (Sports and recreation facilities). Policy S5 seeks to retain and enhance access to sporting facilities. As outlined in the Draft London Plan (2019) specialist sporting venues and stadiums have a role to play in providing facilities and enabling wider access to sport, as well as having an important cultural value (para 5.5.5). The Hive is a dedicated, purpose-built stadium with required ancillary structures, such as gymnasium, stadium for viewing football, and training / practice pitches and parking.
- 6.2.10 London Plan Policy 3.19 (Sports Facilities) states that development proposals that increase or enhance the provision of sports and recreation facilities will be supported. Where sports facilities developments are proposed on existing open space, they will need to be considered carefully in light of policies on protecting open space.
- 6.2.11 Policy MOS5 of the Site Allocations Local Plan allocates the site for community outdoor sports use. The commentary to that policy states that this allocation supports such further outdoor sport development as may be required to enable the success of this important community facility. Development must make provision for community access to facilities and be consistent, in terms of design, siting and any other impacts, with the amenity of neighbouring residential occupiers.
- 6.2.12 The site is designated by the Core Strategy as falling within the Kingsbury and Queensbury Sub-Area. Two of the area objectives for that sub-area are to:
- Continue to promote Prince Edward playing fields as a centre of sports excellence; and
  - Maintain community access to sport and recreation facilities and encourage enhancement
- 6.2.13 Locally, policy DM48b, also outlines that proposals for uses that would support outdoor sporting uses will be supported provided they do not displace or prejudice facilities needed for the proper functioning of the principal outdoor sport uses.
- 6.2.14 The Design and Access Statement accompanying the application outlines that the approved Academy building (Ref: P/2763/17) and the sports pitches to the north of the subject site do not align with the main stadium. It outlines that the intention is to rotate the pitches and the previously approved academy building in order to ensure they align with the stadium which would in turn free up space for

the siting of the proposed multi storey car park. However, the adjacent land including the sports pitches do not fall within the red line application site boundary and the re-orientation of the pitches and academy building would require new planning permissions.

6.2.15 The application has been referred to Sport England who has raised an objection to the principle of the development due to the lack of information provided in respect of car park charges for community users as well as the impact of realigning the sports pitches on community sport. Sport England note that *“the proposed development would appear to result in the Artificial Grass Pitches (AGP’s) adjacent to the proposed car park being re-orientated but no further details of this has been submitted, such as phasing and where existing users would play while the AGP’s would be unusable.”*

6.2.16 In this regard, the proposed development is considered to be unacceptable in principle, by reason of its failure to demonstrate the impacts on the adjacent Artificial Grass Pitches and the continued community access to the site and would have the potential to prejudice the ongoing use of the facilities needed for the proper functioning of the principal outdoor sports uses and would not promote enhanced community access to the site.

### **6.3 Character and Appearance of the Area**

6.3.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan 2016: 7.4, 7.6
- The Draft London Plan 2019: D1, D2, D3
- Harrow Core Strategy 2012: CS1 B, F
- Harrow Development Management Polices Local Plan (2013): DM1, DM 18

6.3.2 In respect of character and open space, policy DM 18 C c/d/f outlines that proposals for ancillary development on land identified as open space will be supported where it is appropriate in scale, would not detract from the open character of the site or surroundings and it would contribute positively to the setting and quality of the open space. The requirement for a high standard of design and layout is emphasized in all of the above policies and proposals must have regard to mass, bulk, scale and height in relation to their location and surroundings. As this application is seeking only Outline Planning Permission, the matters of the design, scale and the layout are reserved for consideration at a later stage. Nevertheless, in order to establish the acceptability of the principle of the development on the character and appearance of the area, it is imperative to understand maximum and minimum development parameters and the developable area within the red line application site.

6.3.3 In this case the applicant has outlined the maximum parameters of the development to be 17,000m<sup>2</sup> of floorspace and a maximum height of 17 metres AOD. Indicative elevations have been provided demonstrating the potential impact of the development in relation to the existing and emerging context. The building would be no higher than the approved academy building which has an

approved maximum height of 18 metres. The height of the building would also be viewed within the context of the west stand which has a height of 10 metres. It is considered that the proposed building at the indicated maximum height would be acceptable and would respond appropriately to the existing and consented buildings around the subject site.

6.3.4 However, the minimum and maximum parameters for the footprint, length, width of the development has not been specified or the development area within the red line application site boundary been clearly defined. As such, in the absence of this information the Local Planning Authority is unable to determine the acceptability or otherwise of the development on the character and appearance of the area.

