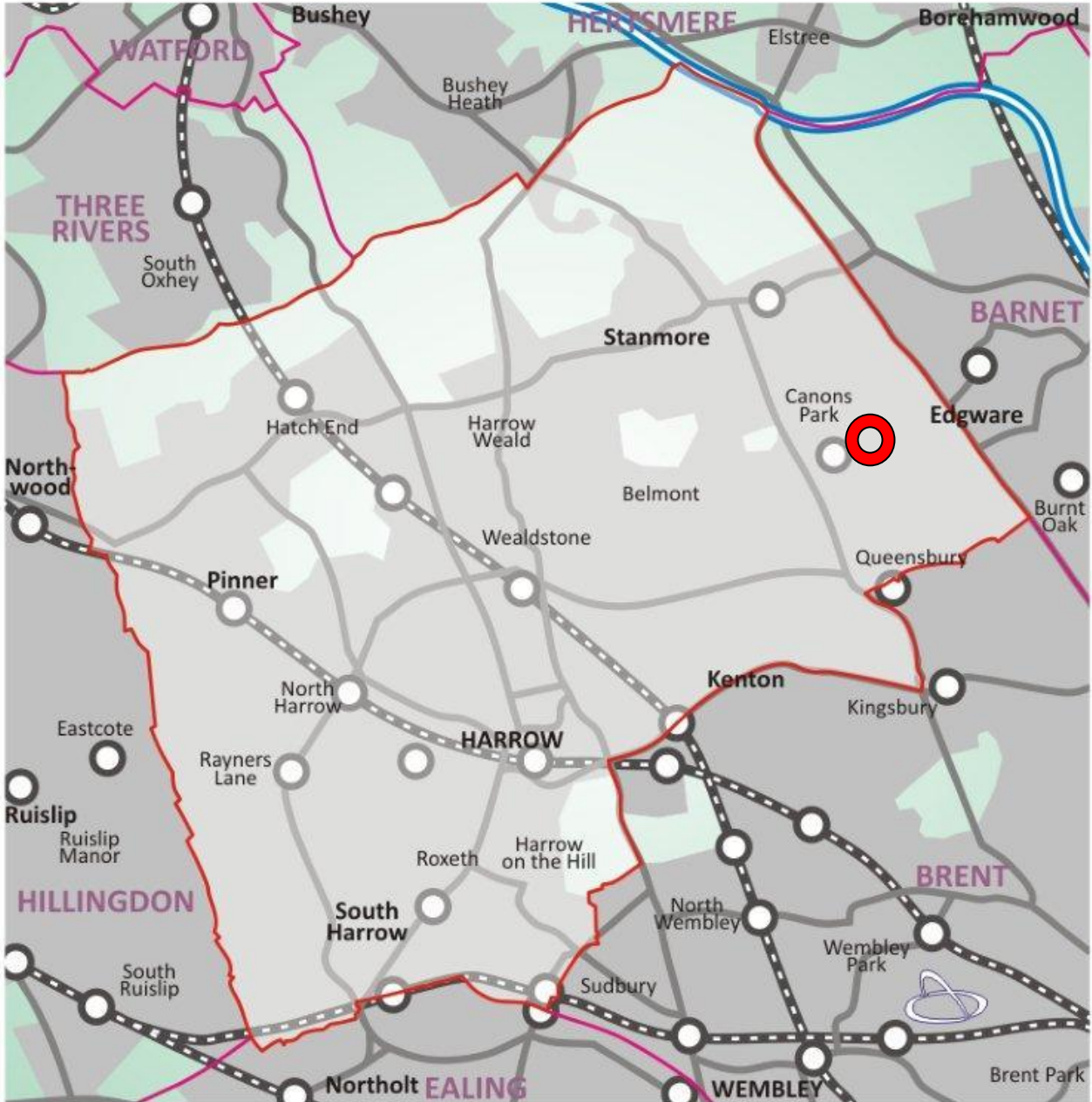
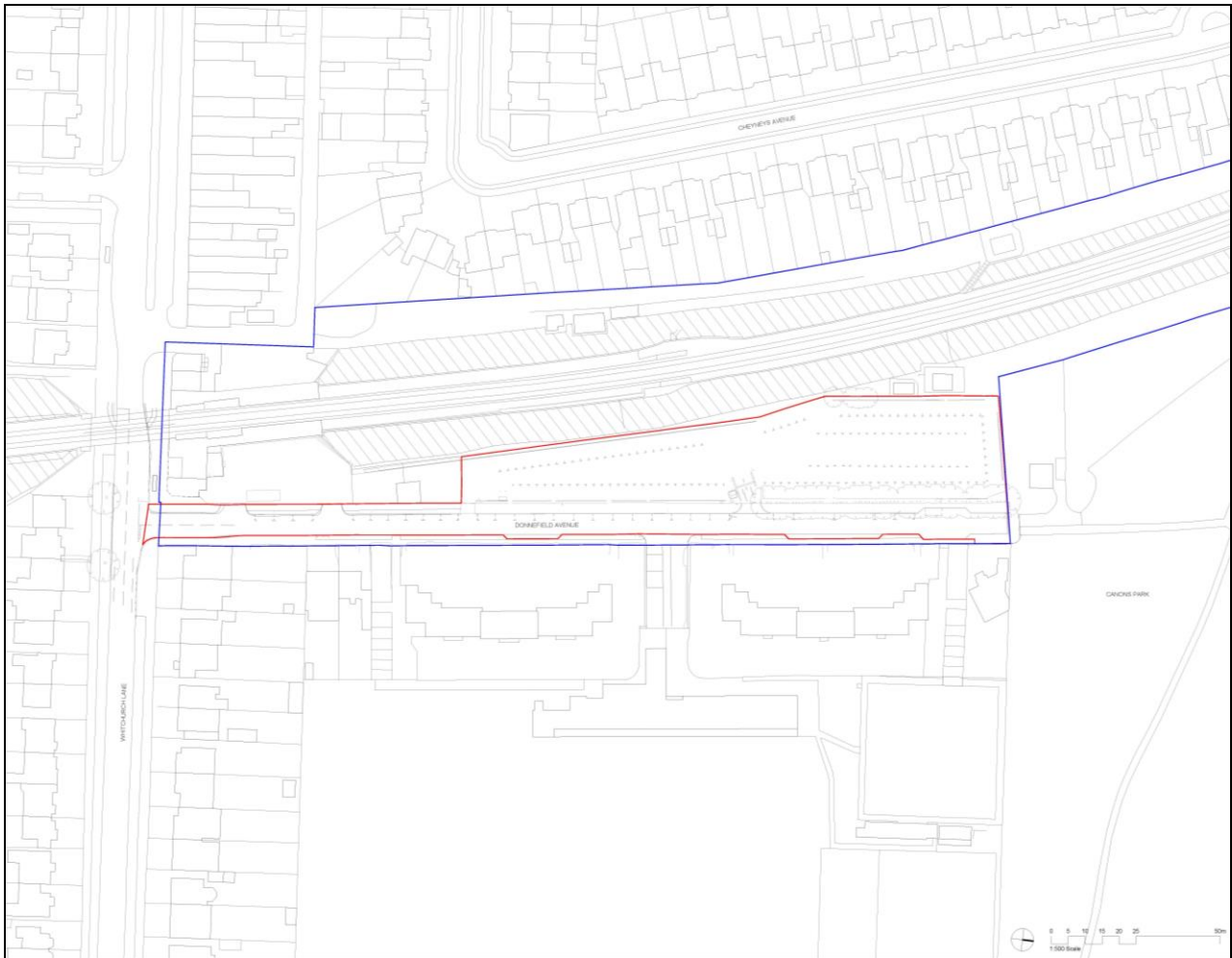


 = application site



<b>Canons Park Station Car Park, Donnefield Avenue</b>	<b>P/0858/20</b>
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# CANONS PARK STATION CAR PARK, DONNEFIELD AVENUE



**LONDON BOROUGH OF HARROW  
PLANNING COMMITTEE**

**20<sup>th</sup> January 2021**

**APPLICATION NUMBER:** P/0858/20  
**VALID DATE:** 04/03/2020  
**LOCATION:** CANONS PARK STATION CAR PARK,  
DONNEFIELD AVENUE  
**WARD:** CANONS  
**POSTCODE:** HA8 6RL  
**APPLICANT:** CATALYST HOUSING LIMITED AND TRANSPORT FOR  
LONDON (TfL)  
**AGENT:** CBRE LTD  
**CASE OFFICER:** NABEEL KASMANI  
**EXTENDED EXPIRY DATE:** 31<sup>st</sup> MARCH 2021

**PROPOSAL**

Redevelopment of existing car park to provide new residential accommodation (Use Class C3) and Sui Generis unit at ground floor and public car park along with associated works

**RECOMMENDATION A**

The Planning Committee is asked to:

- 1) agree the reasons for approval as set out in this report, and
- 2) Grant planning permission subject to authority being delegated to the Interim Chief Planning Officer in consultation with the Director of Legal and Governance Services for the completion of the Section 106 legal agreement and other enabling development and issue of the planning permission, subject to amendments to the conditions, including the insertion or deletion of condition as deemed fit and appropriate to the development or the amendments to the legal agreement as required. The Section 106 Agreement Heads of Terms would cover the following matters:

**Affordable Housing and Wheelchair Homes**

- The following affordable housing to be provided on site:

Affordable Rent

- 2 x 2 bed, 3 person units (provided as wheelchair adapted units)
- 9 x 2 bed, 4 person units
- 11 x 3 bed, 5 person units

### Shared Ownership

- 48 x 1 bed, 2 person units
  - 44 x 2 bed, 4 person units
  - 4 x 3 bed, 5 person units
- Cascade mechanism to ensure each Shared Ownership Unit shall be marketed for first sale exclusively to Harrow residents for no less than 3 months and an income cap for eligible purchasers

### **Transport and Highways**

- A contribution for further parking surveys to be carried out prior to occupation and post occupation of the 100<sup>th</sup> flat and a commitment to funding the study and implementation of CPZ measures should specific interventions be identified. The financial contribution shall be capped at £50,000.
- The development to be 'resident permit restricted' and the developer to ensure that: (i) all marketing/advertising material makes reference to the fact that; and (ii) all sales and lettings agreements contain a covenant to the effect that; future owners, occupiers and tenants (other than those that are registered disabled) will not be entitled to apply for a residents parking permit or a visitor parking permit.
- A commitment that the developer will investigate to the Council's satisfaction and if appropriate, make reasonable endeavours to implement a car club scheme at the site throughout the life of the development
- A Station Travel Plan to be submitted to the Council prior to commencement of development. The developer to ensure the effective implementation, monitoring and management of the travel plan for the site
- A revised Residential Travel Plan to be submitted to the Council prior to the first occupation of the building. A travel plan bond (to be agreed with the Council) will be required to secure the implementation of all measures specified in the revised Travel Plan. The developer to ensure the effective implementation, monitoring and management of the travel plan for the site
- A financial contribution of £25,000 for improvements to the Jubilee Cycle Network
- The developer to enter into a Section 278 agreement to facilitate alterations to Donnefield Avenue. A £5,000 contribution is required for order-making

### **Children and Young People's Play space**

- A financial contribution (to be agreed with the Council) to fund off-site provision (including enhancements to existing provision where appropriate) of play space and equipment

## **Heritage**

- A financial contribution of £10,000 for the repair of the 18th Century Grade II Listed Memorial Garden Walls within Canons Park

## **Biodiversity Enhancement and Management**

- The developer shall submit a Biodiversity Enhancement and Management Plan (BEMP) and any monetary contributions for offsite works dependent on the impact, mitigation and net gains required as set out in the BEMP.

## **Carbon Offset**

- A financial contribution prior to commencement of the development for the shortfall in on-site carbon reductions required to achieve net zero carbon in line with the GLA rates (to be determined based on a revised energy strategy that reflects a more detailed assessment). Verification of post-completion or final on-site emissions will inform any further offset contribution that may be required.

## **Design Review and Design Code**

- 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

## **Employment and Training**

- A financial contribution to be paid by the developer to fund local employment and training programmes and the submission of a Training and Recruitment Plan
- The developer to use all reasonable endeavours to secure the use of local suppliers and apprentices during the construction of the development.

## **Legal costs, administration and monitoring**

- A financial contribution (to be agreed) to be paid by the developer to the Council to reimburse the Council's legal costs associated with the preparation of the planning obligation and a further to be paid to reimburse the Council's administrative costs associated with monitoring compliance with the obligation terms in accordance with the adopted fees and charges schedule.

## **RECOMMENDATION B**

That if the Section 106 Agreement is not completed by 31 March 2021 or such extended period as may be agreed in writing by the Interim Chief Planning Officer, the section 106 Planning Obligation is not completed, then delegate the decision to the Divisional Director of Planning to REFUSE planning permission for the appropriate reason.

The proposed development, in the absence of a Legal Agreement to provide appropriate improvements, benefits and monitoring that directly relate to the development, would fail to adequately mitigate the impact of the development on the wider area and provide for necessary social, environmental and physical infrastructural improvements arising directly from the development, contrary to the National Planning Policy Framework (2019), Policies 3.6, 3.11, 5.2, 6.3, 6.13 and 8.2 of the London Plan (2016), Policies D4, H4, S4, SI2, T4, T6, T6.1 and DF1 of the Publication London Plan (2020), Policy CS1 of the Harrow Core Strategy (2012) and Policies DM12, DM28, DM42, DM43, DM50, of the Harrow Development Management Policies Local Plan (2013), harrow planning obligations SPD

## **REASON FOR THE RECOMMENDATIONS**

The Canons Park Station Car Park is allocated for residential development with the retention of appropriate station car parking, under Site H17 in the Local Plan. The provision of housing on the site is consistent with the Development Plan's broader objective to meet development needs on previously developed land, and to do so in sustainable locations, without resorting to development on greenfield and garden land.

The proposal would deliver 118 units of housing, all of which would be affordable-tenure. The delivery of 22 family sized London Affordable Rent units would meet the priority need within the Borough, while the 96 Shared Ownership units would provide a genuinely affordable housing option for residents in Harrow. The proposal would therefore contribute to the achievement of local policies, the strategic level need for new (affordable) homes for London and the Government's policy objective of boosting significantly the supply of homes.

The proposal has been conceived through a design-led approach that has sought to optimise development on this accessible, brownfield site. Officers recognise the proposal would introduce a development of contrasting scale and height that would contribute to a change in townscape character. However, as set out in the report, various experts in the design field have considered the scheme and have not raised any fundamental objections to the massing or design. Officers are mindful of this expert advice and consider that the proposed buildings would respond to the challenging constraints of the site and optimise the capacity of the site for development. The proposed development would therefore achieve a high standard of design and layout and would deliver an inclusive, attractive, well-designed and accessible public realm that supports the objectives of lifetime neighbourhoods.

The northern tip of the application site lies within the Canons Park Estate Conservation Area. The application site is also within the setting of Canons Park, a Grade II listed Registered Park and Garden. Officers recognise that while many key features contributing

to the significance of Canons Park and the Conservation Area would remain, including verdant views from key viewpoints and individually listed heritage assets, the proposal would nonetheless have a 'less than substantial' harmful impact on the setting of the heritage assets. As set out in the report, officers consider that the public benefits of the scheme outweigh the harm to the designated heritage assets. The balance as set out in Paragraph 196 of the National Planning Policy Framework therefore weighs in favour of the proposals.

The traffic and transport impacts of the development have been appraised by the applicant and are set out in the submitted Transport Assessment. Council Officers have scrutinised the Assessment and concluded that a reduction in the station car parking, car free approach for the residential component and highway works can be accepted, provided suitable mitigation measures are introduced. A package of mitigation measures have been provided to contribute to the modal shift and sustainable travel alternatives, and would be secured through s106 obligations and planning conditions. While many residents have expressed concern at the loss of station car parking and the resulting impacts on traffic and parking in the locality, Officers are satisfied that the transport impacts of the development would be appropriately mitigated. The proposal would therefore align with the strategic and local transport policies as set out in the development plan.

A range of potential environmental effects have been appraised. The proposal would incorporate measures that would help adapt with and manage the impacts of climate change, the environment and biodiversity. Where parts of the proposal would require further mitigation and enhancements, including those needed to secure optimal living conditions for future occupiers and to safeguard the environment during construction and upon occupation, these would be secured through a range of recommended s106 obligations and conditions of planning permission.

The concerns of residents, amenity associations and neighbouring interests are all acknowledged. The report does identify impacts of the proposed development on the amenity of neighbouring occupiers and the on the setting of the designated heritage assets. However, as set out in the report, Officers consider that the material considerations and benefits in favour of the proposal would outweigh the harm.

To conclude, Officers consider that, subject to s106 obligations and planning conditions, the proposed development is acceptable and worthy of support. In accordance with the National Planning Policy Framework, including its presumption in favour of sustainable development, and subject to the completion of a satisfactory section 106 Planning Obligation, Officers recommended that the application is approved without delay.

## **INFORMATION**

This application is reported to Planning Committee as it is a Major Development and therefore falls outside Schedule 1 of the Scheme of Delegation.

This application was deferred from the committee in December for a members' site visit.

Statutory Return Type:	Largescale Major Dwelling Development
Council Interest:	n/a
Net Additional Floorspace:	10,577m <sup>2</sup>
GLA Community Infrastructure Levy (CIL):	£51,000
Local CIL requirement:	n/a

## **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 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 has been recommended for evidence of certification of Secure by Design Accreditation for the development to be submitted to and approved in writing by the Local Planning Authority before any part of the development is occupied or used.



## **1.0 SITE DESCRIPTION**

- 1.1 The application site currently comprises a 162 space public car park (approximately 0.4ha) located on the western side of Donnefield Avenue. The car park is owned by Transport for London (TfL) and provides commuter car parking for the adjacent Canons Park Underground Station. Also included within the site boundary is the Donnefield Avenue carriageway and the pedestrian footway on the western part of the road.
- 1.2 The application site is adjoined to the south by British Emergency Ambulance Response Service (Bears) Centre and beyond this, Canons Park Underground Station. A steep railway embankment and the Jubilee railway line borders the application site to the west. The land to the south and west of the application site is also owned by TfL.
- 1.3 The eastern side of Donnefield Avenue features two detached buildings which are part 2 and part 3 storeys in height and consist of twenty flats respectively. 1-20 Canons Park Close is located opposite to the southern part of the application site and has extant planning permission for the creation of an additional floor (planning reference P/1277/20). 21-40 Canons Park Close is located opposite the northern part of the application site. Also, on the eastern side of Donnefield Avenue is the access to Arnold House School Playing Fields, Acorn Tennis Club and Lupton Bowls club, which is located between the two flatted blocks. To the north of 21-40 Canons Park is the End House, a residential family dwellinghouse.
- 1.4 The application site adjoins Canons Park to the north. Canons Park is a grade II listed Historic Park and Garden and is also designated as Metropolitan Open Land. The northern edge of the application site also falls within the boundary of the Canons Park Estate Conservation Area. Wyel Lodge, a former police office that has been converted back to a residential family dwellinghouse and is located within Canons Park, adjoins the application site immediately to the north.
- 1.5 The application site is located within Environment Agency Flood Zone 1, with a part of the north-western tip of the site falling within Surface Water Flood Zone 3a. Canons Park and the railway embankment which adjoins the west of the application site are designated as a Site of Importance for Nature Conservation (SINC).
- 1.6 The subject site has been allocated for housing (Site H17) in the Harrow Council Site Allocations Local Plan (2013).
- 1.7 The application site has a public transport accessibility level (PTAL) of 3, and is therefore considered to have a good level of access to public transport.

## **2.0 PROPOSAL**

- 2.1 Full planning permission is sought for the redevelopment of the application site to provide 118 residential units (Use Class C3) across three, 7 storey buildings. The proposal would re-provide 60 commuter car parking spaces in addition to a new TfL Cycle Hub.
- 2.2 Building A would be located towards the southern end of the site. The proposed southern flank elevation would be sited approximately 1.5m away from that respective shared boundary. The building would have a maximum depth of 14.5m and a width of 43m. The TfL Cycle Hub would be provided within the southern part of the ground floor. The rest of the ground floor would comprise the entrance lobby, designated cycle and refuse storage for the proposed flats and rooms with servicing/utility provision functions. A total of 22 residential units would be provided within the upper floors. The proposed sixth floor would be recessed with the front elevation incorporating a 2m set-back, while the southern elevation would incorporate 5.8m set back.
- 2.3 Building B would be located centrally within the site and would have a maximum depth of 19.5m and a width of 42m. A separation distance of 13m would be afforded between the proposed southern elevation and building A. The ground floor would have a reduced depth of 8m and would provide an entrance lobby, refuse and cycle storage and two residential units. Beyond this to the rear of the ground floor would be the replacement station car park within a part undercroft. A total of 48 residential units would be provided within this building. The proposed front elevation of the sixth floor would be set-back by 2.5m.
- 2.4 Building C would be located at the northern part of the application site and is identical to building B in relation to its proportions, layout and provision of undercroft parking at ground floor level. There would be a separation distance of approximately 9m between the southern elevation and building B which serves as the access route into the car park, while the proposed northern flank elevation would be sited 10m away from the shared boundary with Wyel Lodge and Canons Park to the north. Building C would also provide a total of 48 residential
- 2.5 The proposed residential units would comprise of the following mix:
- 48 x 1 bed, 2 person units
  - 2 x 2 bed, 3 person units
  - 53 x 2 bed, 4 person units
  - 15 x 3 bed, 5 person units
- 2.6 With regards to the proposed housing tenure, all the proposed residential units would be affordable. A total of 22 units would be London Affordable Rent (equating to 29%) while 96 units would Shared Ownership Units (equating to 71%).
- 2.7 A total of 12 units would be wheelchair user dwellings, while the remaining units would all be 'accessible and adaptable dwellings'.

- 2.8 The proposal would re-provide 60 public commuter parking spaces for Canons Park Station, including 6 wheelchair accessible spaces. The TfL Cycle Hub would provide 71 cycle parking spaces for commuters and the general public to use.
- 2.9 The proposed residential development would be ‘car-free’ and would therefore provide four blue-badge parking bays on implementation and a further eight spaces passive spaces identified for future use should the demand arise. The proposal also provides 212 cycle parking spaces for the future occupiers.
- 2.10 In relation to landscaping and public realm, a community garden would be provided between Buildings A and B, and a pocket garden between Building C and the northern boundary of the application site. The public realm improvements within Donnefield Avenue are aligned to the TfL Healthy Streets guidance including street furniture and soft landscaping. Additional planting is also proposed to the west of the site adjacent to the railway embankment. Improvements to Donnefield Avenue include; highway and pavements re-surfacing, western pavement widening to provide a 2.3m wide pavement and two new highway widenings will be introduced to the eastern side to allow for vehicular passing points and to be used for deliveries and waste collection.
- 2.11 The following amendments have been made to the proposal during the course of the application:
- Removal of the protruding balcony and the Juliette balconies on the northern elevation of Building C facing Canons Park
  - Omission of the ‘play on the way’ proposed along Donnefield Avenue
  - Removal of the raised-table adjacent to the entrance of Canons Park

### **3.0 RELEVANT PLANNING HISTORY**

<b>Ref no.</b>	<b>Description</b>	<b>Status &amp; date of decision</b>
HAR/14793	Provision of car park	Grant 31/12/1958
LBH/24650	Extension to station car park	Grant 02/02/1984

### **4.0 CONSULTATION**

- 4.1 A total of 2,297 consultation letters were sent to neighbouring properties regarding this application. The letters were sent on Tuesday 9<sup>th</sup> June 2020 and residents were provided with a minimum 6 week period of consultation in which to provide a response.

