

HARROW COUNCIL

SUPPLEMENTAL ADDENDUM

PLANNING COMMITTEE

DATE: 09 December 2020

1/01	<p>Addendum Item 1:</p> <p>Amend the design review obligation (page 27) as follows:</p> <p>An undertaking by the developer to retain the existing architect (or one of equivalent standard) until the development is completed; or, the submission of a Design Code for approval by the Council that details the quality of the external materials of the finished development and other design parameters</p> <p>Addendum Item 2:</p> <p>Proposal description correction - para 2.7 of the report (page 33) as follows:</p> <p>A total of <u>12</u> units would be wheelchair user dwellings, while the remaining units would all be ‘accessible and adaptable dwellings’</p> <p>Addendum Item 3:</p> <p>Consultation responses update - section 4 of the report (pages 33-70).</p> <p>One further consultation response has been received which has raised an objection to the proposal.</p> <p>Summary of Comments:</p> <p><u>Navin Shah AM</u> I refer to the above application and confirm my objection on the following material planning grounds.</p> <p>I welcome the application for the much-needed affordable housing in the borough and in principle site is a suitable location. However, there are aspects of the application which are fundamentally flawed, as explained below, and for those reasons I’m not able to support this application.</p> <p>My major concern is the over-development due to the unacceptably high level of density resulting in unacceptable harm to the Grade II listed Historic Park and Garden which is also a designated Metropolitan Open Land located in the close proximity of the development site.</p>
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Neither I'm opposed to high densities or tall buildings, but they need to be 'appropriate' which in this case they are not. The section on 'Housing Supply and Density' of the committee report refers to Policy 3.4 and table 3.2 (density matrix) of the London Plan (2016). Applying the density matrix, as the committee report concedes, the proposal equates to 544 habitable rooms per hectare as against the range of 150 to 250 defined in the London Plan density matrix. So, the proposed density exceeds by double/triple the provision required/recommended in the matrix of the London Plan (2016).

Further density consideration is the 'intend to publish version' (2019) of the draft London Plan with its enshrined 'design-led approach' (Policy D3) which removes the density matrix and promotes higher density development in well connected locations. Given that the site has PTAL rating of -3 it is in a 'moderate' location. The report claims the proposal to have 'robust justification for the development'. This is not so for the following reasons.

The LBH Design Officer comments in the committee report state 'Front elevations are partially successful with limited rhythm and alignment of façade elements'. LBH Conservation officer in appraising the application states 'The proposal would greatly undermine the character given the height proposed and its proximity to these designated heritage assets...'. S/he further states 'it is only a reduction in height that could alleviate/remove the harm significantly particularly to the building nearest the park, This is recommended'. I accept that the balconies on the north elevation have been removed but that's really a superficial change and does not address the issue of massing, the bulk and the harm.

None of the above in terms of level of the density and quality of design suggest that the scheme delivers anywhere near acceptable level of 'design led approach' to comply with the draft London Plan (2019) requirements. Weighing up the public benefits from the affordable housing against the demonstrable harm of the poorly designed application scheme and based on the evidence submitted above I urge the planning committee to refuse the application (on the grounds of excessive density resulting in overdevelopment, bulk and severe detriment to the Grade II listed Historic Park).

Addendum Item 4:

Planning Obligations and Infrastructure Updates

Affordable Housing – Para 6.10.6 (page 124) amended to include:

Priority Band 1 would be for those whose primary place of residence or work at the date of purchasing the relevant London Shared Ownership Unit falls within the London Borough of Harrow

Transport and Highways – Para 6.10.7 (page 124) contribution amended as follows:

The financial contribution shall be capped at £50,000

Addendum Item 5:

Condition amendments

Amend Condition 3 (page 130) as follows:

Construction Logistics Plan

No development shall take place until a construction logistics plan has been submitted to and agreed in writing by the Local Planning Authority. The plan shall detail the arrangements for:

- a) the parking of vehicles of site operatives and visitors;
- b) loading and unloading of plant and materials;
- c) storage of plant and materials used in construction the development;
- d) the erection and maintenance of security hoardings including decorative displays and facilities for public viewing;
- e) wheel washing facilities;
- f) a scheme for recycling/disposing of waste resulting from demolition and construction works;
- g) measures for the control and reduction of dust; and
- h) measures for the control and reduction of noise and vibration.