6.3.5 In conclusion, due to insufficient information, officers are unable to determine whether the proposed development would have an acceptable impact or otherwise on the character and appearance of the site and area or the surrounding designated open space.

## **6.4 Residential Amenity**

6.4.1 The relevant policies are:

- National Planning Policy Framework (2019)
- London Plan Policy 7.6 B
- The Draft London Plan Policy D3
- Harrow Development Management Policies Local Plan (2013):DM1,

### Residential Amenity of neighbouring Occupiers

6.4.2 The proposed building would be located within the south western area of the wider site. The closest neighbouring properties to the west of the site are located along Aldridge Avenue. These properties are separated from the subject site by London Underground railway tracks which are surrounded by a steep embankment. The rear elevations and rear gardens of the properties are separated by approximately 74 metres and 30 metres respectively to the western application boundary. Although the outlook to these properties would change, any development within this location would be seen within the context of existing and emerging development including the west stand and Academy building. The raised embankment would also reduce the visual impact. Owing to the character of the existing and emerging site, the distances described and the orientation of the properties along Aldridge Avenue, there would be no harm caused to neighbouring amenity in respect of daylight/sunlight or outlook.

6.4.3 The proposed development site is separated from the rear garden boundaries of the closest properties in Camrose Avenue to the south by approximately 145 metres. The land to the south of the subject site already has an extant planning permission for the Academy building (Ref: P/2763/17). Given the residential amenity impacts were found to be acceptable under this application, it is concluded the proposal would also have an acceptable residential amenity impact on these properties.

6.4.4 In summary, it is considered the proposal would have an unacceptable impact on the residential amenities of adjoining residential occupiers.

## **6.5 Traffic and Parking**

6.5.1 The relevant policies are:

- National Planning Policy Framework (2019)
- London Plan Policy 2016: 6.3, 6.10, 6.13
- The Draft London Plan 2019: T1, T2, T4, T6, T6.4
- Mayor's Transport Strategy: Policy 1
- Harrow Core Strategy CS1 R
- Harrow Development Management Policies Local Plan (2013):DM42 and DM 43

6.5.2 The site is bound to the north by Whitechurch Lane and to the south by Camrose Avenue, both of which are borough roads. The Jubilee line bounds the site to the east. The nearest section of the Strategic Road Network (SRN) is A5 Burnt Oak Broadway, located approximately 1.4km to the east of the site. Jubilee line stations' Canons Park Station and Queensbury Station are 190m north, and 850m south, respectively. Bus stops are on Whitechurch Lane and Camrose Avenue, and are served by three strategic routes; service no. 340, 79, 186, and 288.

6.5.3 Intend to publish London Plan Policy T2 requires developments to follow the Healthy Streets Approach, which aims to improve air quality, reduce congestion and make attractive places to live, work and do business by encouraging active travel, public transport use and mode shift from car travel. An Active Travel Zone (ATZ) assessment should be prepared required and submitted for review by TfL and the Council prior to determination.

6.5.4 The main access for pedestrians and vehicles will remain as the existing site on Camrose Avenue, to the south end of the site. Whitechurch Lane offers a secondary pedestrian access to the north. As required by policy T2 of The London Plan (2019) It should be demonstrated how the proposals meets the Healthy Streets indicators including measures to manage traffic movement and avoid conflicts with pedestrians and cyclists. However, the proposal fails to address this policy requirement.

### Car Parking, Traffic Modelling and Trip Generation

6.5.5 As outlined above, the proposed multi storey car park may result in an uplift of 26 spaces. Although as noted above, the applicant has not clarified their intention with the other parking areas on the site which do not fall within the application site boundary. As such, if other parking spaces were retained on the site there could be an uplift of 205 spaces.

6.5.6 The Transport Assessment (TA) submitted to assess the transport implications of the proposals is over 4 years old, and therefore has not been updated to reflect



current national, London or local policy. TFL have raised concerns with the potential impact on the A5 but have been unable to assess the full extent of the impacts as the junction modelling and trip generation analysis is based on 2016 traffic surveys and 2013 trip generation data which does not reflect recent travel patterns.