- 4.2 A total of 10 site notices were placed adjacent to the application site, the main entrances to Canons Park, the Underground Station and the Whitchurch Lane commercial parade on 11<sup>th</sup> June 2020. The application was also advertised in the local press on 11<sup>th</sup> June 2020. The application was advertised as a major development, Impact on Setting of a Conservation Area, Setting of a Listed Park and Garden and a Departure from the Development Plan.
- 4.3 A total of 622 neighbour representations have been received. Of these, 614 have raised an objection to the application and 8 have provided support for the proposal. A summary of the responses received are set out below. All material planning/relevant matters have been addressed within report. Other matters raised are not material planning considerations/not relevant to the proposed development.
- 4.4 Furthermore, a petition comprising 2,522 signatures has been submitted in objection to the proposal. The petition has been submitted on the basis that the: *'bulky over-intensive and overbearing proposal is totally out of character with the surrounding suburban area, goes against / contravenes Local, London and National planning policies and will have a devastating and detrimental effect on the views across the Grade 2 listed registered Canons Park. The loss of 100 commuter parking spaces will have a major effect on the locality especially on local and Wembley event days, problems that will be compounded by the application for development of Stanmore Station Car Park'*

#### Summary of Comments on original consultation

##### Character and Design

Out of character; scale and height unprecedented; overbearing; overdevelopment; blight on the landscape; out of keeping; high density; over-intensive use; out of character with suburban style homes; bulky; obtrusive; precedent for future height of development; dominating; invasive development; green belt area treated liked a London Zone 1; uninspiring building; unappealing design with zero character; people pay high prices and enjoy living here due to suburban feel of the area; undesirable use of land; incongruous to area; high rise buildings taking over place of housing; loosing character of neighbourhood; 4 fold increase in inhabitants within cul-de-sac and not acceptable on density grounds; nearest building of a similar height is at least 2 miles away; Stanmore and canons park being inundated with buildings of flats; building is only a few meters from the pavement producing the effect of a continuous brick cliff; will look like crowded inner city London; over-subscribed with apartment buildings; out of keeping with surrounding 1930s estate; will dwarf other properties; inner city building design in suburban area; intrude on the skyline; prison like; development should fit-in with the local area; design is bland; heaving mass of redbrick with a small set-back from the narrow pavement.

##### Heritage / Canons Park

Eyesore from Canons Park; Canons Park will be congested and not enjoyable for residents; increased footfall at Canons Park would negatively impact environment; loss of views to grade II listed park; few green spaces left; St

Lawrence's Church should not be overlooked; would be visible from most of the park and a more sensitive and respectful solution must be found; excess noise and pollution detrimental to Canons Park; westward view from park will be ruined; development will spoil views; will destroy landscape of Canons Park; too much noise and anti-social behaviour adjacent to historic park; canons park important for mental well-being and health; will completely change character of park and views; keep the park a sacred place for personal enjoyment and renewal; overcrowding; overlooking will detract from enjoyment of park; pedestrian access to park compromised by movement of gate for parking so close to the park; will be an act of vandalism perpetrated on a site of national heritage; loss of historic 18th century landscape; pandemic has taught us we need green spaces and unobstructed views; would be sacrilege if the funding and effort to resurrect the sites historical layout and views is ruined by these 7-storey modern buildings; loss of vistas to two 18th century grade 2 listed buildings as seen from canons park; increased parking on roads in the conservation area; canons park will have its value and beauty reduced by the insensitive development; devastating impact on the heritage of canons park; historic sight lines will be overpowered;

### **Residential Amenity**

#### Neighbouring Occupiers

Loss of daylight and sunlight; noise and disturbances to existing residents; blight outlook; noise and disruption during construction; not enough amenity space; health and safety at risk with pollution and traffic; overlooking and height may impinge on privacy; loss of quality of life; loss of privacy; front facing units with recessed balconies would prejudice the future development potential or no.21-40 Canons Park Close;

#### Future Occupiers

Noise pollution for future occupiers; small flat sizes; poor view from flats facing platform; noise impact of 24 hour service on weekend; overlooked by users of the station; health risk due to beak dust from trains; size of individual units will lead to mental health problems; communal amenity noise pollution will require windows to always be closed; space is insufficient; limited and unrealistic amenity space with pocket gardens;

### **Highways and Transport**

#### Station Car Park

Commuter parking spaces needed; car park used on match days for Wembley and the Hive; cheaper to park at station and use underground than commute from outside London Underground stations; car parking at station already at capacity; commuter car parking essential for commuters; safer to use car park than public transport at night; outer edge of London so commuters should be parking here and commuting into London; already station car park cannot meet demand; parking at station vital to allow juggling work, school and home duties; by reducing car parking at the start of the Jubilee line, commuters will not be able to commute; will force people to drive into London; once lost the parking spaces will never be replaced; station car parking is also in short supply like affordable housing; how will losing 60 parking spaces benefit the 1.68 million

users of Canons Park station every year; no station car park during construction; people bringing children in pushchairs/wheelchairs to Canons Park will not have a space for the car; loss of parking spaces will disproportionately affect vulnerable, disabled and frail; how can people use the station if they cannot park cars; Arnold house school's playing field is opposite and parents park in the car park and road while children come in coaches; acorn tennis club and Lupton bowling club opposite and not everyone lives locally so rely on local parking;

#### Public/Sustainable Transport

Will add to the capacity on trains; public transport is still inadequate so cannot compensate for lost car parking; roads not safe for cycling; commuters in business attire cannot cycle; difficult for anyone who doesn't have means except a car to access station; consider elderly and disabled who do not have an option for public transport to station; buses already overcrowded; women put at more risk during night time without nearby parking; dangerous overcrowding at tube station; public transport will become more crowded; more parking would encourage more use of the station; cycle tracks should be introduced and segregated from pedestrians; should include step-free access at the station; is an overflow car park to Wembley stadium on event days; cycling to station may prove unsuitable; jubilee line has more connections to other trainlines; people cannot afford to take car into London with increased congestion charge; increased cycling or walking does not take into account demographics of area; not safe to walk through the park at night to get to station; relying on people to walk or cycle is unreliable when the weather is inclement; essential that people can get into London quickly; pedestrians at risk by swarms of cyclists;

#### Traffic and Parking

Area will be overcrowded with vehicles; more congestion in area; more pressure for parking on side streets; will cause too much traffic; ambulance crew from BEARS already park within side roads as there is no other place to park; existing residents forced out due to congestion and parking constraints; area is over-run with cars and living here is a nightmare; battleground for parking; loss of parking permits for local residents; need more parking; Canons Park Estate side roads ruined by parking; reducing spaces will not reduce parking needs; intensive use of Donnefield Avenue which is a small and narrow road; increased volume of traffic; no traffic calming measures established or planned; majority of existing residents have two cars; access to driveways blocked due to existing parking issues; increased traffic will lead to road traffic accidents and delays; shortage of parking for the tennis club; Whitchurch lane already gridlocked; severe tail backs on Whitchurch lane; surrounding roads will see an increase of illegal parking; no provision for increased traffic on match days; nowhere else for commuters to park and would clog surrounding streets

#### Car Free Proposal

how will the car free use be controlled; residents would still use cars; cannot guarantee buyers wont have cars; no way to enforce car free; to think people will not have cars is naive; lack of parking spaces for visitors of the future occupiers; schemes to reduce car parking in the area have not worked;

### Other

Would be better for a multi-storey car park on the site; no offer for step-fee access to station; safety of children accessing the park; access to schools and recreation grounds will become dangerous for pedestrians; speeding drivers; increased likelihood of accidents; vehicle and delivery van location not provided; road is narrow leaving little space for traffic congestion; visibility when turning and access for emergency vehicles already challenging; underground parking could be provided; pressure on road space for deliveries will be intolerable; more on street parking a hazard for emergency vehicles; junction is an accident hotspot; no one can be sure about the long term consequences for the use of private transport as a result of Covid-19; many large delivery vans parked in the local area at night so would be better for these to be allowed to park in the station car park at night;

### **Local Infrastructure and Services**

health, shopping facilities, transport, schooling are strained; amenities and shops not designed to support an influx of families; ability for social infrastructure to support such a large development should be considered; pressure on local services around; lack of local infrastructure and services; no consideration on impact of local services (schools, doctors and amenities); local services will not be able to accommodate increase in population; overwhelmed; increase pressure on public services; water and drainage capacity is inappropriate for the development; further pressure on Council to provide street cleaning and landscape maintenance; schools oversubscribed; disadvantage long-established businesses at canons park station due to higher operating costs

### **Housing**

Need to build more houses with gardens; Harrow could release other brownfield sites or green belt; already enough flats and houses; affordable housing should also include houses and not just flats; flats will be bought and let out and be over-occupied; already have Stanmore Place so don't need another large development in the area; no new housing is needed; housing not the only important factor; more sympathetic proposals for affordable housing previously turned down; told flats would be used by hospital workers but public transport connections to hospital are not good; bigger plots are available to build rather than a cramped and dense development; should focus on abandoned buildings and unused land; affordable housing to who?; new houses should be built outside borough; building A is affordable rent and building B/C is shared ownership which suggests 'poor doors'; why build more flats when there are empty buildings and offices in harrow; properties built are not affordable housing; most units are shared ownership the contracts of which are notoriously burdensome; why so few 3 bedroom units as it is difficult for large families for find affordable housing accommodation; just pushing for highest number of housing units; only 33% of units are for social rent; most houses in the area are multi-occupancy

### **Environment, Sustainability and Ecology**

Increased pollution; water supplies are stretched; pollution will impact health; BEARS ambulance centre will be affected and should be consulted; destruction and depletion of green areas and activities such as bird watching which takes place will be sorely affected; destroying environment by building too much; loss of wildlife; impact on drainage; removal of trees; increased risk of flooding; loss of trees and natural habitats will endanger the sensitivity of the site;

### **Other**

Will increase crime and antisocial behaviour; Harrow is being overpopulated; will not benefit people of Harrow; negative impact on property value; put Harrow residents first before greedy profit; majority of people in locality against the development; money grabbing venture; access for construction traffic will be difficult; building could cause damage to adjacent buildings and railway line; impact on subsidence to surrounding properties; risk of fire; will aggravate rather than enhance social cohesion; TfL losing asset that generates regular revenue for one-off benefit; increase in population will require more employment in locality and jobs for all the new residents; development serves commercial and not community interests; gentrify other places outside London; public land should not be sold off; hooligans loitering around station on Wembley event days; application by London Labour Mayor is vendetta against Harrow East residents who have consistently voted conservative; financial benefits of proposal should be scrutinised to ensure motive is not profit. TfL and Harrow Council should not profit from building on this site; Stanmore Place development already caused a major negative impact; forcing people to seriously consider moving out of the area; many developments in the area granted are much larger than planned; strained relationships might occur between new and existing residents; quick profiteering and long-term misery for the majority of residents;

### **Comments in Support**

Should build taller so we can have integrated shopping and residential complex with access to platforms; should use space above railway more; affordable accommodation in short supply, cycle hub is a good idea, improving streetscene to park entrance, will help local businesses; urgent need of more housing; TfL in need of funding; need more affordable housing;

#### 4.5 Statutory and Non-Statutory Consultation

4.6 The following consultations have been undertaken and a summary of the consultation responses received are set out below.

### **Consultee and Summary of Comments**

#### **LBH Planning Policy**

##### Principle of Development

The Land at Canons Park Station is allocated within the Site Allocations Local Plan (2013). Specifically, the allocation of this site notes that it is appropriate for partial redevelopment of the site for residential purposes. Furthermore, it notes



that any redevelopment of the site must retain an adequate car parking provision, to continue to meet demand generated by commuters and in connection with major events in Wembley stadium. The site allocation sets out an indicative figure of 17 homes, which is set out against half of the site being redeveloped for housing. The current application for Canons Park Station proposes 118 units for the site, which is significantly higher than that envisioned under the site allocation. However, it is firstly noted that the figure of 17 units is specifically identified in the Site Allocations Local Plan as being 'indicative', and therefore any increase in numbers of units above this could still be considered acceptable. The primary balance against the quantum of housing in terms of the site allocation lies with ensuring an appropriate quantum of car parking being re-provided. Accordingly, and notwithstanding the substantial increase in housing units over and above that identified within the site allocation, residential development is acceptable. The acceptability of the quantum will be considered against all other material planning considerations.

Alongside the proposed residential development of the site, it is also proposed to provide on the ground floor of proposed building A, a Cycle Hub (Use Class Sui Generis). This is proposed to be 99sqm in size, and provide 71 cycle spaces for commuters and the general public. The use of part of this building to provide for a cycle hub is considered to be an appropriate use. A cycle hub would provide for facilitates that would assist in commuters arriving at the underground station by way of a sustainable mode of transport, rather than reliance on the private motor vehicle. This would assist in achieving the Mayor of London's aspiration for a modal shift to more sustainable transport typologies.

The principle of development at the site is therefore acceptable.

#### Affordable Housing Provision

Policy H5 of the draft New London Plan (2019)(Intend to Public Version) sets out the thresholds for major residential applications where a contribution of affordable housing is required. The application proposed 118 units and is located on public sector land, and therefore is required to make a contribution, and also at a minimum threshold of 50% (by reason of being public land). It is noted that the development proposes to offer 100% of the residential units as an affordable tenure product. By reason of offering more than the 50% (in this instance), there is the opportunity to follow the fast track route, which allows applications to not be subject to an appraisal in relation to the Financial Viability of scheme. In measuring the percentage of affordable housing on a scheme, this shall be measured by habitable rooms. This ensures that a range of homes are able to be delivered, including larger, family-sized homes.

Policy H5D states that 'Developments which provide 75 per cent or more affordable housing may follow the Fast Track Route where the tenure mix is acceptable to the borough or the Mayor where relevant'. The application proposes 100% affordable units. Given that the proposed development would provide 100% affordable housing, it could be argued that a Financial Viability Assessment is unlikely to be beneficial in this instance. Indeed if one were to be submitted and a surplus was found to be present in the scheme, it would be

unreasonable to expect the applicant to provide more than 100% affordable housing. However, Policy H5D is clear that an offer of more than 75% affordable housing must have an agreed tenure mix with the borough (in this instance).

Policy H6 (Affordable Housing Tenure) of the draft new London Plan (Intend to Publish Version) (2019), sets out how affordable housing should be split when a residential application is required to provide it. Under Policy H6A:

- 1) a minimum of 30 per cent low cost rented homes, as either London Affordable Rent (LAR) or Social Rent, allocated according to need and for Londoners on low incomes
- 2) a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership
- 3) the remaining 40 per cent to be determined by the borough as low cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.

Following on from above, paragraph 4.6.2 of the draft London Plan (2019)(Intend to Publish Version) recognises that most need is located within the social rent & London Affordable Rent given the need. The Local evidence base for housing type is detailed most recently within the West London and Harrow Strategic Housing Market Assessments (2018).

The London Borough of Harrow Core Strategy (2012) sets out that for housing proposals that trigger the requirement to provide affordable housing, these should provide the maximum reasonable, with a borough wide target of 40%. This goes onto state that the provision should also be split 60% in favour of London Affordable rent, and 40% as an intermediate product (i.e. shared ownership). The higher percentage of London Affordable Rent is a reflection of the evidenced need to provide a typology that directly assists in alleviating homelessness, whereas intermediate products do not provide this to such an extent. With regard to the Core Strategy policy requirement for 40% affordable housing, the proposed development would provide this, and within that, a policy compliant split of 60% London Affordable Rent and 40% of Shared Ownership.

As noted above, the proposed development proposes a 100% affordable housing scheme, with a total of 22 units as London Affordable Rent (to reflect the minimum Core Strategy requirement), and the remaining 96 offered as Shared Ownership (of which only circa 15 units are required to meet the Core Strategy policy requirement). By habitable room, this equates to 29% LAR and 71% S/O across this scheme.

It is therefore disappointing that the applicant in providing their affordable housing offer, has acknowledged the situation that Harrow is in with regard to its housing stock, and the pressures faced in terms of delivering affordable homes to alleviate homelessness / people in temporary accommodation, and then proposed an overwhelming quantum of an affordable tenure that is not the evidenced need and does little to address the housing pressures they have

specifically identified.

#### Genuinely Affordable Product

It is also important that these tenures are 'genuinely affordable'. The draft New London Plan (2019) (Intend to Publish Version) across each of its Affordable Housing Policies, state that the Mayor will seek genuinely affordable housing to be delivered. In terms of the London Affordable Rent, the applicant has stated that this would be let in accordance with the GLA's definition / rent levels. All service charges will be in addition to the rent. This approach is considered to be appropriate.

The Shared Ownership offer, which makes up the majority of the housing quantum, is proposed to be brought forward in line with GLA guidance. Specifically, this is stated as being affordable to households with an income of up to £90,000. The applicant does go on to state that there will be a cascade mechanism within the S.106 agreement (in the event that the scheme is approved), that will ensure for the 3 months that units would be offered exclusively to Harrow residents at locally agreed income threshold caps. This approach is encouraged. Specifically, the LPA has sought detail from the applicant to demonstrate that the Shared Ownership products being offered are genuinely affordable to Harrow residents (based on an average Harrow household income at Borough and Ward Level).

In the event that planning permission is recommended for approval, it is recommended that a hierarchy obligation be secured to ensure that housing is offered to Harrow residents first, and also are offered at capped household income levels dependent on the size of the units but for at least the 1 and 2 bed Shared Ownership units, at income levels below the Mayor's London-wide cap of £90,000 per year (as set out in the GLA Annual Monitoring Report). Following this, it should be released to West London (WLA boroughs), and then to wider London. Once released to West London and London wide, this will be at the GLA cap.

#### Conclusion

The proposed development would provide a comprehensive re-development of the site, which is acceptable in principle and welcomed. Furthermore, the proposal would offer 118 units, all of which would be offered as affordable housing, which again, in principle would be acceptable.

#### *Response to additional information provided during the applications:*

- Within 3-bed SO, rent set at 1.8% (below the Mayor's cap of 2.75%) to make these units affordable at an income cap of £74,500. This is positive and its good they've committed to it in material forming part of the application. However, it only relates to a small number of units within the policy compliant offer as the voluntary SO is 1 and 2 bed
- Cascade mechanism broadly reflects other schemes. Eligibility criteria should include those working in Harrow.
- If weight given, then voluntary SO would need to be secured in S106 and any change from this should be presented back to Planning Committee.

- Their example of SO at Burnt Oak suggests local demand (40% of sales) and that upper incomes were £64k. Purchasers had a range of ages but mostly 25-50 yrs.
- An average Harrow household should be able to afford a one bed flat. Two incomes or a high-earning single income would be required for two and three beds.

#### Energy and Sustainability

The applicant has submitted an energy statement prepared by Couch Perry Wilkes, dated 24 February 2020. The energy strategy broadly follows the energy hierarchy as required in the current and 'Intend to Publish' versions of the London Plan.

The overarching target for development in the Intend to Publish version of the London Plan is 'zero carbon', with this preferably achieved on site (where this cannot be achieved, an offset contribution may be made to the Council to undertake carbon emissions reductions elsewhere in the borough). The strategy indicates that the development will achieve overall on-site carbon reductions of 48%, which is in excess of the minimum 35% required under the London Plan. The remaining 65 tonnes of carbon will be offset at the current GLA rate of £1,800 per tonne (£60 per tonne / year x 30 years), equating to a contribution of circa £117,000 (note: once the Intend to Publish version of the London Plan is finally published, a higher rate will apply). These measures / outcomes are supported.

In terms of a communal heat network, in this particular instance (having regard to the specific development, site and location) we can accept omission of a district energy network plant room given that there is relatively low likelihood of a wider district heat network coming forward in the foreseeable future in the absence of other major development opportunities within the immediate area and the potential impact that such plant room provision would have on the footprint and bulk of the development (with potential for further impact on biodiversity and built conservation etc).

The details should be addressed through an updated energy strategy. A pre-commencement condition will need to be applied to any permission requiring the submission of a revised energy strategy that takes into account the more detailed assessment / design of the proposed ASHP system. A pre-commencement condition is considered necessary as the detailed design of the ASHP will influence the detailed design of the rest of the scheme, including potentially at foundations / lower level stages.

Any S106 agreement should include payment of the offset contribution prior to commencement of the development (based on a revised energy strategy that reflects the more detailed assessment / design of the proposed ASHP) and the verification of final carbon emissions / further offset contribution secured post-completion if actual / final on-site emissions exceed that assumed in the original offset contribution calculation. The agreement should also reflect the Mayor's 'Be Seen' requirements.

## **LBH Conservation Officer**

### Significance

The proposal is in the setting of the Canons Park Conservation Area and the grade II listed registered park and garden. This is a link to the list description: <https://historicengland.org.uk/listing/the-list/list-entry/1001394>. The Canons Park Conservation Area Appraisal and Management Strategy (CAAMS) states: 'The Canons Park Estate CA is an outstanding area given its special landscaping, openness, and good architecture. This is because it comprises a large part of the original Canons Park estate including the grade II listed mansion dating back to 1747 and surrounding landscaping'.

The NPPF defines the 'Setting of a heritage asset' as: 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.

There is a sense of isolation within much of the park from built up surroundings as there are reasonably open surroundings with surrounding development where present being low rise.

### Appraisal

NPPF paragraph 200 states: 'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably

The proposed new buildings would be visible in open views from the parkland. It is the feeling of seclusion and openness in the park that provides the conservation area and registered park and garden with a large part of its special character and appearance as noted in the CAAMS. The proposal would greatly undermine this character given the height proposed and its proximity to these designated heritage assets as well as the large amount of glazing and balconies (Juliet and full balconies) facing the park. It would also be lit up at night.

A map showing the zone of visibility would be helpful to show clearly the impact that this would have on the park. It is noted by the supporting documents that this would not be visible as far north as the walled garden which is good but it seems it would be evident further south.

In addition, viewpoint 6 in Canons Park shows the impact on the two storey house, The Lodge in Canons Park, at the entrance of the park, just beyond the end of Donnefield Avenue. The lodge is 17 metres away from the seven storey Building C. The Lodge was designed as small scale property, ensuring that the overwhelming openness and greenery of the conservation area remains part of the special interest of the registered park and garden and character and

appearance of the conservation area. In recognition of the importance of this multiple article 4 directions have been added to this property to ensure that additions require planning permission so they can be managed to ensure that they do not overwhelm it and undermine these key characteristics of the heritage designations.

The scale of the effect of the proposed new build in its setting is noted as 'large' in the Townscape Appraisal. The cross section in the Design and Access statement shows the proximity of The Lodge. Building C is too close to be screened and there is no space for 'buffer' planting. It would not be possible to provide meaningful soft landscape to screen or soften the view of the building.

The cross section (extract from the visual appraisal) shows the height and nearness of the building Building C in relation to The Lodge, and insufficient separation or space to provide a soft landscape 'buffer' or break up the view.

View 5 – the proposed development will be clearly visible from the listed Canons Park and The Lodge and will have a 'large' impact on the overall sense and atmosphere of 'openness and greenery' within the park. There is insufficient space within the development to provide softening or screening of this view.

View - 3 shows a similar impact on openness, greenery and the present relative sense of isolation from built up surroundings, from this viewpoint in the conservation area and registered park and garden.

In line with the NPPF paragraph 193, 194 and 196 any harm would need clear and convincing justification including consideration of public benefits and great weight needs to be given to an asset's conservation.

It is only a reduction in height that could alleviate/ remove the harm significantly, particularly to the building nearest the park. This is recommended. However, otherwise amending the design to omit the balconies/reducing glazing facing the park would help, as would reducing the amount of glazing facing it.

It is noted that there are public benefits to be weighed up against the harm but this should only enter the weighing up process if the design cannot be amended to avoid the harm but allow for the same benefits.