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

REASON: To ensure that measures are put in place to manage and reduce noise and vibration impacts during demolition and construction and to safeguard the amenity of neighbouring occupiers

Amend Condition 8 (page 132) as follows:

Permeable Paving and Drainage Strategy

- a) Notwithstanding the approved details and prior to the commencement of development, full details of the permeable paving shall be submitted to and approved in writing by the Local Planning Authority. Details thereby approved shall be retained thereafter.
- b) Details relating to the long-term maintenance and management of the on-site drainage shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of drainage works.

REASON: To ensure that the development has adequate drainage facilities, to reduce and mitigate the effects of flood risk and would not impact the character and appearance of the development

Amend Condition 11 (page 133) as follows:

Biodiversity Enhancement and Management Plan (BEMP)

The development hereby approved shall not commence until a Biodiversity Enhancement and Management Plan (BEMP) has been submitted to and approved in writing by the local planning authority. The BEMP shall be required to provide full details of:

- provision of biodiverse, blue-green roofs of varied topography, equipped with a mix of shelter elements to suit a broad spectrum of invertebrate groups; full build-up details and proposed plant species
- installation of an appropriate boundary to provide a better connection between the development site and adjoining SINC at both west and north boundaries taking into consideration TfL operational requirements on the western boundary.
- treatment of the edge of the site so that hard surfaces end no less than 300-500 mm or more from the edge of the SINC
- number, type and placement of wildlife shelters for bat and bird (including e.g. house sparrow, tits, robins, swift, starling, kestrel) species and a range of invertebrate species wildlife to be incorporated within the fabric of the buildings and other structures, including solid and green walls
- biodiversity value of ground level soft landscaping elements
- lighting and glazing strategy intended to minimise the impacts of both internal and external illumination on nocturnal and crepuscular wildlife
- programme of works to be undertaken during the construction and establishment phases
- the first five years of management following establishment and subsequent plan updates
- arrangements for management plan implementation, oversight, update and monitoring

The development shall be carried out in accordance with the details agreed and retained thereafter

REASON: To enhance green infrastructure and to provide gain for biodiversity

Amend Condition 15 (page 134) as follows:

Landscaping Details

Notwithstanding the details that have been submitted, the development hereby approved shall not progress beyond damp proof course level until a scheme for detailed hard and soft landscaping of the development has been submitted to and approved in writing by the Local Planning Authority. To include

- a) details of the planting, hard surfacing materials, and including the external seating, street furniture, pergolas, trellis, climbing plant supports, tree pits including all underground cellular systems, drainage, growing medium, tree planting and support, rain gardens, SUDs measures..

Soft landscaping works shall include: planting plans (at a scale not less than 1:100), written specification of planting and cultivation works to be undertaken and schedules of plants, noting species, plant sizes, plant container sizes (all at time of planting) and proposed numbers / densities and an implementation programme. Planting which may provide benefits in terms of improving air quality are encouraged.

The hard surfacing details shall include samples to show the texture and colour of the materials to be used and information about their sourcing/manufacturer. The hard and soft landscaping details shall demonstrate how they would contribute to privacy between the communal gardens and the adjacent flats.

- b) Details of all furniture, specification for the proposed supports and fixings for plants, landscape structures and pergolas and climbing plant frames, including proposed material and source / manufacturer and detailed drawings of such; for all communal areas and bespoke furniture.
- c) Full scale metric cross sections and elevations for all communal open amenity spaces (at a scale of not less than 1:100) including the proposed details for level changes.
- d) details of boundary treatment

REASON: To ensure that the development achieves a high standard of design, layout and amenity and makes provision for hard and soft landscaping which contributes to the creation of a high quality, accessible, safe and attractive public realm

Amend Condition 23 (page 137) as follows:

Lighting Strategy

Prior to installation of lighting, details of the lighting of all public realm and all exterior communal areas (including buildings) within the site has first been submitted to and agreed in writing by the Local Planning Authority. The details shall include details of the intensity of light emissions (including the surface area to be illuminated), light spillage, specification and detailed drawings of the proposed lighting columns and fittings and any measures for mitigating the effects of light pollution. The exterior lighting would need to take account of any biodiversity recommendations or requirements, such as bat friendly lighting. The units shall not be occupied until the lighting has been provided on site in accordance with the approved plans and the details so agreed and shall be retained as such thereafter.