- 6.5.7 The application has been reviewed by both TFL and the Council Highway's Authority who have both objected to the principle of the development which is not considered to be in line with the Mayor's Transport Strategy or the Policy T.6.4 Hotel and leisure uses parking of the Intend to publish London Plan which states that for PTAL 0-3 locations;

***'schemes should be assessed on a case-by-case basis and provision should be consistent with the Healthy Streets Approach, mode share and active travel targets, and the aim to improve public transport reliability and reduce congestion and traffic levels.'***

- 6.5.8 Moreover, policy T6 (Car Parking) states: "***Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.***"

- 6.5.9 Both TFL and LBH Highways consider that the proposal fails to address active travel to the site or contribute to a reduction in road traffic congestion.

- 6.5.10 The applicant's justification for re-providing all spaces is based on an increase in stadium capacity from 5,176 to 8,500 seats (3,324 additional) however, the number of attendees for Barnet FC games is expected to remain similar to the 2015/2016 season and this is therefore not an acceptable reason for the high quantum of spaces proposed.

- 6.5.11 The existing site trip generation is based on Brentford FC Stadium Travel Plan, 2013 which does not reflect recent travel patterns. The proposed match day modal split suggests the percentage of existing supporters arriving by car will reduce by 10% to around 48%. TFL note that this is not ambitious enough and does not reflect active travel targets in Policy 1 of the Mayor's Transport Strategy and Intend to publish London Plan Policy T6.

- 6.5.12 As noted by LBH Highways "*In order to justify a deviation from the policies, it would be necessary for the applicant to demonstrate a genuine need but that has not been done. The increased stadium capacity does not automatically result in an uplift in car journeys furthermore, actual attendance increases are not expected at this stage or any time soon. If attendance does increase, it would be more appropriate to have measures in place from the outset that encourage sustainable travel rather than attempt to facilitate car travel by increasing car parking. Good travel habits need to be established at an early stage. We can consider the examples set by other London venues such as the Emirates Stadium (Arsenal FC) (ptal 4-6b) and Tottenham Hotspur FC (ptal 3-4) – both have been redeveloped and are marketed as car free venues. Both attract much higher attendance figures and whilst they do have better access to public*

*transport this does serve to demonstrate that a similar venue can operate successfully without large amounts of car parking.”*

6.5.13 In conclusion, in officers view, to allow this proposal to proceed would be detrimental to the Council in terms of setting an unacceptable precedent of policy non-compliance with no supporting justification. Officer's consider that proposals for car parking are likely to add pressure (or will not improve it) to the surrounding Highway network in the form of congestion in both traffic and parking terms and there are no measures included that would seek to reduce the effects of car travel which is contrary to the aims and objectives of the above stated policies.

## **6.6 Biodiversity and Air Quality**

6.6.1 The relevant policies are:

- National Planning Policy Framework (2019)
- London Plan Policy 2016: 7.19, 7.14
- The Draft London Plan 2019: G6
- Harrow Core Strategy CS1 E
- Harrow Development Management Policies Local Plan (2013): DM1, DM12, DM20, DM 21, DM 48
- Circular 06/05: biodiversity and geological conservation)

### Biodiversity

6.6.2 The application is accompanied by a Preliminary Ecological Assessment (PEA) that was prepared more than two years ago. Having regard to this as well as the proximity of the adjoining Site of Importance for Nature Conservation and the nature of the proposal (multi-storey car parking), without an updated PEA, in officer's view it is not possible for the Council to demonstrate that it has adequately exercised its duty under Section 40 of the Natural Environment and Rural Communities Act 2006 to have regard to the purpose of conserving biodiversity (including biodiversity assets beyond the site and its immediate surrounds). Additionally it is not possible to accurately assess if the principle of the development and whether its location is acceptable having regard to DM48 (Enhancing Outdoor Sport Facilities) which refers to impact upon biodiversity assets within or surrounding the site, as well as the biodiversity specific Local Plan policies, DM20 and DM 21.

6.6.3 The applicant's argument that an ecological assessment is not required due to the proposal's location on an existing hard standing car park fails to recognise the potential impact of the proposal on the adjoining SINC and any potential protected species.

6.6.4 Furthermore, the application gives no consideration as to how the site's biodiversity, landscaping and climate mitigation value could be enhanced.

6.6.5 Government guidance (Circular 06/05: biodiversity and geological conservation) is clear in relation to the use of conditions relating to biodiversity matters stating

*“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.” The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances”. There are not considered to be any exceptional circumstances in this case that would warrant the use of a planning condition.*

- 6.6.6 In conclusion, in the absence of an up to date ecological survey, officers cannot be certain whether the proposed development may have adverse implications for the biodiversity of the SINC, including, if present any protected species, and as such would cause unacceptable harm to biodiversity interests, contrary to the above mentioned policies.