### **LBH Highways**

#### **Station Car Park**

Canons Park Station is positioned off the B461, Whitchurch Avenue. This location is easily accessible for people travelling by car from the local area and areas north of London. The station is close to the end of the Jubilee line.

The proposal seeks to reduce the capacity of the existing car park by 63% from 162 spaces to 60. This would result in a daily am and pm peak hour reduction of 200 two-way car trips. The car park is very well used, the submitted details show full occupancy on weekdays for the majority of the traditional working day.

The Transport Assessment includes a study of where people are travelling from which shows that 33% of drivers using the car park live within 2km of the station and a further 45% live within 5km. 41% of those surveyed indicated that they would consider cycling if facilities were improved at the station.

This does suggest that there is a significant number of people currently driving to the station that could potentially travel using a more active mode. To enable modal shift, it would be necessary to provide more than cycle storage; route planning, cycle training and cycle hire may increase the likelihood of people actually making a change.

The public transport accessibility level (PTAL) is rated as 4 at the station however it varies between 2 and 3 in the immediate vicinity. It would be fair to consider that public transport options are moderate at this location – three regular bus routes and the Jubilee line underground service. There are existing on-carriageway marked advisory cycle lanes along Whitchurch Lane.

A reduction in car park capacity may lead to overspill parking on-street however, there are existing parking restrictions in the roads around Canons Park station which seem to be working effectively as has been demonstrated by the parking surveys presented in the Transport Assessment. It is possible that outside of the hours of restriction, roads may begin to experience more parking demand, therefore it would be appropriate to monitor the situation with a view to increasing on-street parking controls as necessary. Funding for the monitoring and management of the Station Travel Plan will be secured via S106 Agreement, and will be for a period up to 12 months after the scheme is complete. A financial contribution of £25,000 is required for improvements to the Jubilee Cycle Network and £5,000 for work-orders related to the S278.

A reduction in public car parking can be accepted provided suitable mitigation measures are introduced.

### Residential Development

#### Accessibility

The site is within a short walk of a local parade of shops, open space and bus stops. Edgware town centre can be reached by a short bus ride or is within walking and cycling distance for those who wish to travel more actively. Edgware is a busy metropolitan centre with access to Northern line Underground services and a bus station.

Whitchurch Lane has sufficient footway widths often with grass verges and street trees. There are on-carriageway cycle lanes and nearby is a connection to the Jubilee cycle route which follows the route of the Jubilee line through quieter streets.

The proposal includes alterations to the highway in Donnefield Avenue to improve the pedestrian experience leading to Canon's Park.

These measures look aesthetically pleasing however are not completely

practical for this location. The reduction in car parking will mean that fewer cars will be parked on-site however, the road is a cul-de-sac meaning that every vehicle makes two trips and has to turn around. We do not know what the current daily traffic flows are in this location but the choice of materials and layout need to be safe and able to withstand turning manoeuvres by all types of vehicle; resin and building paving are not suitable. Raised tables are not considered necessary for this route as these are usually used at junctions and in places where speeds need to be reduced.

The intention to make this route more attractive is understood however, play equipment on a footway is not something that would normally form part of the adopted highway for safety and maintenance reasons. If the applicant wishes to dedicate any land as highway this will need to meet the requirements of the Highway Adoption Policy and would be subject to legal agreement.

A Road Safety Audit is included in the Transport Assessment. Four problems were identified in relation to the design of Donnefield Avenue; the layout and size of spaces in the public car park, access to the cycle hub, carriageway width and large vehicles overrunning on-street parking spaces. The design responses are accepted.

The recommendations in the ATZ route assessment have been noted; should the application be granted, these will be put forward to ward members for further consideration with a view to implementing those measures considered most appropriate.

#### Car Parking

The proposal is presented as a car free development and as such will only provide disabled parking spaces in accordance with Intend to Publish London Plan standards.

During the pre-application process Highways raised concerns about the suitability of the site for a car free proposal and the Transport Assessment includes a study in response. The location is rated as PTAL 3 - moderate.

Large scale, car-free developments are usually best suited to high PTAL locations where public transport facilities are excellent and there are multiple conveniences within the immediate or near surroundings.

Whilst this location has access to buses and the tube network, the nearest town is a 15-20 minute walk away.

The supplied study gives statistical details on the likelihood of people to own cars and travel by car when living in car free developments and looks at the potential for sustainable trips in PTAL 3 locations however, this does not mean that people will not own and drive cars regardless. It is clear that there is likely to be a reduction in car ownership in comparison to a development where maximum levels of parking are provided but not without some residents still keeping cars.



The parking surveys supplied indicate that there is on-street capacity in the local area which may actually counteract the car-free intentions as many of the existing parking restrictions do not operate overnight or at the weekend meaning that residents of this development would be able to work around the hours of operation.

It would be more appropriate to provide a car-lite scheme where some parking is provided for the new residents and monitor the on-street situation with a view to altering the existing hours of operation if demand for parking increases following occupation of the development. This would mean that car free living could still be expected from most residents but for those that would benefit from affordable housing but still need to rely on a private car (eg. a community midwife, health visitor or night-shift worker) there would still be some provision.

The aspiration to provide car-free developments in Harrow is supported in suitable locations but it is considered that this large scale proposal combined with a reduction in public car parking may result in overspill on-street parking which would be detrimental to the surrounding highway network without appropriate mitigation. For this reason it would be necessary to monitor on-street parking in the area surrounding the development before and after occupation to determine whether alterations to the CPZ hours are required. A contribution to fund the assessment and possible alterations will be required.

#### Cycle Parking

Cycle parking is to be provided in line with Intend to Publish London Plan requirements. The location for short stay cycle parking needs to be clarified as the Transport Assessment doesn't specify a location instead seeking for this to be subject to condition yet the Landscaping Strategy states that it will be on-street. Spaces should be provided within the curtilage of the development, off the public highway. A suitable condition should be added seeking details of the stores, their locations and securing cycle parking in perpetuity.

The cycle hub is welcomed but should be supported by further measures to persuade commuters to cycle.

#### Trip Generation

The trip generation methodology was previously agreed however the redistributed modal splits are heavily weighted towards underground trips but following the events of the COVID 19 pandemic this year, it is possible that more people will continue to work from home at a higher rate than previously seen which may result in a reduction in daily tube travel. As the development is intended to be car free it can still be assumed that the majority of trips will be made by other sustainable modes in any case.

The number of daily peak hour trips generated by the public car park would reduce by 200 if the car park capacity is reduced as proposed. This would have the benefit of improving the local environment and encouraging more sustainable travel to and from the station.

Being car free, the residential element would generate very few car journeys. Public transport use would increase, however the TA includes an assessment of public transport impact that shows that there is sufficient capacity on buses and tube trains at this location

#### Delivery and Servicing

It is understood that deliveries and servicing would take place on the highway as there is insufficient room within the development site to accommodate this activity. The anticipated 13 deliveries per day is an increase on what currently takes place in Donnefield Avenue. Whilst this isn't a significant number of journeys, as the road is a cul-de-sac it does mean that these vehicles have to enter, turn around and exit. These manoeuvres will be in addition to the trips generated by the existing properties along the road and as online commerce increases, the number of delivery trips may also increase too. There is some concern about how this would impact on the pedestrian and cycle environment for Donnefield Avenue.

DSP Monitoring – the delivery monitoring survey schedule along with details of the person responsible for monitoring should be included alongside the Travel Plan requirements that will be secured via s106 agreement. A detailed Delivery and Servicing plan should be secured by condition.

#### Construction Logistics Plan

The outline plan provided is acceptable and a detailed plan should be secured by pre-commencement condition. The plan must follow TfL guidance and should only be submitted when the contractor has been appointed and all required details are known. It is advised that early engagement with the Council is recommended in relation to traffic management at this location and discussions should be held prior to submission of the detailed CLP should permission be granted.

#### Parking Design and Management Plan

The proposed management method for the residential disabled parking would see the removal of up to 12 further spaces from the public car park should demand for the residential spaces exceed the initial provision. As the public car park is already being reduced significantly, a further reduction would leave only 42 standard parking spaces. This could result in overspill parking when the existing waiting restrictions are not operating in the evenings and at the weekends.

The residential disabled bays also need to meet electric vehicle charging requirements, therefore one space must have active provision and the remaining, passive. In relation to cycle parking security it does seem odd to not provide CCTV coverage of the residential store if it is being installed elsewhere. This would help to reassure residents which in turn encourages cycling.

#### Conclusion

The proposal to redevelop Canons Park Station car park to a residential

development of 118 dwellings and a 60 space public car park has been considered as set out above. In terms of highways impact, the proposed development is expected to result in a reduction in car trips and an increase in trips by other modes. The principle of a residential development is feasible for this site however a large scale, car free scheme combined with a reduction in public car parking is considered unsuitable for the location as it is likely to result in harm for the surrounding highway network due to insufficient mitigation measures.

*Response to Transport Assessment Addendum*

I am generally satisfied; they have provided the information that we asked for and additional mitigation measures include the Station Travel Plan and contribution for survey and implementation of works for the CPZ.

**LBH Travel Planner**

There are good measures included in the Travel Plan. We would like to see the following measures/ additions included:

- Make all printed material to be made available electronically
- Commitment to providing adult cycle training (this is listed but under 'promoting cyclist and pedestrian training) Please include separately as it will be clear you aim to provide/support cycle training for all residents
- A link to Harrow Council's website, which will have details of local events such as the Harrow marathon.
- Commit to investigating incentives through operators such as discount for residents and workers in the commercial unit. The Welcome pack should be made available electronically

In relation to the action plan a copy of the Residential Travel Pack should be submitted to Harrow Council for approval prior to occupation. The Travel Plan Coordinator timescales need to be updated as noted above.

For monitoring and review, surveys should be conducted on the anniversary of the baseline. Interim reports to be submitted to Harrow Council in years 2 and 4, which will demonstrate what progress has been made in the previous 12 months

Travel Plan monitoring fees to be secured by agreement. Amount to be detailed by agreement. In the event the Travel Plan is unable to meet targets, a remedial sum will be used to cover the cost of additional measures to support the achievement of targets. Remedial sum to be secured by agreement. A Review is to be submitted within 2 months of completion of baseline survey.

**LBH Drainage Engineer**

The submitted Flood Risk Assessment with the Drainage Strategy is acceptable. No objections subject to conditions for foul and surface water disposal, surface water attenuation and permeable paving in accordance with the standard submission requirements.

### **LBH Housing Enabling**

Provides 100% affordable housing in the following mix:

<b>Tenure</b>	<b>1b2p</b>	<b>2b4p</b>	<b>3b5p</b>	<b>4b6p</b>	<b>Total units</b>	<b>Total Habitable Rooms</b>
London Affordable Rent	0	11	11	0	22	99
Shared Ownership	48	44 (3p)	4	0	96	248
<b>Total</b>	<b>48</b>	<b>55</b>	<b>15</b>	<b>0</b>	<b>118</b>	<b>347</b>

In terms of the policy compliant 40% element of the scheme, the 99 London Affordable Rent habitable rooms represent 71% of the policy compliant offer (47% by unit), which is acceptable on a habitable room basis. However, overall this scheme proposes 71% shared ownership by habitable room (81% by unit) and comments on this are given below. Regarding, the bed size mix of the policy compliant element, the provision of 2b4p and 3b5p London Affordable Rent units for family housing is welcomed.

The London Affordable Rent accessible unit provision to be 10% of the total LAR units proposed, so that is acceptable. The Proposed units are stated to be in compliance with National and London Plan space standards. The schemes are described as being tenure blind, and as providing policy compliant wheelchair user parking and private amenity space for all units, which is welcomed. The rented units will be let at London Affordable Rent levels, excluding service charges, which is in accordance with GLA policy

However, whilst the scheme provides 100% affordable housing, the applicant acknowledges that Harrow has a small housing stock and very high demand for housing from homeless households, home seekers and tenants waiting for alternative accommodation (i.e those in need of London Affordable Rented housing). It is therefore regrettable that additional London Affordable Rent homes are not proposed, over and above those within the 40% policy compliant element.

### **LBH Environmental Health**

Sound reduction of 24dB(A) recommended but no detail has been provided as to how it meets this. Conditions suggested in relation to noise and contamination.

### **LBH Design Officer**

#### Context and Vision

The proposed buildings have a complimentary relationship with the neighbouring low-rise mansion buildings to the east of Donnefield Avenue. Accessibility is highly considered, as is legibility throughout the site and internal spaces. The scheme has potential to frame the southern entrance to Canons Park in a welcoming and materially rich way. New planting and residential

frontages to Donnefield Avenue are welcomed and increase passive surveillance, creating a more pleasant pedestrian environment. Existing mature trees to the north of Donnefield Avenue should be retained wherever possible. The relationship of the site to Canons Park should be celebrated and taken as an opportunity to increase site greening and biodiversity, acting as an extension to the park itself. The inclusion of a community garden is welcomed and should include growing space. A pocket park at the site's northern boundary balances this provision. There is potential for growing space to be incorporated at the front of the site.

Accessibility is thoroughly considered in relation to circulation within homes, general arrangements and communal spaces. Active frontages to Donnefield Avenue are highly welcome and will increase the feeling of safety and usability for pedestrians. The majority of units have either a primarily eastern or western aspect, with corresponding amenity spaces. This approach is welcomed and it is noted that no units are north-aspect only. High quality entrance lobbies with rich tiling and terrazzo elements are provided, which enliven shared spaces. The materiality of buildings sits well beside the open space of Canons Park, providing a rich architectural boundary to the copse elements of the park. Material treatment is generally well considered and the inclusion of curved elements to balustrades and entrances is welcomed and should be increased.

Front elevations are partially successful, with limited rhythm and alignment of façade elements. The specified material palette must be sufficiently different from both Rayners Lane and Stanmore sites, the current palette is presently very similar.

### **LBH Landscape Officer**

The proposed development scheme has been the subject of several pre-application meetings, including design workshops with redesign of various parts of the masterplan and various iterations of the scheme with some improvements. The proposed change of access for the crane and relocation of the commuter car park entrance towards the centre of the site, between buildings B and C were positive moves reducing the traffic driving to the end of the road adjacent to Canons Park. A space for a pocket park was created. The site is boarded by a Site of Importance for Nature Conservation – (SINC area to the west, designated as Grade II site of Borough Importance for Nature Conservation) and to the north, the approach is in the setting of Canons Park Conservation Area and the grade II listed registered park and garden. The development proposals have evolved over time and the Design Review Panel were consulted and have made substantial contributions to the design process.

The proposed development site is highly constricted, narrow, linear and tapering in shape, with a large space to the west/ northwest of the site in the car park, needing to remain open and accessible to a TfL crane vehicle, requiring a significant amount of open space to turn. This car park space area cannot be soft landscaped and therefore visual softening and a landscape setting for the back of the flats Buildings B and C would be difficult. There are very limited opportunities for creating attractive, accessible, sustainable and generous

communal amenity spaces, for the benefit of residents.

The Proposed rain gardens would be welcomed as long as there is sufficient space and the location appropriate. The concept of creating interest and incidental play along the street and a social street for residents with an enhanced approach to Canons Park could be an interesting proposal, subject to space availability for the various elements, activities and safety. However, the narrow strips of planting along Donnefield Avenue are likely to be unrealistic and trampled as a result of the play and pedestrian access.

Reservations remain as to how robust the planting will be in the small spaces and the vulnerability to trampling, dogs and people, however the planting beds could remain in the proposals. As a suggestion, there could perhaps be an agreement that if the planting was insufficiently robust to withstand the intensity of use in the area and failed over time, planted beds could be removed and paved over. It is acknowledged the trees will require maintenance over time and the size will be controlled. The appropriate species selection can be agreed through detailed design.

The limited available communal amenity space and to the rear of the development, the openness of the car park area without any proposed tree cover due to the requirement for crane access, is of concern. The larger communal garden space may be overshadowed by the building Buildings A and B. The Pocket park, may be overshadowed by Building C. The car park area hardstanding and parked cars would be an unattractive outlook and poor setting for the buildings. The proposed street has more of an urban appearance, harsh and out of keeping in the existing sub urban area with plentiful existing greenery. There is limited space available to the front of the buildings for soft landscape.

Tree planting – Proposed trees in hard areas should be installed in underground cellular systems to provide adequate volumes of topsoil to support establishment through to maturity, for example systems such as GreenBlue Urban. This would be essential in such tight urban hard surfaced spaces to be sure that the trees have sufficient growing medium to be successful to survive and thrive.

The Community garden and the Pocket garden are both proposed to be multifunctional. The space allocated within the garden will need to work very hard. The various proposed uses for the garden are ambitious in the small space, in particular in the pocket garden. The proposals for use of the small space need to be realistic.

High quality hard materials, street furniture, planting, boundary treatments and other elements including biodiversity elements have been proposed. How will this be translated into the actual build? These proposed elements are attractive images and ideas on the drawings, however, these proposals need to be practical, robust and realistic and assurance would be required that the proposals will be carried out and implemented, rather than any subsequent

value engineering and removal of high quality elements at the detailed design stage.

The information on the proposed hard and soft landscape and palettes is indicative and further details will be required to understand how realistic the landscape proposals are. A robust landscape management plan and maintenance plan, including a calendar of operations and tasks must be in place to ensure the ongoing success of the landscape proposals. The planting choices would require detailed review, more robust planting might possibly survive the intensity of use of the various small green spaces that are proposed, although doubtful in the long term

Reassurance has been provided committing to some of the issues to be addressed by detail design through planning conditions. Catalyst with its' dedicated environmental services team will look after, fully managing and maintaining the site including all the landscape. Planning conditions for the landscape will be required, as previous suggested

### **LBH Biodiversity Officer**

The western and northern margins of the site are adjacent to a section of the Borough Grade II Canon's Park and Stanmore Railway Embankments SINC which incorporates Canons Park and provides part of a strategically important Green Corridor connecting part of the chain of important sites at the northern end of the borough with more residential and more heavily urbanised sections. Although the railside embankment is supported by well-treed parkland and grassed sports areas elsewhere, the strip of SINC to the west of the development site is a relatively weak link. Any residual impacts on this following mitigation will need to be addressed.

The wider SINC area has some lateral green links to the Borough Grade II SINC's of Stanmore Marsh and Canons Lake and the Basin but the area of the borough south of the site is highly deficient in provision of access to nature and the benefits which this offers. Consideration should be given to this when accessing the impacts of the proposed development and its ongoing use.

The application is supported by a range of information including an Ecological Impact Assessment (ECIA) following on from a Preliminary Ecological Assessment (PEA) and draft EclA. Provided necessary measures are agreed to and undertaken in accordance with conditions that will need to be set, there are no reasons why the scheme should not be accepted on grounds of biodiversity.

Harrow's policies in relation to SINC designated land is that there should be neither net loss of SINC area nor value. The applicant has accepted that there will be some impact on the SINC. Regardless of whether or not the Biodiversity Ecological Management Plan, once agreed and implemented, will provide adequate net gain for biodiversity within the development red line, there will be a need to address the impacts on the SINC and the role it plays within the local nature network. I consider that with the proposed scheme there will be a need to address or compensate for the impacts either within the adjoining land or

elsewhere in the vicinity, where this would make ecological sense. This should form part of the CEMP/BEMP discussion and approval.

**LBH Arboricultural Officer**

There are no TPO restrictions within influencing distance of the site. The northern part of the site falls within the Canons Park Conservation Area. The embankment The tree survey identifies 2 'C' retention category Ash (T5, T6) and a 'C' retention category Cypress leylandii group (G7) to be removed due to their location within footprint of proposed buildings. G7 was most likely originally planted for screening purposes but which now has relatively little retention value or long term potential

The development site is narrow and linear, tapering at the southern end. The proposed new building at the southern tip of the site is in close proximity to G1 mixed species group within the SINC embankment, creating a significant pinch point where the tree canopies encroach onto the building. Facilitation pruning will be required for construction working space; the cumulative / long term impact also needs to be considered, given the future management requirements at this end of the site, where trees directly encroach or face potential future pressure for pruning / removal.

The space available for new trees on the Donnefield Avenue frontage is limited – 4m maximum between the new houses and road / parking bays. Trees will need to integrate with what is already a 'busy' area with lots of street furniture and infrastructure - in addition to parking bays, cycle racks, benches / picnic tables are also proposed beneath or nearby – when picturing the development in 10 or 15 years time, will some of these trees have already outgrown their location?

If the layout cannot be revised to accommodate larger species trees then compact / narrower form trees (eg Acer campestre 'Elsrijk' & Acer lobelii) may be more suited to constricted / urban sites

The proposed sizes given for new trees – 25-30cm girth – these will provide instant impact but will require huge amounts of aftercare / maintenance to ensure survival. If this is the proposal then sufficient funds must be set aside for aftercare / watering (min 5 yrs)

SUDS / trees within hardsurfacing: Cellular underground systems should be used to ensure adequate soil / growing conditions to new urban plantings (for example Silva Cell / DeepRoot, StrataCell / GreenBlue Urban)

**LBH Waste Officer**

Waste strategy is acceptable. No objection

**LBH Economic Development**

The Economic Development Team has no specific comments to make on the application. As a major application, we will be seeking the following to be included in any s106 agreement:



- Construction Training – a requirement to produce a training and employment plan and provide a financial contribution
- Local Supplier targets

### **LBH Vehicles Crossings Officer**

No objections as the access to the car park is existing.

### **LBH Lighting Officer**

A comprehensive Lighting Design Report has been submitted, including Lighting Masterplan, Technical & Environmental Requirements, Character Areas & Typologies and Luminaire Schedules. The developer has confirmed the use of numerous luminaires for both functional and aesthetic purposes within designated areas, as indicated on the proposed Luminaire Schedule

No lighting design calculations have been provided at this stage, including the average maintained horizontal illuminance levels or Isolux contours for any overspill horizontal illuminance to indicate anticipated levels to the properties bordering the development on both sides, but indicated a range of average maintained horizontal illuminance levels for the primary traffic route, pedestrian zone and car park area at 10 Lux Eav/3 Lux Emin, 5 Lux Eav/1 Lux Emin and 20 Lux Eav respectively.

The developer has indicated a Classification P2 for the primary traffic route, which is higher than usual for residential roads within the borough and will need to be moderated for any public maintained/adoptable areas. The Developer has confirmed that the design has been undertaken in conjunction with the Institution of Lighting Professionals, Guidance Notes for the Reduction of Light Pollution and indicated that the installation has been designed to meet the requirements of "BREEAM, New Construction and Communities 2018 (Section Ene 03 – External Lighting Criteria) and (Section SE16 – Light Pollution), which include the recommendation that efficiency is maintained and light pollution must be minimised.

Furthermore, the Developer has also confirmed alternative design guidelines BS EN 12464-2 General Circulation Area at Outdoor Workspaces, CIBSE Outdoor Lighting Guides and SLL Lighting Guide, which are acceptable. It should also be acknowledged that any new introduction of lighting in what is currently an unlit, partially lit area will have an initial impact on the location, as it is a change within the environment.

For sustainability, the developer has indicated that all external lighting (except safety and security lighting) is automatically switched off between 11.00pm – 07.00 am nominal hours of operation, I assume that the installations are controlled by Photocell – (Dusk to Dawn) or Time clock, as for standard public/street lighting operating hours. Safety and security lighting complies with lower levels of ILP Table 2 Guidance between 11.00pm – 07.00 am nominal hours

The wall mounted bulkhead luminaires on the private apartment balconies are manually controlled from each individual property. Any further opportunity for the reduction of overspill lighting/visual impact by the use of luminaire baffles/louvres and/or additional screening by trees during landscaping would lessen the impact.