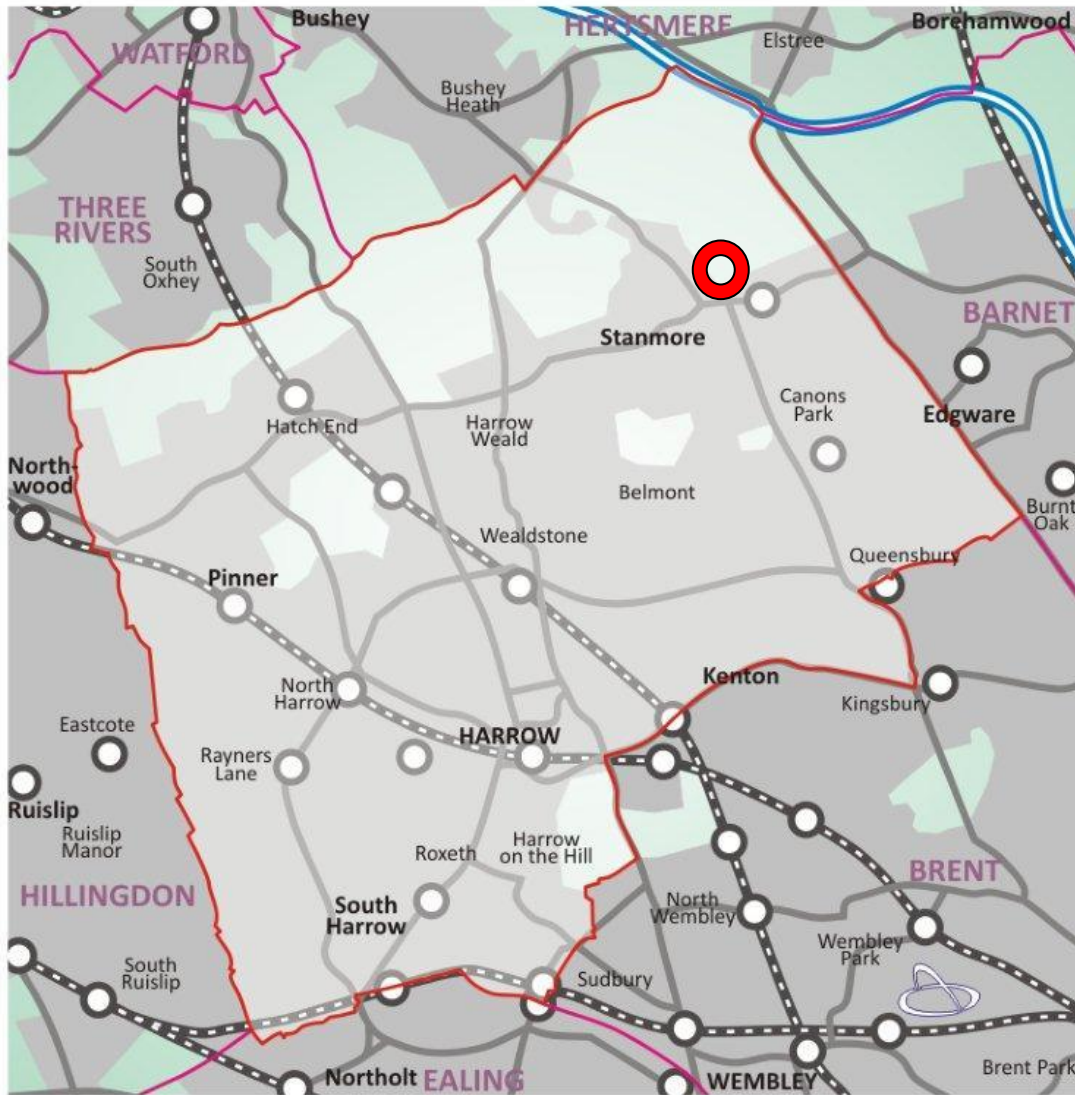
REASON: To ensure that the development incorporates lighting that contributes to Secured by Design principles, achieves a high standard of residential quality in accordance and protects biodiversity.