### Air Quality

- 6.6.7 As outlined in the London Plan and Draft London Plan – Intend to Publish 2019 (Policy 7.14 and SI 1), all development proposals should minimise increased exposure to existing poor air quality and take steps to minimise the impacts through design solutions and promote greater use of sustainable transport modes through travel plans. As a minimum development proposal should be air quality neutral.
- 6.6.8 The whole of the Borough has been designated as an Air Quality Management Area (AQMA), due to exceedances of the annual mean objective levels for nitrogen oxide (NO<sub>2</sub>) and particulates (PM<sub>10</sub>). The proposed development would result in an increase in vehicular traffic which would contribute to a deterioration in air quality. The application is not accompanied by an Air Quality Assessment demonstrating that the proposed development would be air quality neutral. As discussed elsewhere, the submitted travel plan is out of date and the sustainable travel mode targets are not considered ambitious enough in respect of current policy requirements. Although, the increase in parking may not be deemed significant, in officer opinion, the failure to demonstrate that the development would be air quality neutral undermines the Council position on other development proposals which have the potential to result in detrimental impacts on air quality without demonstrating any mitigation. The proposal is therefore considered to be unacceptable in this regard.

## **6.7 Drainage and Flood Risk**

- 6.7.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan 2016: 5.12, 5.13
- The Draft London Plan 2019: SI 12 and SI13
- Harrow Core Strategy 2012: CS1U
- Harrow Development Management Policies Local Plan (2013):DM9, DM 10

- 6.7.2 Areas of the site wider site are located across all three flood zones. There are areas to the north adjacent to the Edgware Brook which are identified within fluvial flood zone 2 & 3 according to Environment Agency flood maps and also within surface water flood zone 3a & 3b according to LBH surface water flood maps. The site is at a highest risk of flooding.
- 6.7.3 The subject site itself lies within flood zone 1 which has a low probability of flooding and the proposed type of development in this area of the site is appropriate for its intended use.
- 6.7.4 The application is accompanied by an out of date Flood Risk Assessment undertaken in June 2016 which consider the impacts of the Multi storey car park in a different area of the site to the south east which is not relevant to its current proposed siting on the existing surface car park to the south west.
- 6.7.5 As noted in the Flood Risk Assessment area of the existing site are served by existing drainage infrastructure, approved by the Council and Environment Agency as part of earlier phases of the development. The application has been referred to the Council's Drainage Authority who have advised that the subject site is served by an existing drainage required as part of a previous planning consent which intercepts surface water from the site which has not been taken into consideration as part of this application. The Flood Risk Assessment fails to demonstrate the existing surface water storage volume on the site is maintained and that there is no obstruction to surface water flows across the site. As such, in the absence of this information, it is considered that the proposed development is at risk of surface water flooding and acceptable flood mitigation for potential flood risk within the site and elsewhere and for its users has not been demonstrated.
- 6.7.6 In conclusion, the proposal, by reason of an unsatisfactory Flood Risk Assessment, fails to demonstrate that the proposed development would result in a net reduction in flood risk, be resistant and resilient to flooding, would not exacerbate the risk of flooding within the site or increase the risk and consequences of flooding elsewhere or provide a dry means of escape for the future users, to the detriment of the safety of future users of the development, contrary to the above policies.

## **7.0 CONCLUSION AND REASONS FOR REFUSAL**

- 7.1 The application is accompanied by out of date technical reports and as such officers are unable to make an appropriate assessment on the main material planning consideration of the application. The proposed development, fails to comply with the development plan for Harrow in relation to matters of traffic and parking, biodiversity, flood risk, air quality, access to community sport and impact on the character and appearance of the area including the surrounding designated open space and is therefore recommended for refusal

## **INFORMATIVES:**

### 1. Policies

The following policies are relevant to this decision:

#### **National Planning Policy:**

National Planning Policy Framework (2019)

#### **The London Plan (2016):**

- 3.1 Ensuring equal life chances for all
- 3.2 Improving health and addressing health inequalities
- 3.5 Quality and Design of Housing Developments
- 3.8 Housing Choice
- 3.16 Protection and Enhancement of Social Infrastructure
- 5.12 Flood Risk Management
- 5.13 Sustainable Drainage
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.10 Walking
- 6.11 Smoothing traffic flow and tackling congestion
- 6.13 Parking
- 7.1 Building London's neighbourhoods and communities
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.6 Architecture
- 7.14 Air Quality
- 7.18 Protecting Open Space and addressing deficiency
- 7.19 Biodiversity and access to nature
- 7.21 Trees and Woodlands