### **Transport for London Spatial Planning Team**

The Canons Park Station Car Park proposed development site located on the existing NCP public car park and is bounded to the north by Canons Park, to the east by Donnefield Avenue, to the south by commercial units and to the west by the Jubilee line railway. The 79, 340 and 186 bus services call directly outside Canons Park station. The Public Transport Access Level (PTAL) for this site is 3, on a scale of 0-6b, where 6b is the highest.

The development is car free, which is strongly supported. A commuter Cycle Hub for 71 bikes is provided, which will encourage active travel.

The application is supported by Healthy Streets Transport Assessment and includes an Active Travel Zone assessment, where appropriate the Council should secure measures to support active travel and manage car demand.

### Commuter Car Park

TfL strongly supports the reduction in commuter car parking, and would encourage further reduction where possible. This will contribute to the objectives of the Mayor's Transport Strategy, and Intend to Publish London Plan, to support mode shift away from car use and promote active travel. Of the circa 5,000 daily station users, less than 4% use the station car park. Of those who park at the station, a third live within 2km of the station, and 45% within 5km, making walking, cycling and the bus attractive alternatives.

### Infrastructure Protection

The protection of the safe operation of the railway infrastructure is subject to a legal agreement between the scheme promoters, London Underground and Transport for London. Subject to fulfilling these obligations, the development does not represent an undue risk to the safe operation of the railway. This should take account of the potential scheme to provide step-free and new lift tower to the southbound platform and associated construction worksite.

### Noise and Agent of Change

In line with Intend to Publish London Plan Policy D13 Agent of Change, the accompanying noise assessment includes measures to reduce the impact of noise on future residents. These measures should be implemented and secured as part of the planning permission.

### Delivery and Servicing and Construction Logistics Plan

A final Delivery and Servicing Plan (DSP) should be secured by condition. A Detailed Construction Logistics Plan (CLP) will also need to be secured by condition in accord with Mayor's Vision Zero, including promotion of safety through the application of Direct Vision standards and Freight Operators

Recognition Scheme, and other measures.

### Travel Plan

A full Travel Plan should be secured through the Section 106 agreement.

TfL can confirm the proposed development accords with strategic transport policy in Intend to Publish London Plan and Mayor's Transport Strategy, subject to appropriate planning conditions, TfL would not object to the Council approving this application.

### **London Underground Limited**

The applicant is in communication with London Underground Engineers with regard to the development. Subject to the applicant fulfilling their obligations to London Underground and Transport for London under the legal requirements between ourselves and the promoter of the development, we have no objection to make on this application.

This repose is made as Railway Infrastructure manger under the 'Town and Country Planning (Development Management Procedure) Order 2015'. It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

### **Historic England**

On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers.

### **The Gardens Trust**

Currently the approach to the Grade II registered Canons Park (RPG) via Donnefield Avenue has no housing on the western side and the buildings are set back round greens to the east, giving a spacious feel to the approach to the RPG, and thus its setting and significance. The application site affects the setting of the RPG and the northern part of the proposed development lies within the Canons Park Estate Conservation Area (CA).

The height, a 7 storey building, and bulk of the flats will tower over any mature trees, let alone juvenile replacements if necessary, and cause harm to the views and setting of the Registered Park, contrary to the NPPF. This is also likely to adversely affect the setting of the Grade I St Lawrence Church which was rebuilt by Chandos as a private family chapel.

IN our opinion there is too little screening of the flats, most of the trees being along the railway edge, little along Donnefield Road where the flats are sited too close to the road, and non at all where the bulkier northern side of the development abuts the RPG. Such screening as there is relies on those trees on the eastern side of the road being retained.

There is a discrepancy and confusion as to the exact reduction in numbers of parking places. The travel plan shows 160 spaces down to 60 but elsewhere the

stated reduction is 102 car parking spaces, down from 156 to 54. Whichever is correct, it will lead to far more on road parking, especially as this assumes that all commuters will come either on foot, cycle or bus, which seems unrealistic. Until there is an extensive cycle network for commuters to cycle to the station, this will exacerbate an already poor situation.

In summary the GT objects to the application. We consider the proposed flats represent an overdevelopment of the site which is out of scale both with the character of the surrounding area with low rise housing, and harms the setting and views of the RPG. It will alter the skyline and bring extra noise, lighting and road traffic, contrary to the guidance in Historic England's GPA Note 3.2 'setting of heritage assets'. We consider the site is more suited to the development agreed in the local plan or could be suitable for some flats of perhaps 3 storeys in height, of a more sophisticated design with more screening and with more consideration being given to their siting as regards to their effect upon the RPG and the CA. Should your officers decide to approve this application we would hope to see conditions imposed which would benefit the management and upkeep of the RPG.

### **The London Parks and Garden Trust**

Canons Park is included as grade II in the HE Register, added in 1998, and contains a number of significant listed structures. The park is principally of significance as the surviving fragment of the great C18th landscape garden laid out for the Duke and Duchess of Chandos. The estate is so-called after the Augustinian canons of St Bartholomew in Smithfield, who owned the Manor of Stanmore in 1086. The estate had various subsequent owners, notably Sir Thomas Plummer, who is thought to have sought the advice of Humphry Repton on the landscape. The last private owner was Sir Arthur du Cros, for whom formal Arts & Crafts style gardens were laid out by Charles Mallows. The estate was eventually broken up in the early C20th, with part of the land acquired by Harrow Council as a public park and 85 acres sold for The Canons Park Estate which has retained features of the earlier landscape.

According to the test dictated by NPPF2019, p196 – any development causing less than substantial harm to a designated heritage asset must still have that harm weighed against the public benefits of the proposal. The site is presently undeveloped but given the fact there are low-rise maisonnettes already opposite the site and a single house and small lodge adjacent, we can appreciate the precedent for residential development.

However, the proposed buildings are significantly higher than anything in existence and will loom over the top of the tree canopy making them highly visible across the historic landscape. Even more so at night the light from high floors will dominate the park landscape and potentially impact on wildlife, especially when added to the large increase in vehicle movements during the day. Overall, the impact of the development on the quiet, historic character of the site will be significant and to some extent harmful.

This harm could be mitigated greatly by reducing the height and footprint of the

buildings and reducing the number of households and their cumulative needs. In addition, the design of the buildings, their constituent materials, outline and construction are also completely out of keeping with the existing character and again this harm could be ameliorated by more sensitive architecture more responsive and accommodating of the existing surroundings.

The LPGT objects to this planning application on the following grounds:  
The height, bulk and outline of the proposed buildings will have a harmful impact on the historic character of the park and be visible from many key locations within the park. The loss of the parking spaces serving the station will throw greater parking pressure on the surrounding area and potentially impact on the use of the park

Although we are not averse to a contemporary approach, the design of the proposed buildings is unsympathetic to the surrounding existing architecture and harmful to the present character.

**Conservation Area Advisory Committee (CAAC)**

The north end of the site adjoins Canons Park CA. This is a major overdevelopment of the site. Views out of Canons Park which is both historically important and an important open space at the heart of the CA will be dominated in a southerly direction by the seven storey buildings. Easterly views from the most southerly area of the park and the adjacent sports ground (also part of the CA and historical landscape) will be similarly dominated. This will detract from both the character and amenity value of the CA. The loss of over 100 public parking spaces and the provision of only four disabled residential parking spaces, will result in massive overspill parking in the locality which may not directly impact on the CA but will undoubtedly detract from its immediate environment. The application should be refused.

**Metropolitan Police Designing Out Crime Officer**

The submitted plans would not achieve a secured by design accreditation due to the lack of gating between building B and Building C. Building's B and C both have deep under crofts designed in at ground level, both are over 10 meters deep. These under crofts have absolutely no natural surveillance at all. No building with an open unrestricted access, under croft area can achieve any type secured by design accreditation.

The applicant has confirmed that a gate would be installed between blocks b and c to address the concern. There are a number of different options which will work, with security tested and certified pedestrian and vehicle gates. I believe it should ease any issues around the required secured by design accreditation. This can easily be avoided by matching the car park management plan, to existing tested and certified security products, prior to approval and building work commencement

**Environment Agency**

No Comment

**Thames Water**

With regard to foul water sewerage and surface water networks, we would not have any objection to the above planning application, based on the information provided. The proposed development is located within 15 meters of our underground wastewater assets and as such we would like an informative attached to any approval granted.

**Natural England**

No Comment

**Canons Park Estate Association**

No Comment

**Canons Park Residents Association (CAPRA)**Representation 1

We wish to register on behalf of the members of CAPRA our strong objection to the proposed redevelopment of Canons Park Station car park to provide three 7 storey buildings giving 118 flats.

This proposed redevelopment would be a gross over-development of a small site in a narrow cul-de-sac in contravention of the planning policies in the current Harrow Core Strategy Development Management policies and Site Allocation plans. It would have a devastating effect on the open street scene and views of the historic Grade 2 listed Canons Park 18C landscape. It would be totally out of character and context with the open, low density, low level suburban 'metroland' character of the area which consists of mainly detached and semidetached properties and an over-intensive use of the site.

The three bulky seven storey buildings of flats, with little amenity space, will have a detrimental and devastating effect on the residential amenity with overlooking, loss of light and privacy of the surrounding properties. Loss of parking spaces in the station car park will inconvenience commuters, reduce access to Canons Park and local sports facilities and put pressure on local roads especially on Wembley Event days. There will also be a knock-on effect for emergency services and delivery vehicles, with increased delivery services and lack of parking and passing space in the narrow road which has a locally accepted dangerous junction with Whitchurch Lane.

A number of much smaller local planning applications have been restricted / refused due to the heritage aspects / impacts on the area, so how can this proposal even be considered?

Finally there is a chronic lack of infrastructure in the area and along with the development at Stanmore Place this proposal will only make matters worse:- the area cannot cope.

Representation 2

I wish to register CAPRA's total opposition and objection to this incongruous project which defies all planning norms and which constitutes a grotesque over-

development, totally out of character and scale to the area and especially disastrous to the residents of Donnefield Road and to the whole of Canons Park environs. While recognising the general need for really affordable housing for London, this is the wrong site, as it provides vital car-parking that serves a wide area and is necessary to the functioning of the transport system of TfL and for preserving the quality of life in a fast deteriorating environment of Canons Park.

The main reasons for our objection, with reference to both Harrow Core Strategy (2012) and The National Planning Policy Framework (2019):

1) GENERAL: HCS (2012) versus NPPF (2019)

While the Harrow Core Strategy (2012) is very clear and reasonable over what should be built on this site, the planners and Council may feel emboldened to apply NPPF (2019) which implies that the greater benefit for need for housing should override any other planning consideration. But they cannot apply a wider benefit to a whole Borough that will override the detrimental impact that the development will have to the existing immediate residents and the local area relating to the proposed site.

The Draft London Plan NPPF 2019 has not been widely disseminated, and is so full of bureaucratic jargon that lays an emphasis mainly on housing target numbers and cramming the maximum number of units on small sites without highlighting good design or context or the impact or relation of the type of development on the surrounding environment. This type of ‘target planning’ has been disastrous in the past and has created problems of overcrowding and unacceptable impact on adjoining residential streets. HCS (2012) seems more sensible in proposing that this site is suitable for 17 homes along the existing street “and retention of adequate car parking to serve the station.”

While recognising Harrow’s affordable housing need, it has been exacerbated by the approval of huge major developments that were targeting the high end housing market (cf. the damaging luxury Elysian development in Stanmore with no affordable housing) and were allowed to provide a smattering of ‘affordable units’ over decades. While this current proposal has the still-to-be-adjudicated so-called ‘affordable’ rental and sale units, one cannot cram such a huge number of units on every site without taking the local context and character into consideration. The quality of life and good design are very important, including the impact on the existing population around the area. This proposal fails to achieve the necessary high standards required.

1. Consultation:

The architects say the design was developed with extensive consultation with the local community, yet has shown no substantial change to the design despite strong protests from residents and institutions in Donnefield Road and in the wider area. The scheme was progressed and developed in relative secrecy with no intention, as the architects confirm, to alter the basic essentials of the design, obviously dictated by the politicians and planners. It is a disgrace that the “extensive consultation with the planning officers” has produced such a grotesque and disastrous scheme that will be detrimental to the whole

atmosphere and environment that relates to the park.

## 2. Car Parking

The absurd practice of providing no car spaces for residents, pushes the traffic problem onto surrounding streets that are already traffic ridden with widespread restricted parking. Reducing car parking provision for the public again creates overcrowding on surrounding neighbourhoods. No solution has been proposed to the removal of this major repository of car-parking for the nearby Hive, for Wembley Events, and for commuters needing to refrain from taking their cars into central London. Alternative possible schemes retaining the existing car park with housing on top, or by burying the car park in a basement, with housing over it, should have been explored.

As required by allocation H17 in HCS (2012), the proposal must also provide adequate parking to serve the station. The submitted Transport Assessment demonstrates that 80% of the existing parking spaces are occupied by 9am (equating to 130 spaces). As such, there is a clear need for the continued provision of over 100 parking spaces on the site. The only justification given to reduce the number of spaces by over 100 (from 162 to 60), is that some commuters surveyed could travel by other means or routes. As such, the report provides an assessment of capacity for car parks within a 15 minute walk of the site which might be available to accommodate overflow capacity. Its highly unlikely that any commuter or visitor would walk 15 minutes on top of their existing journey time, and we consider this to be an overall under-provision of parking for the site which contradicts allocation H17. But there are relatively few available spaces for car parking, even within 15 minutes of the Station.

## 3) Transport Impact

It is surprising that no provision, as a priority, has been made in such a drastic scheme, for lifts up to the platforms of Canons Park Station, except in the distant future when the ambulance servicing station is possibly relocated, to be replaced by yet another horrendous seven story building! Elderly and disabled people are not properly catered for under the Disability Discrimination Act.

No suitable justification is provided for the significant loss of car parking spaces associated with the station. Despite amendments to the proposals, the resulting scheme will still encourage a significant increase in vehicles along Donnefield Avenue with the car park entrance located halfway down. Furthermore, as stated in the Transport Assessment this will significantly increase on event days at Wembley. Its highlighted solution to the increase in vehicles will be the 'spare' capacity of on-street car parking on Donnefield Avenue and the surrounding roads. This directly conflicts with Policy DM 42 which resists development which would create significant on-street parking problems. Accordingly the loss of the existing car park has not been fully considered in relation to the impact on the surrounding area.

The proposed use of Donnefield Avenue for all servicing and deliveries is also entirely inappropriate for a scheme of this scale. Being the sole access to the Canons Park Activity Centre as well as a number of residential dwellings (and



the main access to Canons Park), the use of this road (which will only be 4.1m wide once amended for the proposal) by a 3.7m wide refuse vehicle will building all traffic movements and access causing huge disruption whilst the vehicle collects waste associated with 118 dwellings (in three separate bin collection areas). We also query how the refuse vehicle will turn around on Donnefield Avenue in the absence of any turning circle on the road.

The assessment has also failed to consider the impact of the proposal on the adjacent ambulance centre in terms of emergency vehicle movements.

### 3) Overdevelopment.

It is patently obvious that this sliver of a site is crammed with a much-too-high urban type of development that is entirely unsuitable in this location.

Whilst it is acknowledged that the site is allocated for partial residential development in accordance with Allocation H17, the proposed quantum of development is seven times greater than envisaged by the allocation. We consider this constitutes an overdevelopment of the site. which is required (as per H17) to provide adequate car parking to serve the station and a sensitive response to nearby heritage assets, neighbouring properties and nature conservation areas.

In addition to the above, we consider the proposal to constitute overdevelopment of the plot, as it fails to provide sufficient amenity and child's play space for the quantum of development proposed. By only providing 274 sq. m of amenity space on site (combined for children and adults) the proposal falls short of even the child's play space requirement for this area (based on mix proposed) of 471. 3 sq. m. There is limited opportunity for landscaping within the development and this gives the overall impression of the development being constrained on its plot.

The buildings are also placed within very close proximity to one another with Buildings B and C having a separation distance of just 12m, this causes concerns in respect of overlooking between the buildings as well as the quality of accommodation proposed in terms of outlook, internal daylight and sunlight. The Daylight and Sunlight Report by GIA confirms that 14% of rooms within the development will not achieve BRE Average Daylight requirements. This, again, indicates an overdevelopment of the plot as the proposed accommodation is not able to achieve a reasonable level of daylighting despite having very few surrounding constraints.

### 4) Design Aspects

Generally the architectural design of the scheme is rather pedestrian and severe, and does not relate to the 1930s feel of the station or the housing opposite. The dual aspect of the two larger buildings makes the flats on the western side face the embankment of the station and would be subject to continual noise and pollution. The elevation of the buildings on this side are bleak, with huge walls of brickwork reminiscent of tenement slum buildings.

The buildings do not have a 'horizontal emphasis' because they are crammed all along the narrow site, on very narrow already congested road. They are depressingly vertical and crush anyone who walks down the narrow pavement with the cliff barely a metre away from the pavement line. Using brick in such a mass is oppressive and creates more of the look of prison buildings than the suburban two and three storey housing that fits the scale and character of the area.

The entrance halls, with tiling and metal balustrades for the staircases would be very noisy and look rather clinical. The internal corridors would be dreary, dark and claustrophobic.

The development will produce a far from a "Healthy Street' with huge traffic, cycle and pedestrian congestion, with no decent manoeuvring space for refuse, emergency, delivery vehicles. To have one refuse chamber for each building will make it difficult for residents to organise their rubbish for bringing down seven storeys, and could cause smells and overflowing at street level.

Furthermore, so many units will put a huge strain on already overloaded statutory services, and it will make it difficult to find more GP surgeries and schools to cater for such a huge influx of families.

#### 5) Amenity Space

The community space and pocket park are derisory, located between the gable ends of two six/seven storey buildings and certainly do not cater for community space for such a massive development, even if the flats have private balconies.

By only providing 274 sq. m of amenity space on site (combined for children and adults) the proposal falls short of even the child's play space requirement for this area (based on mix proposed) of 471. 3 sq. m. There is limited opportunity for landscaping within the development and this gives the overall impression of the development being constrained on its plot.

The narrow play-on-the-way spaces with such a large population from the flats and the huge number of bicycles will actually obstruct and be dangerous for pedestrians using the road and on the way to the park, and will affect the amenity of privacy and outlook of existing residents of Donnefield Road. They will certainly not reap the benefits of such a huge influx of flat dwellers.

#### 6) Character & Scale Of The Local Area

The proposed development is entirely out of context with the prevailing patterns of development in the locality and fails to respond to the sensitive character of the area. The proposed seven storey buildings appear at odds with the existing 2-3 storey properties along Donnefield Avenue and entirely incongruous in the context of the Listed Canons Park. Accordingly, we consider that the proposed height and massing of the development contravenes Policy DM1 of the Development Management Plan which requires due regard for the site context as well as the provision of appropriate space around buildings and consideration of the visual impact of the development from within buildings and outdoor

spaces.

Sadly the design of the buildings in 7 storey mansion buildings is totally out of character with the suburban nature of the area and the large number of units will be unsustainable in such a small space. It will wreck the whole sense of what Canons Park is about. There is so much building coverage of the site that leaves little space for generous landscaping or tree planting, even with removing the bulk of existing trees on the northern part of the site. Compare the generous space in front of the two and three storey flats opposite, with the only 1 metre set-back in front of the oppressive cliff of brick housing that will dominate and overlook the existing flats and ruin the pastoral views and 18th Century landscape of Canons Park of almost prime importance in historic parks in the UK.

#### 7) Heritage Aspects

The impact on nearby heritage assets is best considered in the context of the submitted Heritage Report and Townscape and Visual Assessment. The Canons Park Conservation Area view particularly is noted as having a medium to high townscape value, as well as being essential to the setting of the Grade II Listed Mansion and Walled Gardens. Arguably Viewpoint 4 gives the best image of this context and has been omitted from the assessment which is unfortunate. Notwithstanding, Viewpoint 5 provides a helpful context and the assessment concludes that this view would feature a medium to high level of impact on a view which is noted as protected and sensitive. On this basis, the proposal cannot be considered to represent a sensitive response to the area, as required by allocation H17.

The heritage report on archaeology of the site is produced by MOLA via the commercial development consultancy CBRE which is done with the intention to “help our clients to achieve planning consent and discharge planning conditions” so cannot be seen as objective assessors of the heritage aspects. Their assessments are subjective and do not come to fair conclusions.

It is risible to claim that the design “embraces and complements the heritage setting of the site enlivening Donnefield Avenue and activating the entrance to Canons Park’ when such an overbearing and massive cliff towering over the narrow road, actually destroys the whole aspect of the site and the relationship with Canons Park.

The design simply is not “sympathetic or complementary to the historic context of the adjacent Canons Park” and MOLA leaves out important viewpoints, such as the view looking towards the site when entering from Whitchurch Lane, where in contrast to all the buildings of Arnold House and the playing pavilions, which respect the horizontal landscape of Canons Park, the proposed housing scheme of urban scaled mansion buildings will tower over the landscape, ruining the harmony and atmosphere of the park.

Both the Design Review Panel and Historic England in their assessments have recommended a reduction in the height of the scheme that would affect the

historic nature of the Park.

'The proposed new buildings would be visible in open views from the parkland. It is the feeling of seclusion and openness in the park that provides the conservation area with a large part of its special character and appearance as noted in the CAAMS. There is some concern that this proposal would then undermine this character given the height proposed and its proximity to these designed heritage assets....A further view north among the listed park structures might also be affected. In line with the NPPF any harm would need clear and convincing justification and great weight needs to be given to an asset's conservation.'

'The design should be amended to ensure the building better reflects the character of the surroundings.'

#### 8) Environmental Aspects

Important parts of the site and also sections contiguous with the site in the northern section of the car park and the western section of the embankment are designated a Site of Importance for Natural Conservation (SINC) Grade II. These contain important species of wildlife including bats and other flora and fauna, which the study presented warns that the whole construction process can produce serious harm to the SINC.

The SINC nature of the site will be destroyed with the loss of a major belt of trees and the uprooting of almost all of the existing vegetation and the loss of individual trees that provided some shielding of the railway noise. Now residents of the proposed building will be jammed against the raised bank and exposed to the constant noise of trains passing.

#### 9) Conclusion

From the evidence given above, it is clear that this scheme should be refused, and that another more modest scheme of no more than three storey's high as appropriate to the site and its historic and environmental importance should be explored, while retaining most of the existing car park spaces. This should be done with close consultation with the local residents and their approval before it goes back to the planning committee.

#### **Friends of Canons Park**

I am writing in my capacity as Chairman of the Friends of Canons Park and wish to register our objection to the proposed development of the Canons Park Station Car Park.

Canons Park is noted as having a medium to high townscape value as well as being essential to the setting of the Grade II Listed Mansion and Walled Garden. The proposed high rise development would bring an unacceptable impact on these heritage assets. The proposed development is entirely out of context with the prevailing patterns of development in the locality and does not fit with the sensitive character of the area. The new development consists of three 7 story buildings set against the existing 2 & 3 story properties along Donnefield Avenue and would be entirely out of place in the context of the listed park.

To comply with the National Policy Planning Framework any harm to the significance of a designated heritage asset should require clear & convincing justification. For a Grade II listed Parks or Gardens this justification should be exceptional.

The Harrow Sites Allocation Plan allocates the site for 17 new homes and the retention of adequate car parking to serve the station. The new proposal represents a nearly seven fold increase in the number of homes which is contrary to the Council's own planning policy document and represents a gross over development of the area.

The proposal also reduces the number of parking spaces from 162 to 60. This is also clearly contrary to the published policy of providing adequate car parking for the station. Given that there is a much larger development at Stanmore Station car park happening simultaneously, this will inevitably result in a huge rise in nuisance on-street parking in the surrounding area from commuters trying to access the underground system. The station car park also provides valuable parking for people attending events at Wembley, The Hive Football Ground and any events which are run in the park (including the regular 'Park Run' held every Saturday which has regularly attracted in excess of 150 runners).