2/01

Addendum Item 1:

Replace the site plan (page 153) with the following:

 = application site



2/02

Addendum Item 1:

Biodiversity Officer Comments:

Comments from the Biodiversity Officer are as follows:

- The development site is sufficiently removed from designated wildlife sites that the presented proposals would have no direct impact. Biodiversity considerations are therefore more about what is on site and the site's role and value within the local ecological network.
- Should there be no over-riding reasons for refusal in relation to other issues, the scheme could be considered to represent sustainable development, subject to how works are conducted, with regard to the NPPF and to meet local planning policy requirements relating to biodiversity, provided the indicated conditions are to be implemented in full.

Addendum Item 2:

Subsequent Amendment to Conditions:

In place of Condition 15 substitute the following wording:

Biodiversity 1

15. No development, including demolition, hereby permitted shall commence until a **Mitigation and Enhancement Management Plan** detailing the measures to be undertaken to provide appropriate mitigation and gain for biodiversity, in respect of the impacts of the scheme's construction and operation, within and around the site, to include the provision of:

- (a) Trees, and new hedge planting along the garden boundaries, other vegetation and any necessary protection for retained trees;
- (b) Full details of the type, numbers and locations for bat, bird and other wildlife shelters, with a requirement to include provision for house sparrow and other birds. All bat and bird boxes should be incorporated within the fabric of the new buildings, or where building orientation precludes this within existing trees.
- (c) A lighting strategy that will minimize potential disturbance to the behavior of nocturnal species including bats and permanently prevent direct illumination of the provided bat shelters.
- (d) A detailed plan for:
 - a. the phasing of the above works in relation to the construction schedules and the establishment phase for the soft landscaping;
 - b. the maintenance and management of the provided wildlife features for a period of at least 5 years following on from the establishment of the soft landscaping;
 - c. the inclusion of at least one 13 x 13 cm 'hedgehog hole' at the base of each boundary in the rear garden.

The MMEP may be incorporated within a more general landscape plan

The applicant will need to demonstrate that these will adequately protect wildlife and provide proportionate and appropriate enhancement for biodiversity.

REASON: To protect wildlife in accordance with local plan policy DM 20 and to ensure that development provides gain for biodiversity in accordance with local plan policy DM21 and the National Planning Policy Framework.

Addition of the following new condition:

20. A Construction Environment Management Plan that, in addition to the other matters which it will be expected to address in accordance with industry best practice, will set out clearly and in adequate detail:

- (a) how potential impacts on biodiversity, including protected and priority species will be avoided or, where this is not entirely possible, minimized
- (b) the steps to be taken to ensure such measures will be fully implemented by the responsible contractors.

This should have particular regard to breeding birds, reptiles and amphibians, the avoidance of wildlife becoming trapped in earthworks, the impacts of any construction lighting and the handling of the Japanese knotweed. The CEMP shall be submitted prior to any demolition, and works shall not commence until approval has been issued in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved details.

REASON: To protect wildlife in accordance with local plan policy DM 20 and to ensure that development provides gain for biodiversity in accordance with local plan policy DM21 and the National Planning Policy Framework.

Addition of the following condition:

21. The development of any building including demolition hereby permitted shall not be commenced until the boundary of the site is enclosed by a close boarded or other security fence to a minimum height of 2 metres. Such fencing shall remain until works and clearance have been completed, and the development is ready for occupation.

REASON: In the interests of amenity and highway safety.

AGENDA ITEM 10 – REPRESENTATIONS ON PLANNING APPLICATIONS

Agenda Item	Application Address	Speakers
1/01	Canons Park Station Car Park (P/0858/20)	Shirley Sackwild (Objector) Steve Skuse (Agent for Applicant) Cllr Ameet Jogia (Back Bench) Cllr Amir Moshenson (Back Bench) Cllr James Lee (Back Bench)
2/01	Land South of Anmer Lodge (P/3109/20)	Theo Demolder (Objector) Lotte Hirst (Agent for Applicant)
2/03	3 Lyncroft Avenue (P/2173/20)	Robert Bruce (Objector) Sammy Chan (Agent for Applicant) Cllr Richard Almond (Back Bench)
3/01	Prince Edward Playing Fields (P/1564/20)	Sean McGrath (Agent for Applicant)