#### **The Draft London Plan – Intend to Publish (2019):**

- Policy D1 London's form and characteristics
- Policy D2 Delivering good design
- Policy D3 Inclusive design
- Policy S1 Developing London's social infrastructure
- Policy S2 Health and social care facilities
- Policy S4 Play and Informal Recreation
- Policy S5 Sports and Recreation Facilities
- Policy G4 Open Space
- Policy G6 Biodiversity and access to nature
- Policy SI1 Improving air quality
- Policy SI12 Flood risk management
- Policy SI13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling

Policy T6 Car parking  
Policy T6.4 Hotel and leisure uses parking

**Harrow Core Strategy (2012)**

CS1: Overarching Principles

**Harrow Development Management Policies Local Plan (2013):**

Policy DM 1 Achieving a High Standard of Development  
Policy DM 9 Managing Flood Risk  
Policy DM 10 On Site Water Management and Surface Water Attenuation  
Policy DM 12 Sustainable Design and Layout  
Policy DM 18 Protection of Open Space  
Policy DM 20 Protection of Biodiversity and Access to Nature  
Policy DM 21 Enhancement of Biodiversity and Access to Nature  
Policy DM 22 Trees and Landscaping  
Policy DM 42 Parking Standards  
Policy DM 43 Transport Assessments and Travel Plans  
Policy DM44 Servicing  
Policy DM 46 New Community Sport and Educational Facilities  
Policy 50 Planning Obligations

**Other Relevant Guidance:**

Site Allocations DPD (2013)

2. INFORMATIVE: Mayoral Community Infrastructure Levy

Please be advised that approval of this application, (by PINS if allowed on Appeal following the Refusal by Harrow Council), attracts a liability payment of £346815 of Community Infrastructure Levy. This charge has been levied under Greater London Authority CIL charging schedule and s211 of the Planning Act 2008. Harrow Council as CIL collecting authority on commencement of development will be collecting the Mayoral Community Infrastructure Levy (CIL). Your proposal is subject to a CIL Liability Notice indicating a levy of £1, 020, 000 for the application, based on the levy rate for Harrow of £60/sqm and the stated floor space of 17,000sqm. You are advised to visit the planning portal website where you can download the appropriate document templates.

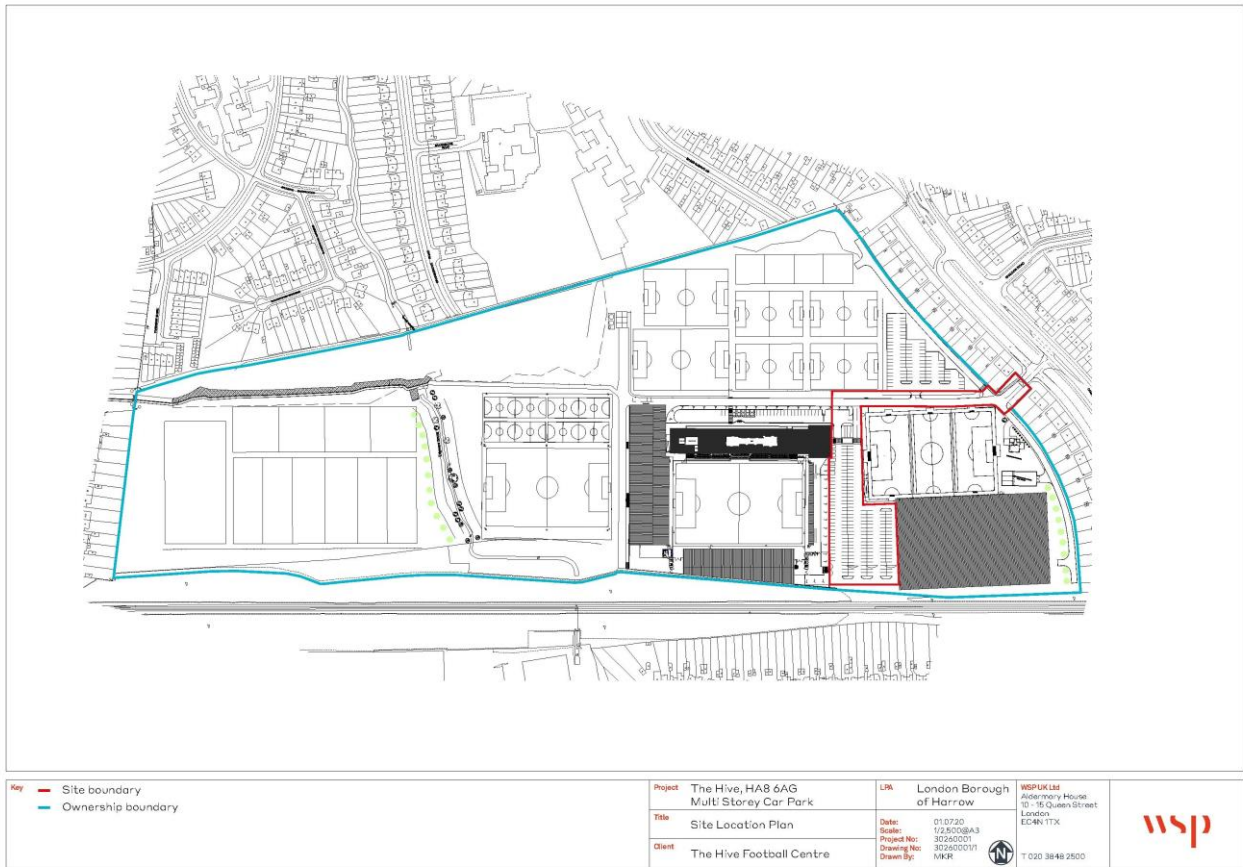
<http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil>