Donnefield Avenue is a cul-de-sac and is the main access point into the Park for park maintenance vehicles and emergency vehicles should they be required. It is also the only access for the Canons Park Activity Centre (which uses coaches to transport children) as well as a number of residential properties. Should this proposal go ahead it will also be the only route to service the 118 new units with refuse collection, deliveries and services. The use of this road by wide vehicles such as refuse lorries or grocery delivery vans would building all traffic movements including any emergency vehicle trying to access the park.

For all the above reasons we consider this development to be inappropriate and should not be permitted to proceed

#### **The Stanmore Society**

Would detract from character and setting of CPCA. Views out of CP which is historically important and an important open space at the heart of the CA will be dominated in a southerly direction by proposed buildings. Easterly views will be similarly dominated which will detract from character and amenity of CA. station car park acts as a park and ride travelling into London or events at Wembley - will result in overspill parking. green spaces and openness are much appreciated by residents and visitors. Social infrastructure will be taken beyond breaking point

#### **Harrow Friend's of the Earth**

Harrow friends of the earth recognise the urgent need for genuinely affordable and carbon-neutral new family housing. We therefore support, in principle, well-designed schemes that satisfy this need on suitable brownfield sites with access to all sustainable modes of transport and close to local facilities. we therefore

support in principle the proposed housing development at Canons Park Station car-park.

we consider the reduction in car parking and increase in cycle parking to be an added advantage of this scheme. reduction in car use has a vital role in addressing the climate emergency and in making the streets safer and healthier for cyclists and walkers. while the need of disabled people must always be a major consideration, in general people travelling to their local facilities, including stations, should be encouraged and enabled to make the journey by walking, cycling or using a local (zero-emissions) bus. Wherever such alternatives are available, car use should be actively discouraged.

we hope however, that consideration will be given to improving the development in the following ways:

- increasing the proportion of housing available at london affordable rents
- decreasing the amount of commuter parking to no more than the level specified at the exhibition
- providing a means of access to the station platforms from the car park and the new housing that can be used by people with mobility disabilities

However, considering the likely long-term implications of COvid-19 we believe that, among others, the following principles should be followed in any new significant housing development:

- there should be fewer new flats (especially high rise) and more family houses with gardens
- safe, convenient and preferably, car free -active travel- routes to local green space should be provided. Flats should preferably have direct access from outside. where this is not possible, communal entrances should allow for contactless use and staircases, lifts and corridors should be regularly cleaned and designed to allow for social distancing

#### **Canons Ward councillors (Cllr Thakker, Cllr Jogia and Cllr Moshenson)**

As Ward Councillors we would like to record our strong objection to the planning application. We urge the committee to reject the planning application for being over populated, lacking sufficient parking and damaging to the views of award winning park.

#### Loss of Light and overshadowing

The proposed buildings are overbearing on properties on Donnefield Avenue which is made of two and three storey properties. The proposed 7 storey properties are on the east side of the road casting long shadows over the neighbouring properties. The proposed buildings are far taller than the platforms of Canons Park station and are in proximity to the houses on the west side of the road.

#### Overlooking and Loss of Privacy

the site for the Canons Park station is tightly situated between properties in Donnefield Avenue, the station's platforms and bordering on the other side of the platforms, residential area of Cheyneys Ave. The proposed development

would overlook gardens and houses and its height would present a loss of privacy to nearby residents.

#### Parking and Traffic

The scheme itself proposes to be with zero space for cars, however the developers admit that there is nothing that would restrict residents from owning cars and parking them in nearby streets. Already congested for parking on most days and with multiple traffic and parking controls that were introduced to surrounding areas in the last decade, proposing that residents should park, if they so wish, in nearby streets would create undue burden on the traffic and parking conditions in surrounding streets, would require the Council to introduce further parking controls and increase the cost of enforcement in the area. This argument is founded in fact from existing schemes where the development of Hitchin Lane restricts the number of cars in the development and has led to drivers congesting nearby streets parking sometimes irresponsibly and unsociably.

#### Effect on Conservation Area / Visual Amenity

The proposed development looms over Canons Park an award winning park with historic importance that is currently dominated by the tower of St Lawrence's Church, a listed church with 900 years of history. The proposed towers would be clearly visible from the Spinney in the park, will dominate the skyline to the west of it and will obstruct the views of the church from the Canons Park station platform. Canons Park, which lends its name both to the station and the ward would be dwarfed in the shadow of these buildings.

#### Loss of Station Car Park

Canons Park station is a busy station that is serving predominantly commuters and spectators both to Barnet Football Club at the Hive and on Wembley event days. The loss of parking at the station would lead to greater congestion in nearby streets and would cause a significant issue for event days. The Council very much relies on the capacity of this car park to limit the number of people driving into London and Wembley and to spread the pressure on traffic. With the loss of the car park, drivers would be forced to either find a street parking on the already congested streets or venture into less served areas of the borough creating traffic, road safety and anti-social parking as they attempt to get to work or to Wembley.

While the developer's ambition to create additional affordable housing should be applauded, we believe that the current design of the scheme creates issues which should be resolved with due attention to the character, traffic and history of the area and that the applicant should offer a new plan that retains parking and has less visual impact on the surrounding area.

#### **Canons Park Estate Residents Association**

The blocks are too high and will look bulky and out of character certainly not convivial in a Grade 2 Conservation Area. No provision has been made to accommodate a lift nor an escalator for those who find it difficult to walk up nor those disabled and in a wheelchair.

Please accept this note on behalf of the Canons Park Estate as a refusal to the application for this development

**Aylward Estate Residents Association**

There should be no development of Canons Park Station car park – or indeed any station car park at all. The car park is full every day (in normal times) so there is evidently no lack of demand. The whole point of station car parks is to encourage people to journey into London by public transport, and to merely state that ‘people should use other forms of transport to get to the station’ is disingenuous. The whole scheme should be cancelled.

**Navin Shah AM**

I refer to the above application and confirm my objection on the following material planning grounds.

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.

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.

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).

## **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 considered against the adopted London Plan (2016) policies, significant regard has also been given to policies in the Publication London Plan (2020), as this will replace the current London Plan (2016) when published and form part of the development plan for the Borough.

5.5 The Publication London Plan was originally published in draft form in December 2017 and subject to Examination in Public (EiP) with the Panel's report received in October 2019. The Secretary of State issued two sets of directions on policies in the subsequent London Plan (Intend to Publish Version) (2019). The Mayor of London has accepted the Secretary of State directions and has now sent the Publication London Plan (2020) to the Secretary of State for final approval to publish. As such, the entire Plan can be given significant weight. The Secretary of State has until the 1st February 2021 to either agree the Plan or issue further directives. Should the Publication London Plan (2020) be agreed by the Secretary of State, the Mayor of London will be in a position to publish it, thereby

superseding the London Plan (2016) and giving it full weight as part of the Council's development plan.

5.6 The Publication London Plan (2020) is a material planning consideration that holds significant weight in determining planning applications, with relevant polices referenced within the report below and a summary within Informative 1.

## **6.0 ASSESSMENT**

6.1 The main issues are;

- Principle of the Development
- Housing Output
- Townscape, Character, and Design Quality
- Heritage Assets
- Residential Amenity and Accessibility
- Transport and Parking
- Landscape and Ecology
- Climate Change and the Environment
- Planning Obligations and Infrastructure

## **6.2 Principle of Development**

6.2.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2016): 2.8
- The Publication London Plan (2020): GG2, H1
- Harrow Core Strategy (2012): CS1A, CS1H, CS1I, CS8I
- Site Allocations Development Plan Document (2013): Site H17

6.2.2 The London Plan sets out to meet London's growth with the boundaries of Greater London. To address a gap between projected housing requirements, including a backlog of need and identified capacity, the London Plan expresses housing targets as minima. Harrow's minimum housing target is 593 homes per annum over the period 2011-2021. Policy H1 of the Publication London Plan (2020) increases the minimum housing target to 802 homes per annum over the period 2020-2030.

6.2.3 Harrow's Core Strategy establishes a clear vision for the management of growth in the Borough over the Local Plan period (to 2026) and a framework for development in each district of the Borough. Policy CS1(A) directs growth to the Harrow and Wealdstone Opportunity Area and throughout the rest of the borough, within town centres and strategic, previously-developed sites. The policy provides for that growth to be managed in accordance with the relevant sub area policies. Policy CS8(I), for the Edgware and Burn Oak sub-area, encourages the redevelopment of identified, previously developed sites to collectively contribute at least 1,229 homes towards the Borough's housing allocation. This is to be brought forward in accordance with Core Policy CS1(H),

which details that the Area Action Plan for the Harrow & Wealdstone Opportunity Area, and the Site Allocations Development Plan Document for the rest of the Borough, will allocate sufficient previously developed land to deliver the required housing targets.

- 6.2.4 Within the context of planned growth across London, the proposal therefore accords with Harrow's vision for the development of the Borough as a whole and for the Edgware and Burnt Oak sub area. Specifically, the proposal for the provision of housing on the site is consistent with the Strategy's broader objective to meet development needs on previously developed land, and to do so in sustainable locations, without resorting to development on greenfield and garden land.

#### Delivery of Site Allocation H17

- 6.2.5 Turning to the detail of the site's allocation, it is included as Site H17 of the Harrow Site Allocations Development Plan Document (2013). The allocation is for a partial redevelopment of the site for residential purposes, while retaining adequate car parking provision, to continue to meet the demand generated by commuters and in connection with major events at Wembley stadium.
- 6.2.6 The site allocation includes an indicative figure of 17 homes for the residential use. The commentary to the site allocation details the housing capacity is indicative, based on half of the site being redeveloped for housing. The methodology for calculating the potential residential capacity of sites is explained at Appendix B of the Site Allocations Local Plan document; the appendix notes that housing capacity figure attributed to each site is indicative not prescriptive and that the actual number of dwellings that may be achieved on each site may be determined by many considerations, including design & layout, the size & type of homes to be provided and scheme viability.
- 6.2.7 In terms of output, the subject application proposes 118 units for the site, which is significantly higher than that envisioned under the site allocation. Within the strategic policy context and taking into account the indicative status of the housing capacity figure included in the site allocation, it is considered that the increase in the housing output of the site could still be considered acceptable.
- 6.2.8 The primary balance against the quantum of housing in terms of the site allocation lies with ensuring an appropriate quantum of car parking being re-provided. The commentary to the site allocation notes that any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere. The station car park currently provides 162 spaces. The subject application would retain 60 car parking spaces and would also provide a TfL Cycle Hub. While it is acknowledged that the provision of the Cycle Hub provides a (sui generis) is not identified in the allocation, officers acknowledge that this would be integral to support the modal shift to more sustainable methods of transport in arriving to Canons Park Underground Station, thereby supporting the requirement to retain sufficient

commuter parking. The transport and parking impacts of the proposal have been considered in detail within section 6.7 of the report. The Council's Highway Authority have concluded that a reduction in the public station car parking can be accepted, provided suitable mitigation measures are introduced, which are to be secured through appropriate planning obligations and conditions.

- 6.2.9 The proposal would acceptably deliver the residential component of the site allocation and re-provide an appropriate quantum of commuter car parking capacity on the site. The principle of the site's allocation in the Harrow Local Plan was in recognition of the site's potential to deliver residential development, helping to meet the Borough's projected needs in a way that is consistent with the Borough's spatial strategy. This includes the delivery of housing on brownfield land and directing growth to areas with good public transport accessibility. On this basis, Officers consider that the principle of development would be acceptable, and the proposal would comply with the relevant policies in this regard.

### **6.3 Housing Output**

- 6.3.1 The relevant policies are:
- National Planning Policy Framework (2019)
  - The London Plan (2016): 3.3, 3.4, 3.8, 3.10, 3.11, 3.13,
  - The Publication London Plan (2020): GG4, H1, H4, H5, H6, H10
  - Harrow Core Strategy (2012): CS1I, CS1J, CS8I
  - Harrow Development Management Policies (2013): DM24
  - Mayor of London Affordable Housing and Viability Supplementary Planning Guidance (2017)
  - Mayor of London Housing Supplementary Planning Guidance (2016)

#### Affordable Housing, Mix and Tenure

- 6.3.2 Affordable Housing is detailed in the National Planning Policy Framework (2019) as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the definitions within the following: affordable housing for rent, starter homes, discounted market sales housing or other affordable routes to home ownership (including shared ownership).
- 6.3.3 The proposed development triggers an affordable housing requirement as it constitutes a major residential development. Policy H4 of the Publication London Plan (2020) sets out a strategic target for 50% of all new homes delivered across London to be genuinely affordable. The policy also specifically requires that 50% of the quantum of housing is delivered as an affordable product on public sector land.
- 6.3.4 Having regard to Harrow's local circumstances, Policy CS1(J) of the Core Strategy sets a Borough-wide target for 40% of all homes delivered over the plan period (to 2026) to be affordable, and calls for the maximum reasonable amount

to be provided on development sites. In terms of dwelling mix, London Plan Policies makes reference to the priority that should be accorded to the provision of affordable housing. Policy DM24 of the Development Management Policies requires development proposals to secure appropriate mix of housing on site and to contribute to the creation of inclusive and mixed communities, having regard to the target mix for affordable housing set out in the Councils Planning Obligations SPD. Considerations include the priority to be afforded to the delivery of affordable family housing, the location of the site, the character of its surroundings and the need to optimise housing output on previously developed land.

6.3.5 In terms of tenure split, the strategic part of Policy 3.11 of the London Plan (2016) calls for 60% of affordable housing provision to be for social and affordable rent and for 40% to be for intermediate sale or rent. The Publication London Plan (2020), recognises that for some boroughs, a more broader mix of affordable housing tenures will be appropriate and therefore provides a degree of flexibility based in the overall tenure mix. Policy H6 of the Publication London Plan requires a minimum of 30% homes to be affordable rent or social rent, 30% to be intermediate products which meet the definition of genuinely affordable housing, and the remaining 40% to be determined by the borough as low cost rented homes or intermediate products.

6.3.6 The application proposes to deliver all the proposed residential units as affordable housing. By reason of offering more than 50% affordable housing, the application has followed the 'fast track route' (as set out in Policy H5 of the Publication London Plan), which allows applications to not be subject to an appraisal in relation to the Financial Viability of the scheme. The proposal would have the following tenure and unit mix:

**Table 1: Tenure Mix**

	<b>Total Units</b>	<b>% of Total</b>	<b>Total Habitable Rooms</b>	<b>% of Total</b>
<b>London Affordable Rent</b>	22	19%	99	29%
<b>Shared Ownership</b>	96	81%	248	71%
<b>Total</b>	118		347	

**Table 2: Housing Mix**

	<b>1 Bed</b>	<b>2 Bed</b>	<b>3 Bed</b>	<b>Total (units)</b>
<b>London Affordable Rent</b>	0	11	11	22
<b>Shared Ownership</b>	48	44	4	96
<b>Total</b>	48	55	15	118
<b>Percentage Mix</b>	41%	46%	13%	100%

- 6.3.7 In order to comply with the Core Strategy Policy requirement for 40% affordable housing on all the units proposed, this would equate to an approximate requirement of 47 units out of the 118 to be affordable. The Mayor's Affordable Housing SPG details that the percentage of affordable housing in a scheme should be measured by habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes. Having regard to this, the 40% requirement would be the equivalent to 139 rooms to be provided as affordable rent. When taking the policy compliant split (60/40) into account by habitable rooms, this would require approximately 83 rooms to be provided as London Affordable Rent and approximately 56 rooms to be provided as an intermediate tenure. The proposed 22 London Affordable Rent units would consist of two and three bed family units and would equate to the provision of 99 rooms (or 71% by habitable room) as London Affordable Rent. This exceeds the minimum policy compliant split as required by the Core Strategy Policy. Given the smaller unit sizes proposed for the Shared Ownership units, the required 56 rooms to complete the minimum 40% Core Strategy requirement could (for example) be made up by 19 x two bed Shared Ownership units.
- 6.3.8 In relation to the local requirement for 40% of the overall units to be affordable housing, and the appropriate tenure split within that, the proposed development would be compliant in this regard. In relation to the London Affordable Rent units, the provision family-sized units (2 bed and 3 bed units) would meet the priority need of the Borough and two of the London Affordable Rent units would also be wheelchair accessible, which is welcomed. Officers are therefore satisfied that the proposal would also comply in this respect. The remaining 208 habitable rooms (i.e corresponding number of units depending on the configuration of the policy compliant requirement intermediate housing provision above) would be offered as Shared Ownership.
- 6.3.9 The Harrow Strategic Housing Market Assessment was completed in 2018, which formed part of the West London Strategic Housing Market Assessment. In terms of affordable housing tenure, the report concludes that the need of 9,600 additional affordable dwellings over the 25 year period 2016-41 (an average of 384 per year). Of this, the demonstrable need is for 70% at social rent and then 30% as intermediate products. It is therefore regrettable that additional London Affordable Rent homes are not proposed, over and above those within the 40%

policy compliant element, as this tenure is in high demand in Harrow to meet priority housing need.

- 6.3.10 Notwithstanding the priority need for London Affordable Rent housing, Shared Ownership is nonetheless defined as an affordable housing product and it is therefore necessary to recognise that the scheme would nevertheless be delivering a 100% affordable scheme. The proposed Shared Ownership units would have a satisfactory mix which is skewed towards one and two bed units as set out in the Council's Planning Obligations SPD. However, as set out in the Publication London Plan (2020), these tenures would need to be genuinely affordable.
- 6.3.11 In order to demonstrate that the proposed Shared Ownership units would be genuinely affordable, the applicant has submitted an Affordable Housing Supplementary Note. This details the minimum income requirements for each of the unit types. It is acknowledged that the minimum income would comply with GLA requirements and the 1 bed units (comprising 50% of the shared ownership units) and the 2 bed units (comprising 46% of the shared ownership units) would be accessible and affordable to Harrow residents. The proposed 3 bed units would also have a lower rent of 1.8% (which is below the Mayor's cap of 2.75%). Furthermore, the applicant has agreed to a cascade mechanism which would offer the Shared Ownership units exclusively (for a period of no less than 3 months) to eligible purchasers whose primary place of residence at the date of purchasing the relevant Shared Ownership unit falls within the London Borough of Harrow. The cascade mechanism would also include an income cap to ensure the proposed tenure represents a genuinely affordable offer for Harrow residents.
- 6.3.12 The Affordable Housing Supplementary Note also provides a comparable example for the demand for Shared Ownership at a recently completed development on Burnt Oak Broadway by Catalyst for 46 units. The development on Burnt Oak Broadway suggested local demand for Shared Ownership (40% of purchasers within local postcodes). The predominant purchaser group was between the late 20s and early 30s, however, there was demand across all age demographics.
- 6.3.13 Officers consider that subject to securing the cascade mechanism and the income caps set out above, the proposed Shared Ownership tenure represents a genuinely affordable offer for Harrow residents. On this basis, the additional shared ownership units delivered above the policy requirements and the overall provision of 100% affordable housing, which includes a policy compliant level of family sized London Affordable Rent units, should be afforded moderate weight when considering the public benefits of the proposal.

#### Housing Supply and Density

- 6.3.14 London Plan and Local Plan policies on housing development must be viewed in the context of the forecast growth across London and Harrow's spatial strategy for managing growth locally over the plan period to 2026. These are set out in the Principle of Development section of this report (above). The proposal's

contribution to housing supply ensures that this previously developed and allocated site makes an appropriate contribution to the borough's housing need over the plan period to 2026 and towards fulfilling the Core Strategy's target for the Edgware and Burnt Oak sub area.

- 6.3.15 Furthermore, the regional policy context (policy H1 of the Publication London Plan) requires boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites with particular focus on sites with existing access levels (PTALs) 3-6 that are located within 800m distance of a station, and redevelopment of car parks and low-density retail parks and supermarkets as a source of capacity.
- 6.3.16 Policy 3.4 of the London Plan (2016) seeks to optimise housing output from development by applying the sustainable residential quality density matrix at Table 3.2 of the Plan. Within the definitions of the London Plan density matrix, the site is considered to have a suburban setting and has a PTAL of 3, indicating a good level of public transport accessibility. When applying the density matrix within the London Plan (table 3.2), the proposal would equate to a density of 185 units per hectare and 544 habitable rooms per hectare. This would evidently exceed the matrix range for suburban setting sites with PTALs of 2-3.
- 6.3.17 However, Paragraph 3.28 of the reasoned justification to Policy 3.4 makes it clear that the density matrix is only the start of planning for housing development and that it should not be applied mechanistically. Further guidance on how the matrix should be applied to proposals is set out in the Mayor's Housing SPG and this indicates that whilst the maximum of the ranges set out in the density matrix should not be taken as a given, reasons for exceeding them should be clearly demonstrated. In this instance the positive attributes of the scheme are considered to provide clear and robust justification for the development to the density proposed. These attributes include; the allocation of the brownfield site in the Local Plan, its sustainable location and current function as a car park, which is specifically identified as a source to increase housing growth capacity, the public benefit attributed to the provision of affordable housing, and the delivery of a high quality scheme.
- 6.3.18 Furthermore, the Publication London Plan (2020) removes the density matrix that was previously included in order to promote a design lead approach rather than the application of a prescriptive matrix. Policy GG2 of the Publication London Plan (2020) notes that higher density development should be promoted, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. The policy goes on to note that the appropriate density of a site should be arrived at through a design-led approach, which is set out in detail under Policy D3 of the draft Plan.
- 6.3.19 The design considerations of the development have been considered in detail within the subsequent sections of the report. As noted in the submitted Design and Access Statement, the application proposal has been the subject of extensive pre-application discussions with the Council and has evolved in response to design scrutiny following Design Review Panels and discussion with



Council Officers. It is considered that the proposed design of the site effectively optimises development on an accessible, brownfield site, whilst responding to the local context. The Publication London Plan (2020) and the approach embedded within the policies to optimise the capacity of sites, are a material planning consideration that hold significant weight.

- 6.3.20 It is acknowledged that some respondents to the application consultation have expressed concern about overdevelopment of the site. For the reasons set out above, and as the density proposed has been achieved using a design-led approach, officers consider that the density of the proposal would be acceptable. Furthermore, any significant reduction in the density of the development could constitute an under-utilisation of the site (in the context of growth), with implications for viability of the development and subsequent delivery of affordable housing.

### Summary

- 6.3.21 The proposed development would bring forward 118 units of housing, all of which would be affordable, and would therefore make a valuable contribution towards the Government's objectives of significantly boosting the supply of housing and meeting the housing needs of all. The absolute number of units and habitable rooms proposed as affordable housing in the application is greatly in excess of the levels across Harrow and London as a whole, with some 17% of units secured across London in the past three years and approximately 21% of units secured within the Harrow.
- 6.3.22 As to the split of tenures, the application would deliver 22 family sized London Affordable Rent units, which is the most affordable of all the tenures and the priority need within the Borough. In terms of the policy requirement provision and tenure split, the London Affordable Rented provision would represent 71% of the required policy compliant offer on a habitable room basis, with the remaining 29% coming forward as Shared Ownership (intermediate housing tenure). The remaining 60% of units would be offered as Shared Ownership units, with affordability aligned to local household incomes and local needs. The proposed affordable housing offer therefore goes beyond the policy requirements of the borough and the Mayor's requirements.
- 6.3.23 The delivery of 118 new affordable-tenure homes (including the additional units above policy requirements) is considered to constitute a public benefit which contributes to the achievement of local policies, the strategic level need for new (affordable) homes for London and the Government's policy objective of boosting significantly the supply of homes.