**CHECKED**

Interim Chief Planning Officer	Orla Murphy pp Beverley Kuchar
Corporate Director	Hugh Peart 9/7/2020

**APPENDI**

## X 2: SITE PLAN



**APPENDIX 3: SITE PHOTOS**



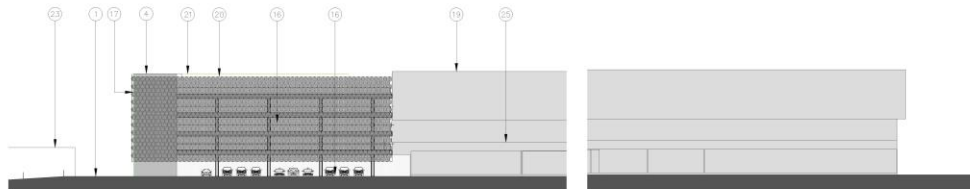


# APPENDIX 4: PLANS AND ELEVATIONS

## Indicative Proposed Site Plan/ Ground Floor Plan



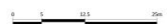
## Indicative Proposed West Elevation



01 West Elevation  
Scale: 1:500 @ A3

- Notes
1. Pedestrian zone around stadium
  2. Main stair core to access the upper levels
  3. Lift access to upper levels
  4. Escape core from upper floors
  5. Motorcycle parking
  6. Parking security office and maintenance
  7. Public staff wc
  8. Enlarged parking bays (3.2 x 6 m)
  9. Accessible parking bays with 1.2 m clear access
  10. Main entrance for indoor academy
  11. Indoor academy pitch
  12. Indoor academy changing rooms
  13. Viewing gallery for indoor academy
  14. Academy pitch below
  15. Access and escape doors to/from car park
  16. Perforated metal cladding to allow natural ventilation and minimise light escaping. Predominantly solid
  17. As per 16. Predominantly solid to West and becoming more open to East
  18. As per 16. Predominantly open
  19. Roof of previously approved academy
  20. Photovoltaic panelled canopy over parking bays to match height of lift over/under stair core roof
  21. PFC cladding to extended height parapet/balustrade
  22. North stand in background
  23. Rear elevation of South stand
  24. Side elevation of East stand

Key:  
 --- Boundary Line  
 --- Area of Application



**For Planning**

Rev.	Description	By	Date
P1	For Planning	CB	18.03.19

Client  
**Football First**

Project  
**The Hive - Car Park & Academy**

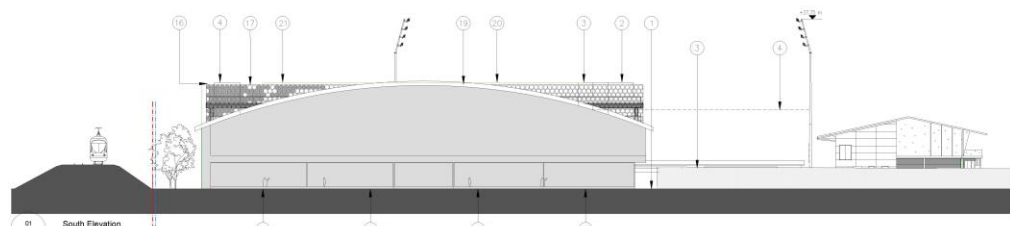
Title  
**Proposed West Elevation**

Drawn By	Rev.
<b>HIVE-1174-W</b>	<b>P1</b>
Project No.	Scale
1:200 @ A1	1:200 @ A3
Drawn	Checked
CB	CB
Date	Date
18.03.19	18.03.19

Do not scale from this drawing. All dimensions should be checked and confirmed on site before the commencement of work. All dimensions shall be reported. Submissions must verify all dimensions on site before making a final drawing or commencing construction. This drawing is referred to as: **012B**

UNIT 5, River House  
 Riverside Close, London, N6C7 7JN  
 T: +44 (0)20 7460 1200  
 E: info@myconstruction.co.uk

## Indication Proposed South Elevation



01 South Elevation  
Scale: 1:500 @ A3

- Notes
1. Pedestrian zone around stadium
  2. Main stair core to access the upper levels
  3. Lift access to upper levels
  4. Escape core from upper floors
  5. Motorcycle parking
  6. Parking security office and maintenance
  7. Public staff wc
  8. Enlarged parking bays (3.2 x 6 m)
  9. Accessible parking bays with 1.2 m clear access
  10. Main entrance for indoor academy
  11. Indoor academy pitch
  12. Indoor academy changing rooms
  13. Viewing gallery for indoor academy
  14. Academy pitch below
  15. Access and escape doors to/from car park
  16. Perforated metal cladding to allow natural ventilation and minimise light escaping. Predominantly solid
  17. As per 16. Predominantly solid to West and becoming more open to East
  18. As per 16. Predominantly open
  19. Roof of previously approved academy
  20. Photovoltaic panelled canopy over parking bays to match height of lift over/under stair core roof
  21. PFC cladding to extended height parapet/balustrade
  22. North stand in background
  23. Rear elevation of South stand
  24. Side elevation of East stand

Key:  
 --- Boundary Line  
 --- Area of Application



**For Planning**

Rev.	Description	By	Date
P1	For Planning	CB	18.03.19

Client  
**Football First**

Project  
**The Hive - Car Park & Academy**

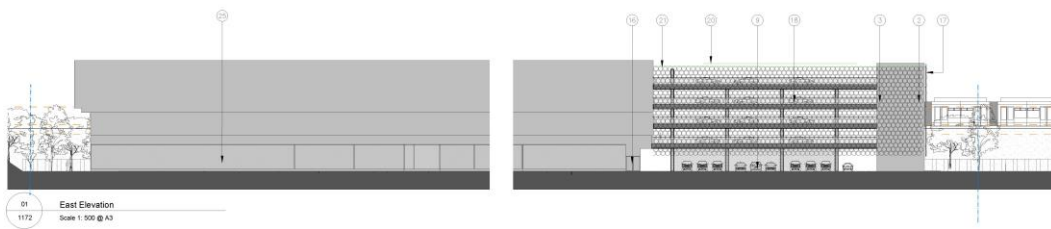
Title  
**Proposed South Elevation**

Drawn By	Rev.
<b>HIVE-1173-S</b>	<b>P1</b>
Project No.	Scale
1:100 @ A1	1:200 @ A3
Drawn	Checked
CB	CB
Date	Date
18.03.19	18.03.19

Do not scale from this drawing. All dimensions should be checked and confirmed on site before the commencement of work. All dimensions shall be reported. Submissions must verify all dimensions on site before making a final drawing or commencing construction. This drawing is referred to as: **012B**

UNIT 5, River House  
 Riverside Close, London, N6C7 7JN  
 T: +44 (0)20 7460 1200  
 E: info@myconstruction.co.uk