## 6.4 Townscape, Character, and Design Quality

6.4.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2016): 7.1, 7.3, 7.4, 7.5, 7.6
- The Publication London Plan (2020): D1, D3, D4, D8
- Harrow Core Strategy (2012): CS1B, CS1E
- Harrow Development Management Policies (2013): DM1, DM2,
- Residential Design Guide Supplementary Planning Document (2010)

### Context and Layout

6.4.2 As set out in the site allocation H17, any proposal for the site would need to retain adequate car parking provision to continue to meet the demand generated by commuters and in connection with major events at Wembley Stadium. Further key constraints of the site include the railway embankment which is sited immediately to the west of the application site, the need for a TfL maintenance strip along that boundary, the layout of the development to allow for emergency TfL Crane access to the railway embankment and the adjoining heritage designations to the north of the site. Consideration would also need to be given to any future development of adjacent TfL land to the south of the site (currently occupied by the BEARS Ambulance centre).

6.4.3 The proposed development has been laid out to provide three, seven storey residential buildings that front Donnefield Avenue. The replacement car park spaces would be provided at surface level, partly within an undercroft (of buildings B and C) and towards the north-western part of the site. Furthermore, the proposed site layout would provide active frontages of the ground floor onto Donnefield Avenue that would provide a degree of natural surveillance over the public realm. The layout, in conjunction with the proposed public realm enhancements would frame the approach to Canons Park.

6.4.4 There would be a moderate gap of 9m and 13m between the buildings, while the northern elevation of building C would be set away 9m from the adjoining boundary with Canons Park. This would provide for a communal amenity space between buildings A and B, and to the north of building C. Furthermore, an outline study for the future development of the TfL land to the south of the application site has been included in the Design and Access statement. This satisfactorily demonstrates that the siting of building A would not prejudice any future development on that adjoining site and the delivery of step-free access to the platform could be delivered in the future.

6.4.5 Given the long, linear and tapering site, and the unique edge conditions to the west with the railway embankment, the proposed layout is considered to be appropriate for the site. The final layout, including the vehicular access point into the site, has been carefully considered in relation to the functional requirements of the proposed residential use and car park re-provision, and has been based on recommendations by design experts during the course of the development

process. Officers are therefore satisfied that the proposal would achieve a high standard of development in relation to the layout considerations.

#### Scale, Massing and Design

- 6.4.6 The proposed buildings would have a rectangular form and would be seven storeys in height. In the context of the two and three storey buildings within the proximity of the application site, the proposed development would introduce a development of contrasting scale and height, that would be a notable transition from the existing and prevailing building heights within the locality. As detailed in the townscape assessment below, this would contribute to a perceived change in townscape character from some viewpoints within the locality.
- 6.4.7 However, it is important not to conflate visibility with harm. The proposed residential buildings, although unquestionably larger than the surrounding built form, would nonetheless benefit from a high degree of articulation. Visual relief would be afforded through the gaps between the buildings and the set-back of the front elevation of the seventh floor would help break the mass and reduce the prominence of the scale and bulk of the proposed buildings.
- 6.4.8 Paragraph 129 of the NPPF (2019) details that Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements. In assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels. Policy D4 of the Publication London Plan (2020) supports the use of the design review process to ensure design scrutiny.
- 6.4.9 Three Design Review Panels (DRP's) were convened prior to the submission of the planning application. The purpose of these DRP's was to enable a panel of experts to consider the scheme and to provide officers with their opinion on the design quality of the proposed development. The design of the proposed development has evolved from that conceived during the early stages of the planning process, taking on board recommendations by the DRP and Council Officers. The proposed design has addressed the key considerations raised in the design review comments by;
- Relocating the entrance of the station car park further south, so that it is no longer adjacent to the entrance with Canons Park. This would reduce the dominating effect of vehicles adjacent to the park entrance
  - The provision of deck access to building A
  - Improving articulation of the façade and a more responsive and sympathetic elevation fronting Canons Park
  - Providing of oblique views through the curved, semi-projecting balconies
  - Increasing space between the buildings
  - Activating the ground floor uses
  - Providing a greater threshold from building line to pavement

- Outlining how the land to the south of the site would be integrated in the future phase of development

- 6.4.10 While the proposal would result in a notable transition from the existing two and three storey heights established within the immediate locality, the DRP experts have expressed their comfort with the height and massing distribution of the proposed buildings.
- 6.4.11 In terms of the immediate development context, it is appreciated that 1-20 Canons Park Close has extent planning permission for an additional floor to that building (LPA reference P/1277/20). This would give the central component a four-storey height and the winged projections a 3 storey height. The hipped roof form to the extensions would also increase the massing further. Additionally, 21-40 Canons Park Close has had planning permission previously granted (LPA reference P/2545/05/CFU/3510). While that permission was never implemented, there is no reason to consider that a similar proposal may not also be capable of support. These buildings could also potentially be eligible for a two-storey upward extensions under Part 20, Class A of the (General Permitted Development) (England) Order 2015 which may result in a five-storey central component and four-storey winged component. While the height and massing proposed on the subject site has been assessed on its own merits, it is nonetheless important to recognise that the prevailing 2 and 3 storey buildings heights within Donnefield Avenue could also be subject to change, and should therefore not be determinative or serve as the benchmark for what would be deemed acceptable massing on the application site.
- 6.4.12 It is acknowledged that some recommendations by the Panel could not be fulfilled, such as; the provision of a non-residential use (e.g a café) adjacent to Canons Park, a shared surface treatment for Donnefield Avenue, increased 'doorstep' play, and relocation the cycle hub to the TfL land to the south of the site. However, officers acknowledge that a number of these recommendations were outside the control of the applicant and would also contrast with other material considerations (e.g highway impacts). Notwithstanding this, the DPR Chair Review response acknowledges the efforts to address key issues for the site, which has great potential to work as a true residential cul-de-sac.
- 6.4.13 The proposed scale, massing and design of the development has been informed and conceived through a design-led approach which was subject to design scrutiny as advocated by Policies GG2, D3 and D4 of the Publication London Plan (2020). A key objective of the Local Plan is to ensure that all developments are of a high standard of design and layout. Various experts in the design field have considered the scheme and have not raised any fundamental objections to the massing or design. Officers are mindful of this expert advice and consider that the proposed buildings would respond to the challenging constraints of the site and optimise the site capacity through the design-led approach.

## Architectural Quality and Appearance

- 6.4.14 The proposed buildings, by virtue of their height and siting, would be visible from a number of viewpoints within the locality. The applicant has given considerable thought to the proposed elevational character and architectural detailing with the aspiration to create reposed elevations while using materials which relate to the surrounding residential buildings. Particular attention was also given to the design of the northern elevation of building C, which would address Canons Park. The DRP experts and Council officers felt that the architectural character of this elevation should respond appropriately to the Park and as a result, the park-facing gable was therefore developed to offer a civic elevation. Through its simplicity in form and careful material palette, the elevation would respond sympathetically to its historic setting.
- 6.4.15 A bold, articulated, high-quality masonry palette with complementary brick tones and textures would be accented with limited precast detailing around entrances, sills, lintels and copings. The predominant use of brick would ensure longevity and allow the proposal to sit comfortably in the context.
- 6.4.16 The use of floor-to-ceiling high windows in most elevations and glazed stair wells would help to animate the buildings and give vertical emphasis. The street facing balconies are semi-projecting and separated by a masonry pier. This sets up a regular vertical rhythm to help break the overall massing and provides articulation, whilst offering oblique views towards Canons Park. Window reveals (setting back the window from the outer face of the exterior elevation) is a valuable design feature which further articulates elevations with depth, light and shade, and are proposed as part of the detailed treatment of the buildings. The proposed front elevations are successful with limited rhythm and alignment of façade elements. The proposal would also provide generously spaced and high-quality entrance lobbies for the residential buildings, with rich tiling and terrazzo elements that would enliven the shared spaces.
- 6.4.17 Every indication is that the design and finish of the development would, if approved, be carried out to a high standard. The final choice of materials and the details described are critical to achieving the high-quality finish that has been promised, ensuring that the development exploits this opportunity to reinforce and enhance the positive attributes of the local built environment and is sympathetic to the setting of Canons Park. It is therefore considered that the materials and other detailed aspects of the design, as set out in the Applicant's Design & Access Statement, should be controlled by conditions of planning permission to ensure the development maintains its attractiveness over the lifetime of the development. As a safeguard, it is proposed to include in the section 106 Planning Obligation, to ensure that the quality of the architecture and finish are preserved through all phases of development including delivery on site. This will be achieved through an agreement on the level of architectural expertise retained throughout the construction phase or a design code.

## Townscape and Views

- 6.4.18 Townscape refers to the landscape within the built up area, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces. A Townscape and Visual Appraisal (TVIA) produced by Landscape Visual has been submitted with the application. This uses qualitative and quantitative methods to consider the principal effects of the development on townscape and views found within a 0.3km radius of the application site.
- 6.4.19 In setting out the evolution of the surrounding townscape, the submitted TVIA notes that the townscape of the surrounding area developed in the 1930s around Canons Park underground station, with the suburban residential properties to the south and west of the Site being present on the 1935 OS Map. The two residential blocks opposite the application site were constructed in the early 1960s, while the layout of the car park was extended northwards to the boundary of Canons Park in 1999. The visibility of the Site from the surrounding area is generally limited to the immediate context due to the topography, surrounding buildings and vegetation. The railway embankment screens views from the west and dense tree planting around the north and north-eastern boundaries of the site, screens views to the car park from Canons Park itself.
- 6.4.20 In terms of character areas, Table 4.1 of the TVIA considers their respective quality and value (using the methodology detailed in the report). Canons Park and the Conservation Area are considered to have a medium to high value, while the adjoining TfL land to the south and the retail/commercial parade on Whitchurch Lane are deemed to have a low value. The Metroland housing character areas, such as Howberry Road and Whitchurch lane are considered to have medium to low value.
- 6.4.21 The TVIA considers eight different viewpoints, utilising accurate wirelines and block-rendered visuals to inform the townscape and visual appraisal. The Appraisal notes that at viewpoints 1 and 6 (within the immediate setting looking north and south along Donnefield Avenue) the proposed buildings would be prominent additions to the street. The scheme would therefore contribute to a perceived change in townscape character, reducing the influence of utilitarian townscape elements (the fenced station parking) and increasing the influence of residential apartment buildings of taller scale than existing buildings. Furthermore, the addition of high quality and carefully conceived apartment buildings to the local townscape would be positive and the proposed landscaping measures would improve the public realm.
- 6.4.22 In relation to Canons Park, the TVIA notes that in views from the east of the site (viewpoints 2 and 3), there would be a contrast in scale between the existing and proposed buildings. However, the gaps between the buildings slightly reduce the impact on the skyline views and the views from the east of the site are sufficiently distant from the site for the proposed scale of change to be appropriate within the exiting features in view. From the area to the north of the site, the Park contains denser vegetation and would be noticeable new elements in views to the fringes of the park. In relation to views from the adjacent residential streets (viewpoint 1 and 7), the scale of the proposed buildings would be experienced in the most

channelled views (such as on Watersfield Way facing east), rising between houses or where partial views are visible over the roofs of houses. While this would have a moderate visual effect, the TVA considers that the addition of high quality and carefully conceived buildings to local views would be positive. Overall, the TVIA concludes that the proposal would make a beneficial contribution to the local townscape character and would have a largely positive but sometimes neutral effect on views.

- 6.4.23 The proposed development would not be within a landmark viewing corridor or the wider setting consultation area (as detailed in the Harrow Policies Map). Consequently, the proposed development would not have a harmful impact on the protected views and their landmark elements as set out in the relevant policies. In view of the above evidence and the conclusions reached in respect of a range of related matters elsewhere in this report, it is considered that the proposal would not be detrimental to townscape character.

#### Public Realm

- 6.4.24 The proposal incorporates a comprehensive landscape and public realm strategy, as detailed further in the report. The proposed enhancements would be inclusive, attractive, well-designed and accessible. Furthermore, the aspect of the proposed buildings and provision of residential units on the ground floor of buildings B and C would activate and define the public realm, providing appropriate levels of natural surveillance. The proposed works would provide street trees and soft landscape planting, which would also serve to support sustainable drainage measures and increase biodiversity. Appropriate street furniture is also proposed to improve pedestrian amenity and experience. For these reasons, officers are satisfied that the proposed public realm improvements would meet the objectives of the relevant policies.

#### Lifetime Neighbourhoods and Secure by Design

- 6.4.25 Occupiers of the proposed flats would benefit from close proximity to the shops and services available within the shopping parade on Whitchurch Lane, and those elsewhere, via public transport routes serving Canons Park Station. Furthermore, the proposal would significantly enhance the public realm, thereby improving the pedestrian and cyclist experience as an access route into Canons Park.
- 6.4.26 The Metropolitan Police Secure by Design Officer was consulted during the application and raised concerns with the deep undercrofts that are proposed, which could attract crime and anti-social behaviour if the development is appropriately secured. During the course of the application, the applicant has confirmed that a gate would be provided. This was reviewed by the Secure by Design Officer who has accepted the details could be confirmed through a pre-commencement planning condition. A pre-occupation condition is also attached to ensure the proposal achieved Secure by Design Accreditation.

#### Summary

- 6.4.27 The National Planning Policy Framework reiterates the Government's commitment to good design. However, the NPPF is also clear that local planning authorities should not attempt to impose architectural styles or particular tastes, and emphasises that good design goes beyond the consideration of visual appearance and architecture.
- 6.4.28 Officers acknowledge that several residents have raised an objection to the scale of the development, noting that it would be out of keeping with the suburban character of the locality. Furthermore, responses to the public consultation have also taken issue with the design, architectural treatment, siting and proximity of the building lines to the pedestrian footpath. Officers acknowledge that the proposal would create a change in impacts to the townscape. However, as set out above, it is considered that the proposal would introduce high quality architecture, materials and public realm to the site. The proposal has undergone robust design scrutiny and various experts in the design field, have concluded that the scale and height would not cause detriment to the urban context of the area.
- 6.4.29 As with any planning proposal, the consequential impacts in relation to character and appearance must be weighed in balance against all other relevant material planning considerations, as set out within the report. Overall, officers consider that the proposal has been well considered and would result in a high-quality development that would comply with the relevant policies. Any actual or perceived local adverse impacts on townscape would not outweigh the overall benefits of the proposal.

## **6.5 Heritage Assets**

- 6.5.1 The relevant policies are:
- National Planning Policy Framework (2019)
  - The London Plan (2016): 7.8
  - The Publication London Plan (2020): HC1
  - Harrow Core Strategy (2012): CS1D
  - Harrow Development Management Policies (2013): DM7
  - Stanmore and Edgware Conservation Area Supplementary Planning Document (2013)



6.5.2 The application site is within the setting of Canons Park, which is a Grade II listed Registered Park and Garden. There are a number of designated assets within the park and the closest designated asset is the Grade I listed Church of St Lawrence, approximately 360m east/south-east of the site boundary. The detailed description for Canons Park is provided within the Historic England Database Listing (list number 1001394). Some of the key descriptions are reproduced below:

*Location, Area, Boundaries, Landform, Setting*

*'The registered site comprises c 50ha of formal gardens and parkland surrounded by housing and other suburban development. The avenues running west from the park towards Marsh Lane, across the railway line, and running east along Canons Drive to Edgware High Street, have been retained'*

*Entrances and Approaches*

*'The principal approach to the North London Collegiate School is from Edgware High Street, via an entrance drive known as Canons Drive...There are three other entrances to the public park: one to the south at Whitchurch Lane, one to the south-west at Donnefield Avenue (both mid to late C20), and one to the west at Marsh Lane'*

*Principal Building*

*'the North London Collegiate School, formerly Canons House (listed grade II), stands at the northern end of the park, forming the main focus of the landscape'.*

*Park*

*The southern part of the registered parkland which includes allotment gardens and playing fields has a mid to late C20 functional path layout. Along the eastern park boundary is a woodland walk running through The Spinney, which dates back to Alexander Blackwell's early C18 layout of the park. The remains of the southern parkland such as the raised banks formerly flanking both sides of the avenue running towards the Church of Saint Lawrence, and along the woodland walk through the Spinney, are still visible. The avenue survived into the mid C20 but of the medieval church of Saint Lawrence (listed grade I), situated in the south-east corner of the park, only the west tower remains. The church was rebuilt by John in 1715 and dedicated in 1720, to become the Duke of Chandos' private estate chapel*

*Kitchen Garden*

*Some 70m south of the school, situated in the public park area, is a rectangular walled area. The brick walls (listed grade II) are the remains of the early C18 kitchen garden which formed part of James Brydges' layout for the garden at Canons Park. There are three entrance gates to this walled garden, namely on the north, west, and south sides. Since the early to mid C20 the kitchen garden has been called the George V Memorial Garden*

- 6.5.3 The northern tip of the application site is within the Canons Park Estate Conservation Area (CA). The CA is described within the Conservation Area Appraisal and Management Strategy as follows:

*The Canons Park Estate CA is an outstanding area given its special landscaping, openness, and good architecture. This is because it comprises a large part of the original Canons Park estate including the grade II listed mansion dating back to 1747 and surrounding landscaping. It has interesting histories attached to it, including associations with famous architects. The area includes a high quality formally planned Metroland estate in a largely 'Tudor revival' design and street layout within a green, sylvan setting that incorporates landscape features of the original estate, including two lakes, a historic avenue and abundant greenery. This landscaped setting lends a special soft, informal and in places, particularly along Canons Drive, a soft, verdant ambience. There is a good spacious and tranquil environment created by public and private open spaces and greenery. Similarly, adding to the area's importance is the range of key views towards landmark buildings, architectural qualities and across open greenery with tree avenues and picturesque ponds. It is the delicate balance of the above factors that achieves the area's special character*

- 6.5.4 Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended requires having special regard to the desirability of preserving listed buildings or their settings and special attention being paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

- 6.5.5 In accordance with the requirements set out by Paragraph 189 of the NPPF, a Heritage Statement and Historic Environment Assessment produced by MOLA (Museum of London Archaeology) has been submitted with the application. The application is also accompanied by a Townscape and Visual Appraisal produced by Landscape Visual. The submitted Heritage Statement considers that the existing site makes no contribution to the setting of the Conservation Area or the setting of the listed Park. In relation to the impact of the proposal on the listed Park and CA, the Heritage Statement makes the following points:

- Canons Park Flats (on the eastern side of Donnefield Avenue) will create an existing visual buffer between the park and the proposed development and transition in scale of built form
- The main development within the park (the former Canons Park Mansion) is substantially distanced from the subject site, as are other significant historic structures which make up the park. The setting of King George V Memorial Gardens and the heritage assets comprising the individually listed former Canons Park House buildings (located in the northern extent of Canons Park) will remain secluded, with the proposed development unlikely to have any visibility from these areas.
- The addition of higher scale development on a single edge of the park will not affect the overall ability to appreciate and experience the 'openness' and 'seclusion' of the larger park which extends to the north.

- The upper storey of the proposed development is set back from the building edge and is a lighter colour brickwork to the bulk of the development, which greatly reduces the visibility of the upper storey, which will mitigate the impact of the overall scale of the development
- The proposed building is designed as an overall simple, modern and high-quality form within the wider setting of the Park and the CA. It is a sympathetic design response to its setting.
- The proposed development is considered likely to have a moderate heritage impact on some aspects/views within the park, due to the scale of the proposed development (which is presently openness), but the visibility of the site from the other surrounding areas of the park is generally limited to the immediate context due to the topography, surrounding buildings and vegetation.
- The bulk of the conservation area comprises Canons Park, with the potential heritage impact on the Park outlined above. The group of significant 1930s Metroland residential development to the east of the conservation area will be unaffected by the proposed development as there is no intervisibility between this cohesive residential area and the subject site.

6.5.6 The Conservation Area Appraisal Strategy sets out the ‘key views’ within the Canons Park Estate Conservation Area. In relation to the subject proposal, the potential identified views that might be impacted are the panoramic views towards the site from the east and in southerly views towards the site from the George V Memorial Garden or from the northern portion of the site, where the group of individually listed heritage assets are located. A series of verified views were undertaken and are provided within the Townscape and Visual Assessment. The relevant heritage views are identified as views 2, 3, 5 and 8. The Heritage Assessment provides the following commentary on the verified views:

Views 2 and 3 (from the east of the site and adjacent to the southern entrance along Whitchurch Lane)

The panorama view already comprises a visual buffer of intervening built form and landscape form (in the form of the existing metal fence, hedge and buildings in the distance). The proposed development will be viewed in the backdrop of the existing low-medium scale development on the south western edge of the park only and it is considered that the panorama view from this aspect is not a more significant view of the park. The more significant direct long distance and short distance views to significant assets within the park will be conserved

View 5 (View from Canons Park central amenity parkland area looking towards Donnefield Avenue park entrance/exit)

The proposed development will be visible in the backdrop of existing vegetation and at a distance from this aspect. Further, the design of the northern elevation has been well considered, with sympathetic façade articulation, responsive to the edge of the park. Although the proposed development is visible from this aspect, the development will not impact upon the overall sense and atmosphere of ‘openness and greenery’ across the remainder of the views within the park.

View 8 (View from Canons Park near the walled garden)

The proposed development will not be visible from the George V Memorial Garden or from the northern portion of the park, where the group of individually listed heritage assets are located. The site is too far distanced from this aspect and is screened by intervening landscape and tree coverage. The tranquillity and seclusion of the memorial garden will therefore be unaffected by the proposed development.

- 6.5.7 The Heritage Statement concludes that the proposal would provide a high quality and responsive development to its heritage context. It would be suitably distanced from key buildings, features and elements within the park; whose individual significance and setting would be wholly conserved by the proposed development. Furthermore, the proposed development would be on the edge of Canons Park, which has previously been subject to development and the proposal would therefore be set in a backdrop of intervening built and landscape form and screened by trees. The proposed development would therefore not affect the overall sense of 'openness' and areas of seclusion across the park. While the proposed development will have a minor impact on an identified panorama view (view 2), this view is of a 'lesser significance' in the park as it is previously been impacted by the identified existing fence, hedge and built form. Other more significant direct long and short distance views across the park will be unaffected. The proposed development would also be responsive to the established character of the Conservation Area.
- 6.5.8 For these reasons, the Heritage Statement considers that the proposed development is considered to have 'less than substantial harm' to the setting of Canons Park (and the Canons Park Conservation Area), due to the scale of the proposed development (with the existing car park currently contributing to openness). However, the Heritage Statement considers that the harm is at the lower end of the threshold and outweighed by the significant public benefits of the proposal. This would include the delivery of 118 affordable housing units, the delivery of a cycle hub and high-quality public realm, which would provide a significant enhancement to the approach of the Park from this point and mitigate the level of harm.
- 6.5.9 The application was referred to the Council's Conservation Officer who has reviewed application and supporting documents. The full consultation response is provided in the relevant subsection of the report above. However, the key points raised by the Council's Conservation Officer are as follows:
- The proposed new buildings would be visible in open views from the parkland. It is the feeling of seclusion and openness in the park that provides the conservation area and registered park and garden with a large part of its special character and appearance
  - The proposal would greatly undermine this character given the height proposed and its proximity to these designated heritage assets as well as the large amount of glazing and balconies facing the park. It would also be lit up at night.

- It is noted by the supporting documents that the development would not be visible as far north as the walled garden which is good but it seems it would be evident further south.
- The scale of the effect of the proposed new build in its setting is noted as 'large' in the Townscape Appraisal. The cross section in the Design and Access statement shows the proximity of The Lodge. Building C is too close to be screened and there is no space for 'buffer' planting. It would not be possible to provide meaningful soft landscape to screen or soften the view of the building
- In relation to view 5, the proposed development will be clearly visible from the listed Canons Park and The Lodge and will have a 'large' impact on the overall sense and atmosphere of 'openness and greenery' within the park. View 3 below shows a similar impact on openness, greenery and the present relative sense of isolation from built up surroundings, from this viewpoint in the conservation area and registered park and garden.
- It is only a reduction in height that could alleviate/ remove the harm significantly, particularly to the building nearest the park. This is recommended. However, otherwise amending the design to omit the balconies/reducing glazing facing the park would help, as would reducing the amount of glazing facing it. It is noted that there are public benefits to be weighed up against the harm but this should only enter the weighing up process if the design cannot be amended to avoid the harm but allow for the same benefits.

6.5.10 Historic England, the government's statutory advisers on heritage, were consulted on the application. The consultation response received on 18<sup>th</sup> June 2020 detailed that they did not wish to offer any comments, and suggested the local planning authority to seek the views of their own specialist conservation advisers, as relevant.

6.5.11 The Gardens Trust, in its role as a statutory consultee for proposals affecting a site listed by Historic England on their register of Parks and Gardens, were also consulted on the application. In the consultation response dated 23<sup>rd</sup> June 2020, The Garden Trust raised an objection to the application on the basis that the height and bulk of the development would represent an overdevelopment of the site which would be out of scale with the character of the surrounding area and would cause harm to the views and setting of the Registered Park and likely affect the setting of the Grade I St Lawrence Church. Furthermore, the proposal would alter the skyline and bring extra noise, lighting and road traffic. If the local planning authority was to decide to approve the application, the Garden Trust would hope to see conditions which would benefit the management and upkeep of the registered Park and Garden.

6.5.12 The London Parks & Gardens Trust (affiliated to the Gardens Trust) also raised an objection to the proposed development in the consultation response dated 17<sup>th</sup> June 2020. Again, it was considered that the height and bulk of the proposed buildings would have a harmful impact on the historic character of the park and would be visible from many key locations within the Park. Furthermore, the loss of parking spaces serving the station would throw greater parking pressure on

the surrounding area and potentially impact on the use of the Park. Finally, it was considered that the design of the proposed buildings would be unsympathetic to the surrounding existing architecture and character of the area. The consultation response did consider that the harm could be mitigated greatly by reducing the height and footprint of the buildings.

- 6.5.13 The Conservation Area Advisory Committee (CCAC) have also raised an objection to the proposal. In particular, the CAAC have advised that the proposal would be a major overdevelopment of the site and views out of Canons Park will be dominated in a southerly direction by the seven storey buildings. Easterly views from the most southerly area of the park and the adjacent sports ground (also part of the CA and historical landscape) will be similarly dominated. This will detract from both the character and amenity value of the CA. The CCA also consider that the loss of over public parking spaces and the provision of only four disabled residential parking spaces, will result in massive overspill parking in the locality which may not directly impact on the CA, but will undoubtedly detract from its immediate environment.
- 6.5.14 It is evident from the submitted documents and subsequent heritage consultation responses that there would be no direct harm to the heritage assets. Rather, the identified harm would be from the impact of the development on their significance derived from their setting. Both the submitted Heritage Statement accompanying the application and response from the Council's Conservation Officer consider that the proposal would result in less than substantial harm to the significance of the heritage assets.
- 6.5.15 In assessing the impact on significance, the key consideration is how important the aspect that would be affected (i.e the setting) is to its significance. It is accepted that the significance of Canons Park and the Conservation Area is derived from their historic landscaped character. In relation to the Park, this is exhibited through the grand, spacious, green and tranquil character of the public parks and gardens provide a sense of isolation and openness. The significance of the Canons Park Estate Conservation Area also relates to its good architecture and high quality formally planned Metroland estate, with a soft and verdant ambience. The significance is also reflected through the historical, aesthetic and communal value of the heritage assets.
- 6.5.16 Turning to the actual impacts, change to the setting would be as a result of the development of the existing surface car park, which currently makes a positive contribution to the open setting of Canons Park (by virtue of the absence of development). The proposed development, by reason of its siting, height, bulk and the limited buffer/setting space provided (for planting to screen the development), would be readily visible from within Canons Park and therefore have an impact on the setting.
- 6.5.17 In terms of the panoramic views, from viewpoints 2 and 3, the height and massing of the scheme would draw the eye and be the primary backdrop for the panoramic views looking eastwards from the Park entrance along Whitchurch Lane. However, the views themselves would not be unobstructed, and it is

acknowledged that high fencing, hedges and the existing buildings on the eastern side of Donnefield Avenue would provide a degree of buffer. Consideration must also be given to the extant planning permission to provide an additional floor to nos. 1-21 Canons Park Close, which would serve to provide a greater degree of screening. The proposed development would not obstruct or undermine the prevailing visual experience from the long-range view from the Whitchurch Lane entrance looking northwards and therefore the landscaped setting (and significance) would continue to be appreciated in its current form when looking at the expansive axial route.

- 6.5.18 Unquestionably, the relative size and appearance of the proposed development would make it more pronounced in views towards the application site from the central amenity area within the Park and adjacent to the Donnefield Avenue entrance. While it is expected that some views might be partially buffered by mature trees, the effectiveness of this would be reduced when the trees are not in leaf, and even so, there would still be many sightlines and viewpoints where this the natural buffer would not exist (view 5 being a case in point). The extent of change to the setting would be from the height and massing of the development and the absence of setting space to provide an appropriate buffer thereby making the proposed development visually prominent.
- 6.5.19 The significance attributed to the sense of isolation and tranquillity experienced within the Park would be impaired by reason of the provision of a protruding balcony and glazing with patio door Juliette balconies on the north facing elevation. This would exacerbate the identified impacts on the significance of the Park. For this reason, the applicant has provided revised drawings which have removed the protruding and patio door Juliette balconies on the northern elevation. While the retained windows would still provide a degree of impact, by reason of potential light spill and the expected views/outlook from occupiers of domestic dwellings, the degree of visual intrusion as a result of actual overlooking on balconies would be substantially reduced.
- 6.5.20 View 8 confirms that the proposed development would not be visible from the George V Memorial Garden or from the northern portion of the park, where the group of individually listed heritage assets are located. The site is too far distanced from this aspect and is screened by intervening landscape and tree coverage. A number of key views within this area of the Park, which were identified within the Conservation Area Appraisal Strategy, would therefore not be impacted. The tranquillity and seclusion of the memorial garden will therefore be unaffected by the proposed development.
- 6.5.21 The proposed development would be sited approximately 360m away from the Grade I St Lawrence Church. Again, given the notable separation distance and the extensive mature tree covering which delineates the boundary of the Church, it is considered that the proposed development would have a very limited impact in views from the Church towards the application site. Building A would also be sited to the north of the Church, any potential overlooking at higher levels would be limited to oblique angles. For these reasons, it is considered that the effect of

the proposal on the setting of the Grade I St Lawrence Church would be negligible.

- 6.5.22 Taking these points all into consideration, while it is acknowledged that many key features contributing to the significance of the Park and CA would largely remain, including verdant views from key viewpoints and individually listed heritage assets, the severity of change as a result of the proposed on the setting of the heritage assets (particularly from the open parkland and the zones around the Donnefield Avenue entrance) would be apparent. Overall, it is considered that the proposal would have a harmful effect on the setting setting of the Grade II Canons Park and the Canons Park Estate Conservation Area. The harm is considered to be 'less than substantial' for the purposes of the National Planning Policy Framework.
- 6.5.23 Great weight should be attached to the conservation of the heritage assets, in line with Paragraph 193 of the NPPF. Paragraph 196 of the NPPF states that where a development proposal will lead to 'less than substantial harm' to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. This applies to the effect of proposal both on the significance of the heritage assets, and on the ability to appreciate that significance.
- 6.5.24 It is important at this point to address whether similar benefits could be brought forward on site which avoids harm to the designated heritage assets. The internal and external heritage consultee responses detailed that a reduction in height and the provision of setting space to enable a natural planted buffer to be provided would reduce the level of harm identified. Given that the identified harm relates to the height, scale and siting of the proposed buildings, it would follow that the suggested interventions (i.e reduction in height and more setting space) would successfully serve to reduce the level of harm. While this might be the expected outcome, the key consideration is whether the proposal would still be able to deliver the same public benefits through an alternative scheme.
- 6.5.25 As the proposed development would deliver 100% affordable housing, the application did not require the submission of viability assessment. However, as part of the Affordable Housing Supplementary note, a financial note on the proposed development was provided. This details that the scheme already has constrained viability and the proposed offer is already above the maximum reasonable. It is therefore extremely likely that any reduction in massing would make the scheme unviable. Furthermore, any reductions would be bound to reduce the ability to achieve a comparable volume of accommodation, and may impact upon the number family sized London Affordable Rent Units that could be provided, which are the priority need within the Borough. Given the constraints of the site, it is not likely that re-balancing the massing between the blocks would address the harms identified. For these reasons, in the absence of any evidenced reasonable or viable alternatives that could effectively reduce the harm but provide the same or similar benefits, the weight afforded to the potential of an alternative scheme delivering the same public benefits is limited.



- 6.5.26 The Council have identified that the Grade II Listed 18<sup>th</sup> Century Memorial Garden Walls are in need of repair. In line with the Council's Planning Obligations SPD, officers therefore consider that a financial contribution towards the repair of this heritage asset which lies within the Grade II Listed Canons Park would improve the character and appearance of the Registered Park and Garden, and Canons Park Estate Conservation Area. Subject to securing the financial contribution through a section 106 agreement, officers consider this would constitute a public benefit.
- 6.5.27 Having established the public benefits of the scheme (appraised in detail within the relevant subsections of this report and concisely summarised within the planning balance subsection), it is necessary to return to the balance triggered by NPPF Paragraph 196. It is considered that moderate weight should be given to the harm to the significance of Canons Park grade II Listed Park and Garden, and the Canons Park Conservation Area on account of development within its setting. Weighed against the public benefits of the scheme, officers consider that the NPPF Paragraph 196 balance should weigh in favour of the proposals. This is an important material consideration.

## **6.6 Residential Quality, Amenity and Accessibility**

6.6.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2016): 3.5, 3.6, 3.8, 7.2, 7.6
- The Publication London Plan (2020): D5, D6, D7,
- Harrow Core Strategy (2012): CS1K
- Harrow Development Management Policies (2013): DM1, DM27, DM28
- Mayor of London Housing Supplementary Planning Guidance (2016)
- Mayor of London Achieving An Inclusive Environment Supplementary Planning Guidance (2014)

### Residential Quality of Future Development

#### *Entrances and Shared Circulation*

- 6.6.2 The Mayor's Housing SPG calls for entrances to be visible from the public realm and clearly defined. The residential entrances to the buildings would face the highway. They would be visible from and would help to activate the new public realm within the proposed development.
- 6.6.3 The entrance lobbies to the proposed residential flats would be generously proportioned and in accordance with the Mayors Housing SPG, each building would be served by at least one lift and there would be no more than eight residential units per floor serving the core. The SPG also encourages communal corridors to receive natural light and ventilation where possible. Building A would provide a gallery access to the proposed residential units and thereby allow for the access corridor to be served by natural light and ventilation. The configurations for buildings B and C, however, do not allow for windows to serve the corridors. However, it is noted that the corridors are not excessively long and

are served by a generously sized lobby for each floor. Whilst clearly not ideal, this is not considered to be unacceptable.

#### *Internal Space Standards*

- 6.6.4 The minimum space standards are set out at Table 3.3 of the London Plan (2016) and are reproduced within the Mayor's Housing SPG. The submitted Design and Access Statement details the proposed unit typologies which would be provided within building A and buildings B and C. All of the flats within the proposed development would meet or exceed the London Plan minimum space standards. The development would also achieve the minimum floor to ceiling height of 2.5 metres as required by the Housing SPG. The submitted drawings show that the proposed layouts would make reasonable provision for the accommodation of furniture and flexibility in the arrangement of bedroom furniture.

#### *Daylight, Sunlight and Aspect*

- 6.6.5 The Mayor's Housing SPG seeks to avoid single aspect dwellings where; the dwelling is north facing (defined as being within 45 degrees of north); the dwelling would be exposed to harmful levels of external noise; or the dwelling would contain three or more bedrooms. The definition of a dual aspect dwelling is one with openable windows on two external walls, which may be opposite (i.e. front & back) or around a corner (i.e. front and side) and the SPG calls for developments to maximise the provision of dual aspect dwellings.
- 6.6.6 Building A would not feature any single aspect windows as a gallery access is proposed to the rear, thereby allowing the residential units in the middle of the building to have windows on the west facing elevation. Buildings B and C would each contain 23 units which are single aspect. While the provision of single aspect flats is regrettable, the respective units would all be one bed flats and would not be north facing. Every effort has been made in the design and layout of the proposal to maximise the number of dual aspect flats.
- 6.6.7 An Internal Daylight, Sunlight and Overshadowing Report produced by GIA has been submitted with the application. The report details that 314 of the 367 rooms meet or exceed the levels of Average Daylight Factor (ADF) recommended by the BRE. Of the 53 rooms that fall short, 30 are kitchens, 15 are main living areas and 8 are bedrooms. However, the report identifies that for most of the open-plan units, the units have been designed so that the kitchens are located within the rear, thereby giving priority for good levels of daylight within the living area to the front of the room. Overall, the scheme would deliver well daylit bedrooms, with 95% meeting or exceeding the ADF level suggested. Those bedrooms that just fall short of the recommendation, only do so marginally. Further to good levels of daylight ingress, 90% of the rooms within the development would meet the recommended levels of No-Sky Line (NSL).

- 6.6.8 Turning to the quality of sunlight for the proposed flats, the submitted report assesses all living room windows for Annual Probable Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH). The results show that 84% of the tested living rooms see good levels of both APSH and WPSH. Where the living rooms fall short of the guidance, this is primarily as they are set behind or beneath balconies. The report notes that this is an expected consequence of the provision of balconies as they intercept the sun's rays before they can reach the fenestration.
- 6.6.9 The Council engaged the services of a specialist consultant to provide independent appraisal of the Internal Daylight, Sunlight and Overshadowing Report. The consultant verified that where the rooms do not meet the guidelines for daylight and sunlight, they are generally located behind or beneath recessed balconies or covered walkways (i.e the gallery access to Building A) which hinder the access of daylight. Daylight to rooms that are on the north or south elevations of the buildings is also restricted when 2 buildings face each other. The consultant has advised that overall, the daylight and sunlight provision to the new units is considered good for a development of this size. Where there are transgressions, these should be balanced with the inherent features of the proposed development such as private amenity in the form of balconies, which would be well sunlit themselves.

#### *Privacy*

- 6.6.10 The flank elevations of the proposed buildings would feature primary habitable room windows serving bedrooms and secondary windows serving the communal living areas. The separation distance between the facing flank elevations of buildings A and B would be approximately 13m while the distance afforded between the flank elevations of building B and C would be 9m.
- 6.6.11 Given the density of the subject proposal, which is consistent with the need to make effective use of this brownfield and accessible site, it is considered that the overlooking relationship would not be so severe as to create unacceptable privacy conditions for the future occupiers of the corner flats. Moreover, effort has been made to provide dual-aspect living rooms, which would therefore result in the flank wall windows serving as a secondary source of light and outlook, as opposed to the primary openings. This would serve to further reduce any perceived or actual overlooking relationship between habitable rooms. The relationship between the buildings is therefore considered to be commensurate with the intended character of the higher density proposal and the likely expectations of future occupiers of the development.
- 6.6.12 The station platform for Canons Park Underground Station would be sited approximately 15m to the west of Building A and by virtue of its position on the railway embankment, would be approximately level with the proposed first-floor units. However, as detailed elsewhere in the report, the railway embankment is a designated Site of Importance for Nature Conservation. Therefore, the existing extensive tree and vegetation cover within the adjacent railway embankment would be safeguarded, thereby maintaining the existing natural buffer and

screening in views towards the application site from the railway platform. On this basis, it is considered that the proposal would not have a detrimental impact on the privacy of the future occupiers.

#### *Noise and Vibration*

- 6.6.13 The application is supported by a Noise and Vibration Assessment produced by ACCON. A noise measurement survey was carried out across the site in order to determine the extent to which the proposed development site is currently affected by noise. The primary sources of noise identified were from train movements, activities at the station (e.g such as announcements and train door movements) and from road traffic.
- 6.6.14 In terms of design, building A, the closest building to Canons Park Station, would have a gallery access at the rear. With the exception of unit typology A-01, all the other units would not have windows serving primary habitable rooms (that are single aspect) on the west facing elevation. Although the west facing elevation of buildings B and C would feature balconies, these have been recessed which would minimise noise exposure, and it is intended to provide sound absorptive material in the balcony soffits to minimise reflections of noise and balustrading to screen noise.
- 6.6.15 The submitted Noise and Vibration Assessment details the daytime internal noise levels for most of the proposed flats should be considered to be reasonable when windows are open for ventilation and that appropriate noise levels could be provided for most of the units with the window shut. The Assessment therefore suggests alternative means of ventilation for habitable rooms within windows in the north, west and south facades of the buildings to ensure that windows can be kept closed for the majority of time to ensure target internal noise levels are achieved. With open windows, the noises associated with the station activities are also likely to be intrusive to adjacent residents. For the units within buildings B and C, only unit type BC-06 would be west facing single aspect. As such, these one-bed, two person units would have their sole outlook (and ventilation) from window openings in the west facing elevation. Consequently, these units would not benefit from natural ventilation from other building aspects. Officers acknowledge that these single-aspect units would be particularly vulnerable to increased noise impacts and consider it necessary to include a condition requiring a more detailed assessment including detailed noise mitigation/sound insulation and ventilation measures for all the proposed units.
- 6.6.16 In relation to vibration measurements, the Assessment notes that the proposed development would incorporate building foundations which will resist motion from ground-borne vibration. Following the vibration assessments undertaken, the submitted report considers that no vibration mitigation measures would be required for the proposed development.

6.6.17 The application was referred to the Council's Environmental Health officer who has acknowledged the recommendations within the Assessment for a sound reduction of 24dB(A) to achieve the target internal noise levels with windows closed. Subject to conditions requiring a detailed sound insulation scheme to provide noise mitigation measures, the proposal would be acceptable in this regard.

*Private and Communal Amenity Space*

6.6.18 For private amenity space, the Mayor's Housing SPG requires a minimum of 5m<sup>2</sup> per 1-2 person dwelling and an extra 1m<sup>2</sup> for each additional occupant. This is also reflected in Policy D6 of the Publication London Plan (2020). All of the proposed upper floor flats would be served by a balcony and would meet or exceed the minimum private amenity space requirements. The Pedestrian Level Wind Microclimate Assessment produced by RWDI details that the majority of balcony locations would be suitable for the intended use during the summer season. However, the report considers that the protruding balconies on the south-east and north-east of building A, the north-west and south-west as well as the top south-east corner balcony of building A, and the north-west balconies of building C would be windier than desired. However, the report notes that the results do not take into account the solid balustrade which is proposed. As such, the report notes that the inclusion of this balustrade would be expected to provide sufficient shelter to western balconies such that conditions would be suitable for amenity use, but east facing balconies may still result in less than the desired sitting or standing wind conditions. Officers consider that this could be mitigated through detailed conditions.

6.6.19 In addition to the private balconies, occupiers of the flats would also have access to two communal outdoor space. The 'community garden' would be located between buildings A and B while the 'pocket garden' would be provided to the north of building C, adjacent to Canons Park. These communal areas would supplement the private balconies and would provide a welcome additional component to the amenity afforded to future occupiers of the development.

6.6.20 The proposed communal gardens would be overlooked by the buildings that they serve (by virtue of the windows within the flank elevations) and would be at surface level, thereby being accessible to the future users. The Mayors Housing SPG also states that communal areas should be designed to take advantage of direct sunlight. In this regard the overshadowing effects of the development upon the proposed communal amenity spaces has been examined in the submitted Overshadowing Report produced by GIA. BRE guidance recommends the amenity space to receive more than two hours sunlight on 21<sup>st</sup> March (i.e the Spring Equinox). The submitted assessment finds that 82% of the 'community garden' would experience more than 2 hours of direct sunlight, while 91% of the 'pocket park' would achieve direct sunlight for more than 2 hours. Furthermore, the Pedestrian Level Wind Microclimate Assessment produced by RWDI details that the proposed communal amenity spaces would still be suitable for sitting with isolated areas of strolling and standing conditions during the windiest season.

Taking this into account, and the close proximity of Canons Park, it is considered that the quantity and quality of communal space provided would be acceptable.

### *Children's Play space*

- 6.6.21 The relevant policies require an on-site provision of facilities where a development would result in a net increase in child yield. Applying the GLA Population Yield Calculator, the proposed development is expected to yield a total of 50 under 16's comprising 25 x 0-4 year olds, 18 x 5-10 year olds and 7 x 11-15 year olds. The Council's Planning Obligations SPD, informed by Harrow's PPG 17 Study, sets a quantitative standard of 4 square metres play space per child. Based on the indicative child yield from the development, this would equate to a minimum requirement of 200m<sup>2</sup> of play space.
- 6.6.22 The submitted Landscape and Public Realm Strategy by Townshend Landscape Architects provides details of the proposed play strategy. The report identifies that the proposed development would provide 274m<sup>2</sup> of play provision that would be located within the two communal shared amenity spaces (i.e 'the community park' and 'pocket park'). While there would be scope to provide some children's play space within the communal shared amenity spaces, the submitted Landscape and Public Realm Strategy also notes that the communal amenity spaces are intended to be multifunctional, serving as places to encourage social interaction (through seating) and visual amenity through generous planting. Furthermore, the western end of the proposed shared amenity spaces would be occupied by cycle stores.
- 6.6.23 Given the multipurpose use of the communal amenity spaces, it is unrealistic that the proposed development can be considered to provide the minimum quantum of designated children's play space as required by the relevant policies. The supporting text to policy S4 of the Publication London Plan (2020) details that formal play provision should be well-designed, accessible, inclusive and stimulating. It is also acknowledged that integrating natural environments into play provision is encouraged, while there should be an appropriate provision for different age groups. Off-site provision, including the creation of new facilities or improvements to existing provision, secured by an appropriate financial contribution, may be acceptable where it can be demonstrated that it addresses the needs of the development whilst continuing to meet the needs of existing residents.
- 6.6.24 The designated children's play area within Canons Park is sited approximately 100m to the north of Building C and would therefore be readily accessible from the application site, particularly for older children. In order to quantify the exact provision of play space that would be provided and the necessary form of provision, it is considered prudent to attach a planning condition requiring the submission of a detailed play strategy. A contribution to off-site provision for the resulting shortfall will be secured through a planning obligation.

### Accessibility

- 6.6.25 To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, the London Plan required at least 10% of dwellings to meet Building Regulation requirement M4(3) 'Wheelchair user dwellings'. All other dwellings (i.e the remaining 90%) would need to meet Building Regulations requirement M4(2) 'accessible and adaptable dwellings'.
- 6.6.26 The submitted applications documents confirm that 12 of the proposed units would be in accordance with M4(3) 'Wheelchair user dwellings' and the remaining units would comply with M4(2) 'accessible and adaptable dwellings'. A condition is recommended requiring the internal layout of the buildings and its external spaces to meet these standards. Subject to this condition, officers consider that the proposed development would acceptable in this regard.