# Indicative Proposed East Elevation D



D1  
1172  
East Elevation  
Scale 1:500 @ A3

- Notes:
1. Pedestrian zone around stadium
  2. Main stair core to access the upper levels
  3. Lift access to upper levels
  4. Escape core from upper floors
  5. Motorcycle parking
  6. Parking security office and maintenance
  7. Public staff area
  8. Enlarged parking bays (3.2 x 6 m)
  9. Accessible parking bays with 1.2 m clear access
  10. Main entrance for indoor academy
  11. Indoor academy pitch
  12. Indoor academy changing rooms
  13. Viewing gallery for indoor academy
  14. Academy pitch below
  15. Access and escape doors to/from car park
  16. Perforated metal cladding to allow natural ventilation and minimise light escaping. Predominantly solid
  17. As per 16. Predominantly solid to West and becoming more open to East
  18. As per 16. Predominantly open
  19. Roof of previously approved academy
  20. Photovoltaic solar panel canopy over parking bays to match height of fit over main cone roof
  21. PPC capping to extended height parapet/terrace
  22. North stand in background
  23. Rear elevation of South stand
  24. Side elevation of East stand
  25. Side Elevation of previously approved East elevation
  26. PPC metal facade to ground floor of east elevation parking area

- Key:
- Boundary Line
  - - - Area of Application

0 10 20 30m

**For Planning**

Rev.	Description	By	Date
P1	For Planning	CB	18.03.19

Client  
**Football First**

Project  
**The Hive - Car Park & Academy**

Title  
**Proposed East Elevation**

Drawing No.  
**HVE-1172-E**

Project No.  
**012B**

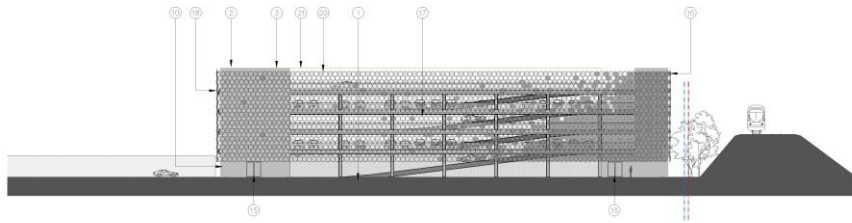
Scale  
1:500 @ A3

Drawn  
Checked  
Date  
01/03/2019

Do not scale from this drawing. All dimensions should be checked and confirmed on site before the commencement of work. All discrepancies must be reported. Submittals must comply with all dimensions and details before making a final drawing or commencing manufacturing. This drawing is subject to copyright ©.

MY  
CONSTRUCTION

# Indicative Proposed North Elevation



01  
1171  
North Elevation  
Scale 1:500 @ A3

- Notes:
1. Pedestrian zone around stadium.
  2. Main stair core to access the upper levels.
  3. Lift access to upper levels.
  4. Escape core from upper floors.
  5. Motorcycle parking.
  6. Parking security office and maintenance.
  7. Public staff wc.
  8. Enlarged parking bays (3.2 x 6 m).
  9. Accessible parking bays with 1.2 m clear access.
  10. Main entrance for indoor academy.
  11. Indoor academy pitch.
  12. Indoor academy changing rooms.
  13. Viewing gallery for indoor academy.
  14. Academy pitch below.
  15. Access and escape doors to/from car park.
  16. Perforated metal cladding to allow natural ventilation and minimise light escaping. Predominantly solid.
  17. As per 16. Predominantly solid to West and becoming more open to East.
  18. As per 16. Predominantly open.
  19. Roof of previously approved academy.
  20. Photovoltaic panelled canopy over parking bays to match height of lift over the steel core roof.
  21. PPC capping to extended height parapet/obstacle.
  22. North stand in background.
  23. Rear elevation of South stand.
  24. Side elevation of East stand.
- Key:
- - - Boundary Line
  - - - Area of application

0 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

For Planning  
01  
1171

Rev. Description No. Date  
P1 For Planning CB 08.03.19

Client  
**Football First**

Project  
**The Hive - Car Park & Academy**

Title  
**Proposed North Elevation**

Drawing No. **HIVE-1171-N** Rev. **P1**

Project No. **012B** Scale **1:500 @ A3** Date **08.03.2019**

Drawn	Checked	Date
CB	CB	08.03.2019

Do not scale from this drawing. All dimensions should be checked and confirmed on site before the commencement of work. All discrepancies must be reported. Subcontractors must verify all dimensions on site before making a shop drawing or commencing manufacturing. This drawing is subject to copyright. ©

**MY** construction  
020 800 8000  
100 Victoria Road, London, W14 7JH  
T +44 (0)20 800 8000  
E info@myconstruction.co.uk

**This page has been left intentionally blank**