### Residential Amenities of adjoining occupiers

- 6.6.27 The application site is located within in a suburban area and as expected, many of the adjacent land uses are residential. The building heights are generally uniform, varying between two and three storeys. The nearest residential properties are as follows:
- Wyel Lodge: Two storey residential dwellinghouse abutting the application site to the north. The north elevation of block C would be sited approximately 9m away from the shared boundary and 17m from the respective flank elevation of that dwellinghouse
  - The End House: Two storey residential dwellinghouse on the north-eastern side of Donnefield Avenue. The front elevation block C would be approximately 20m away from the front elevation of that dwellinghouse.
  - 1-20 and 21-40 Canons Park Close: two and three storey detached block comprising of 20 flats (per block) located opposite the application site. The front projecting elements of the blocks would be located approximately 21m away from the respective front elevations of the buildings, while the recessed central element would be sited approximately 32m away from the respective front elevations.
  - Nos. 2 – 40 (even) Cheyneys Avenue and 46 and 48 Watersfield Way: two-storey residential dwellinghouses located on the western side of the railway embankment. The rear gardens of those dwellinghouses would be sited approximately 45m away from the west facing elevation of the proposed buildings.

### Visual Impact, Outlook and Privacy

- 6.6.28 Undoubtedly, the proposed development would represent a distinctive new addition to the area. It would, by reason of its height, be visible to occupiers of premises over a wide area. However, the impacts would be most pronounced for the occupiers of adjoining sites. The existing surface car park provides an unobstructed view in the outlook of the residential units and dwellinghouses that

surround the application site. In this context, the introduction of development on the site (especially at the scale proposed) would result in a significant change in the outlook and associated amenity benefits currently experienced by the neighbouring residential occupiers. However, being able to see a building is not of itself indicative of visual harm, and it is therefore necessary to consider in greater detail the specific relationships that would result between the proposed buildings and structures and the nearest affected neighbouring properties.

- 6.6.29 The End House and flats of nos. 1-20 & 21-40 Canons Park Close are orientated directly towards the application site. As noted above, the front elevations of the proposed buildings would maintain a separation distance between 20m – 32m from the respective front elevations of those neighbouring properties. Evidently, at seven storeys, the proposed buildings would be large, and would appear as such from the forecourts and front elevations of the respective residential properties. While the view would be softened by the existing shrubs and trees which delineate the front boundaries of those properties, given that a number of trees and shrubs are deciduous, this level of natural screening would not be provided all year round. However, the gaps between the buildings and detailed articulation of the front elevations would positively mitigate the perception of bulk and massing, albeit in a modest way.
- 6.6.30 In terms of privacy and overlooking impacts, it is noted that the Mayor's SPG refers to separation distances of 18-21 metres between facing elevations with habitable rooms as being 'useful yardsticks' for visual privacy. The separation distances would therefore be sufficient to mitigate against any intervisibility between the residential buildings. Whilst recognising that the adjacent occupiers would experience a visual change, taken together with the separation distances described above and having regard to the need to make effective use of this allocated site, officers consider that the resulting visual and privacy impacts would be not be unacceptable.
- 6.6.31 Turning to the impacts on Wyel Lodge, that adjoining property is located to the north of building C and does not have any original windows within the flank elevation. Therefore, the outlook currently experienced by occupiers within that property would only be affected in limited oblique views from the rear elevation towards the application site. In terms of privacy, it is acknowledged that the habitable room windows within the north elevation of building C would be orientated towards the rear garden of Wyel Lodge and could therefore give rise to a perception or actual overlooking of that private amenity space. However, having regard to the need to make effective use of this allocated site in addition to other material considerations, officers consider that on balance, the identified harm to the privacy amenities of the occupiers of Wyel Lodge would be outweighed by other material planning considerations detailed in the report.
- 6.6.32 In terms the adjacent residential dwellinghouses along Cheyney's Avenue and Watersfield Way, the rear gardens of those properties would be sited 45m away from the west facing elevations of the proposed buildings. While the upper storeys of the proposed buildings would be visible from the rear elevations of those respective properties, the intervening railway embankment and siting of



trees on either side (within the SINC), would serve to provide an effective degree of screening. Given the separation distances afforded, it is considered that the proposal would not have a detrimental impact on the visual or privacy amenities of the adjacent occupiers along Cheyneys Avenue and Watersfield Way.

- 6.6.33 The proposed development would, of course, also be visible to residential occupiers and from commercial premises within the wider locality. Given the conclusions about visual impact in relation to residential properties much closer to the application site than those within the wider area, it follows that the visual impact upon occupiers of all other affected properties can be accepted.

#### Daylight and Sunlight Impacts

- 6.6.34 A Daylight and Sunlight report produced by GIA has been submitted with the application. The assessment uses widely-recognised methodology to assess the proposal's impact upon neighbouring property against British Research Establishment (BRE) guidelines. The report considers the three BRE Guidelines methodologies for daylight assessment of neighbouring properties; the Vertical Sky Component (VSC); the No Sky Line (NSL); and the Average Daylight Factor (ADF). It is necessary for both the VSC and NSL to be met for any particular room in order to satisfy the BRE guidelines. For the sunlight assessment, the report uses the Annual Probable Sunlight Hours (APSH) methodology. In accordance with BRE guidelines, only the main rooms (living rooms, dining rooms and kitchens) in neighbouring properties have been considered. Staircases, hallways, bathrooms and toilets have not been considered. The report also provides precedent examples of recent permissions that have been granted by the Council, and the respective daylight and sunlight impacts/relationships of those schemes.
- 6.6.35 The Council engaged the services of a specialist consultant to provide independent appraisal of the applicant's daylight and sunlight assessment. The consultant has endorsed the methodologies employed and adopted a significance criteria to summarise the impacts of the development on the neighbouring residential properties. This applies to VSC where VSC is reduced to less than 27%, to NSL, and to APSH where the APSH is reduced to less than 25% and/or less than 5% in the winter months.

- Reduction of 0% of 20%: negligible impact
- Reduction of 20% to 30%: minor adverse impact
- Reduction of 30% to 40%: moderate adverse impact
- Reduction of more than 40%: major adverse impact

This criteria is considered by reference to the overall impact on an individual dwelling or block of dwellings rather than necessarily related to one window alone. The independent consultant has provided specific comments where necessary in relation to the assessment findings.

#### *1-20 Canons Park Close*

- 6.6.36 The Submitted Daylight and Sunlight report recognises that as the site opposite the building is vacant, the respective residential units experience a high level of daylight and sunlight amenity, which is far in excess of the targets for a suburban area. In terms of daylight impacts (VSL and NSL), the report considers that 21 out of 32 rooms would experience some BRE transgressions (12 which are believed to be living rooms and 9 estimated to be bedrooms). Where there are breaches in VSC, the vast majority of windows in the property above will experience retained values over 20%. The daylight and sunlight report emphasises that the undeveloped nature of the application site and the high existing VSC values mean that any meaningful massing on the site is likely to cause VSC alterations greater than 20%. In terms of sunlight, 3 out of the 32 rooms assessed would not meet the recommended guidelines for ASPH. One living room would experience an alteration in annual sunlight of 27.4% and a further bedroom would experience an alteration of 22.2% (which just breaches the guideline figure of 20%). The third room would only breach the guidelines for winter sunlight, retaining a winter ASPH of 4% (just below the guidance figure of 5%). It is also noted that the respective flats are dual aspect, so will continue to retain high daylight amenity to the rooms which do not face the application site.
- 6.6.37 The Council's Independent Consultant has reviewed the report and considers that the overall impact to 1-20 Canons Park Close to be minor adverse. In terms of VSC, 8 rooms would experience a minor adverse impact and 10 rooms would have a moderate adverse impact. However, the Independent Consultant acknowledged that the property generally benefits from high VSC levels in the existing condition. Therefore, whilst the reduction in the former value results in adverse impacts, the actual retained values are good (with the exception of 3 room), mostly retaining VSC values of 20%-26.9%. For NSL, of the 8 rooms that fall below the recommended guidelines, each room would retain direct sky to between 52.6% and 74.3% of their area. The sunlight impacts to the flats are considered to be negligible.

#### *21-40 Canons Park Close*

- 6.6.38 The daylight and sunlight impacts on nos. 21-40 Canons Park Close would be more acute. Only 2 out of the 32 rooms would achieve BRE compliance for daylight (VSC and NSL). In terms of NSL, 11 out of the 32 rooms would not meet the recommended guidelines. In terms of sunlight, 8 rooms would experience BRE breaches. The submitted daylight and sunlight report acknowledged the transgressions, but again reiterates the high existing VSC values experienced by the occupiers as a result of the absence of development on the application site. Therefore, any meaningful massing on the site, especially for the delivery of the quantum of affordable housing proposed, is likely to cause VSC alterations greater than 20%. The report also considers that each of the flats is dual-aspect. Therefore, while there are isolated instances of low retained daylight values, each flat contains rooms that do not face the site and will continue to retain a high daylight amenity.

- 6.6.39 The Council's Independent Consultant has advised that of the 30 rooms which fall below the daylight guidelines, 10 would experience a minor adverse impact, 17 a moderate adverse impact and 3 a major adverse impact. However, as with 1-20 Canons Park Close, the property benefits from high VSC levels in the existing condition. Therefore, whilst the reduction in former values results in adverse impacts, the retained values are good (24 rooms would achieve retained VSC of 21%-26.9% and 6 rooms between 16.1%-18.9%). For NSL, the 11 rooms would fall below the recommended guidelines, but would still retain direct sky to between 49.1% and 79.2% of their area. In terms of sunlight impacts, 5 rooms would fall short of the annual winter and sun target values, while 3 rooms would fall short of the winter sun target. The Council's Independent consultant considers that the daylight and sunlight impacts to 21-40 Canons Park Close would be moderate adverse.
- 6.6.40 A consultation response on behalf of the freeholder of the site raised concerns at the potential for future development on 21-40 Canons Park Close, by reason of the windows and single aspect units facing the application site. However, given the separation distances involved, officers consider that the provision of single aspect units fronting Donnefield Avenue would not in themselves prejudice any future development of 21-40 Canons Park Close. In any case, each application would need to be assessed on its own merit.

*The End House*

- 6.6.41 The submitted Daylight and Sunlight report considers that all five rooms relevant for assessment would experience BRE breaches in relation to daylight, while two rooms would experience alterations in sunlight beyond the BRE guidelines. The report considers that the breaches are in part due to the depth of the respective rooms and the existing features of the property, whereby the ground floor window in the northern part of the front elevation has an existing overhang, and daylight to that room is already impacted by the existing projections adjacent to it. The report summarises the impacts by acknowledging the changes in daylight beyond BRE guidelines, but considers that this would be inevitable for a development providing such a level of housing on a site that is currently vacant (of buildings). In consideration of the retained daylight levels and in the context of the policies and precedents detailed, the report considers that the daylight and sunlight impacts to the End House would not be detrimental.
- 6.6.42 The Council's Independent Consultant, using the significance criteria, had identified that 2 of the 4 rooms would experience a minor adverse impact, a reception room would experience a moderate adverse impact, and a kitchen/living/dining room would experience a major adverse impact. However, it is acknowledged that daylight for window which experiences the major adverse impact is already vulnerable to daylight impacts given the recess and projecting wings either side, both of which reduce access to daylight. For the two rooms that would not meet the NSL value, the rooms are deep and benefit from high levels of direct sky over the existing underdevelopment site. Therefore, any meaningful massing on the site is likely to cause transgressions. The Council's Independent

Consultant considers the overall impact to this property to be moderate adverse in relation to daylight and negligible in relation to sunlight.

- 6.6.43 A representation was received by the occupiers of the End House which raised an objection to the proposal and included an independent review of the submitted Daylight and Sunlight report by an expert commissioned by the occupiers. The expert review appreciates that the room layouts were not fully understood in the Daylight and Sunlight report. Even so, the expert review notes that the consideration of the resulting impacts as an 'urban setting' is not reflective of the location and that the rooms would still nonetheless experience material transgressions. Furthermore, while it is acknowledged that site circumstances provide a low existing value for one of the ground floor windows, this does not itself justify reducing the VSC levels by more than half. The expert review considers that the building will form a dominant obstruction to light and will have a very real and material impact.
- 6.6.44 Having had the opportunity to review the comments provided with the neighbour representation, the Council's Independent Consultant has acknowledged the validity of some of the points raised in relation to VSC. In particular, the area may be classed as more suburban, but with the exception of 3 windows, all would retain VSCs above 20%. The 3 that are lower than this would experience VSCs of 6.2%, 18.1% and 19.6%. While the lowest value is not really typical of this environment, the other figures are not necessarily poor. The Council's Independent Consultant has acknowledged that the proposal would have a moderate adverse impact in daylight terms.

*Wyel Lodge*

- 6.6.45 The submitted Daylight and Sunlight report did not consider the impacts to this adjoining dwellinghouse. However, further information was provided by GIA during the course of the application which assessed the impacts. As the property does not feature any windows directly facing the application site and as the west facing windows will not experience a view to the proposal, there would be no alteration in daylight to the respective rooms. In terms of overshadowing, the garden would receive more than two hours direct sunlight (during the spring equinox), and would therefore be compliant with the BRE guidelines. Officers are satisfied with the conclusions of the in this regard.

*46 Watersfield Way*

- 6.6.46 When considering daylight distribution, one ground floor window would experience an alteration of 22% in relation to NSL, which is marginally greater than the recommended figure. Given the small isolated breach of BRE guidelines, and in the context of relevant policy and precedents provided, the submitted assessment considers that the daylight and sunlight impacts would not be detriments. The Council's Independent Consultant has concluded that overall, the impact to this property is considered negligible.

*Nos. 2 – 40 (even) Cheyneys Avenue and 46 Watersfield Way*

- 6.6.47 The submitted Daylight and Sunlight report analysis demonstrates that these properties would remain BRE compliant in relation to VSC, NSL and ASPH and therefore no further detailed consideration is necessary. The Council's Independent Consultant has concurred with this conclusion.

*Overshadowing Impact*

- 6.6.48 An overshadowing assessment was undertaken to determine whether the amenity areas surrounding the Site at the following properties achieve adequate levels of sunlight (two or more hours) on the 21st March. Based on the technical analysis, it was found that all amenity areas would achieve BRE compliance in relation to the sun hours on ground assessment. The Council's Independent Consultant confirms that the impact in overshadowing is therefore negligible.

*Overall impact*

- 6.6.49 It is clear from the submitted assessment and the review undertaken by the Council's Independent Consultant, that a number of adjoining properties would see transgressions in the level of daylight and sunlight beyond the BRE guidelines. Officers acknowledge that some rooms would be particularly impacted and would see material changes in the level of daylight and sunlight currently experienced. However, these impacts must be considered against other material considerations. In relation to the site context, it is recognised that the adjacent residential properties currently experience high levels of daylight and sunlight as a result of the absence of built massing within the application site. This accounts for greater reductions in former values as a result of the development, but as affirmed by the Council's Independent Consultant, most of the retained values to rooms are good. While some of the rooms facing the application site may experience notable changes to daylight and sunlight currently experienced, some consideration is also given to the dual-aspect layout of the adjacent residential units. The residential units would therefore continue to retain high daylight amenity to the rooms which do not face the application site.
- 6.6.50 The National Planning Policy (2019) and the relevant policies of the development plan set out the need to make effective use of land in meeting the need for homes. This is particularly significant given the allocation of the application site, the focus on surface car parks and sustainable locations in the optimisation of housing delivery, and the 100% affordable housing output of the proposal (all appraised in detail elsewhere within this report). While a reduction in massing would, in all likelihood, have the consequential effect of reducing the degree of impacts identified, it is not known whether these alternatives would deliver the same quantum of outputs that are to be delivered as part of the subject proposal. Taking the conclusions of the specialist consultant, the extent and degree of daylight and sunlight losses that would occur, the need to balance the efficient use of this allocated site, and the other considerations detailed within the report, it is concluded that the proposal would maintain a high standard of amenity for neighbouring residential occupiers. The limited losses to sunlight and daylight would be outweighed by the other material considerations.

## Proposed use

- 6.6.51 It is acknowledged that some public consultation responses referred to the noise and disturbances that would be associated with the proposed development. Although the proposal would consist of an increased density of housing beyond that which is currently provided within Donnefield Avenue, the residential uses (and resultant noise generation associated with such uses) are considered to be wholly appropriate to the area. As the proposed development would be car free and would reduce the amount of existing commuter car parking, it is likely that the acoustic environment would be improved in this respect. The noise and disturbances during the construction phase would be for a limited period, and the impacts would be mitigated through detailed construction management plans. Officers therefore consider that the proposal would not have a detrimental impact on the residential amenities of adjoining occupiers in this regard.

## **6.7 Transport and Parking**

- 6.7.1 The relevant policies are:
- National Planning Policy Framework (2019)
  - The London Plan (2016): 6.1, 6.3, 6.9, 6.10, 6.11, 6.13
  - The Publication London Plan (2020): T1, T2, T3, T4, T5, T6, T6.1, T7
  - Harrow Core Strategy (2012): CS1R
  - Harrow Development Management Policies (2013): DM42, DM43, DM44, DM45
- 6.7.2 Donnefield Avenue is a local cul-de-sac which has a single entry point off Whitchurch Lane (B461). To the west of the site the B461 merges onto the A5, which is an important connector that links directly into Central London. The application site is occupied by a 162 space car park which is situated approximately 100m north of the Canons Park London Underground Station. The site is highly accessible for pedestrians, with footways provided on all streets. The B461 is also highlighted as a route signed or marked for use by cyclists on mixture of quiet or busier roads. It features a cycle lane incorporated in the western side of the footway, providing access on a north-south trajectory to North Harrow.
- 6.7.3 The application site is site is in close proximity to Canons Park Underground station which provides Jubilee Line services to Central London and Stratford in the south east and Stanmore to the North. Key eastbound destinations include Bond Street, Westminster, Waterloo, London Bridge and Canary Wharf. Edgware London Underground station, served by the Northern Line, is located 1.5km east of the proposed development site. Adjacent to Canons Park Underground Station along Whitchurch Lane are two bus stops. These are served by three bus routes; the 79 (Alperton-Edgware), 340 (Harrow-Edgware) and 186 (Brent Cross-Northwick Park Hospital). The application site is in a PTAL 3 location, representing a moderate level of public transport accessibility.

- 6.7.4 Donnefield Avenue and the surrounding highway network are subject to a Controlled Parking Zone (CPZ). Zone DA along Donnefield Avenue (8am-6.30pm Monday to Saturday) features 33 pay and display bays and one blue-badge permit bay. Whitchurch Lane has a single yellow line restriction (8am-6.30pm Monday to Friday) and provides 69 on-street parking bays. CPZ CS to the west of Canons Park Station features 41 pay and display bays and one blue badge bay (operating 8am-6.30pm Monday to Saturday).
- 6.7.5 The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also contribute to wider sustainability and health objectives. It emphasises the importance of reducing the need to travel and encouraging public transport provision to secure new sustainable patterns of transport use. The London Plan and local plan policies recognise the need for impacts on the transport capacity and network to be fully assessed, but also seek to encourage and facilitate a modal shift to more sustainable methods of transport such as walking, cycling and public transport.
- 6.7.6 The NPPF requires proposals that would generate significant amounts of movement to be supported by a Transport Assessment and to provide a Travel Plan. A Transport Assessment (TA) and Framework Travel Plan produced by WSP, have been submitted in support of the planning application. Further Transport Addendum notes were provided during the course of the planning application in response to comments from the Local Highways Authority.

#### Canons Park Station Car Park

- 6.7.7 The proposal seeks to reduce the capacity of the existing car park from 162 car parking spaces to 60 (equating to a loss of 63% existing capacity). Six of the parking bays will be dedicated to blue badge holders only and overall 6% will feature electric vehicle charging points. The car park is well utilised, and the submitted details show full occupancy on weekdays for the majority of the traditional working day. This point was also emphasised in several public consultation responses.
- 6.7.8 The Transport Assessment includes a study carried out by TfL to profile the car park users. The study showed that 33% of the respondents live within 2km of the station, 45% of the respondents live within 5km of the station and 22% of the respondents come from further away and drive past other rail/underground stations to Canons Park. In terms of alternative modes of travel, 41% of the respondents were willing to switch to a form of sustainable travel to the station, and 22% of users could use alternative routes. The survey therefore deduced that a total of 63% of car park users could travel by alternative routes or switch to sustainable methods of transport to reach the station (walking, cycling, bus).
- 6.7.9 The Council's Highways Authority have acknowledged that the study demonstrates there is a significant number of people currently driving to the station that could potentially travel using a sustainable alternative mode, such as walking, cycling or the bus. In order to facilitate more active modes of travel, such

as cycling, the application proposes a TfL Cycle Hub. The Cycle Hub would be located within the ground floor of Building A and would have capacity for 71 cycle spaces. The provision of the cycle hub is welcomed by the Council's Highways Authority and TfL, and should also be supported by further measures to persuade commuters to cycle. However, to enable modal shift, it would be necessary to provide more than cycle storage; route planning, cycle training and cycle hire may increase the likelihood of people actually making a change. The TA Addendum submitted proposes a Station Travel Plan as one suitable measure to encourage the modal shift. This would establish a set of targets, initiatives, and measures to minimise the number of cars using the station public car park, and promote more sustainable modes of travel including cycling. The Station Travel Plan would be secured through the S106 agreement. A financial contribution £25,000 is also proposed for improvements to the Jubilee Cycle route.

- 6.7.10 As set out in their consultation response, The Transport for London Spatial Planning Team (who are a statutory consultee for major planning applications) strongly support the reduction in commuter parking, and would encourage further reduction where possible. It was considered that this will contribute to the objectives of the Mayor's Transport Strategy, and Publication London Plan, to support mode shift away from car use and promote active travel. Furthermore, the consultation response noted that of the circa 5,000 daily station users, less than 4% use the station car park. Of those who park at the station, a third live within 2km of the station, and 45% within 5km, making walking, cycling and the bus attractive alternatives.
- 6.7.11 The car parking survey results in the TA detail that the existing parking restrictions in the road around Canons Park station seem to be working effectively. While the proposed reduction in capacity would result in a daily am and pm peak hour reduction of 200 two-way car trips, the Council's Highways Authority acknowledge that a reduction in station car parking capacity may lead to overspill parking on street. It is therefore possible that outside the hours of restriction, roads may begin to experience more parking demand and therefore it would be appropriate to monitor the situation with a view to increasing on-street parking controls as necessary. For this reason, the Council's Highway Authority have concluded that a reduction in the public station car parking can be accepted, provided suitable mitigation measures are introduced. This includes a financial contribution for further parking and towards the implementations of any measures should the studies identify specific requirements.
- 6.7.12 A number of public consultation responses identified existing capacity issues on buses, which would not make this a viable alternative to get to the station or the increased capacity arising from the development. The TA includes an impact assessment which considers that the reduction in car parking spaces (and expected increase in bus use to get to the station) is unlikely to affect the bus services capacity. Some consultation responses have also commented on the practicality of cycling in business attire, the cost effectiveness using the underground rather than alternative rail options, the need to provide commuting car parking spaces so people can commute (especially from out of London) and the consequential impact of the loss of parking which will force people to drive



into London. These are valid concerns. The submitted TA details the methodology applied in the quantum of car parking spaces which are to be retained and notes that a number of residents that use the car park do have the ability to utilise sustainable modes of transport to access the site or have viable alternative transport routes into London. It is acknowledged that travel patterns and habits may be affected in the short term, but as evidenced across London, cycling for business purposes has not been a hinderance, and can be a suitable alternative method should the appropriate facilities be provided. The Station Travel Plan would serve to further support the modal shift in addition to improvement that would be made to the Jubilee Cycle Route through S106 financial contributions.

- 6.7.13 Comments to the public consultation also made references to the use of the car park during event days at Wembley and the Hive, for visitors to Canons Park and for activities associated with the adjacent sports clubs/fields. The submitted TA details that Wembley stadium were contacted to ascertain their parking strategy moving forward and confirmed that NCP parking at Canons Park was not part of their formal parking offer in relation to events and is not advertised as such. Furthermore, Wembley stadium operator has confirmed that a new parking strategy 'park and rail' targeting 2,700 spectators coming from the M25 and M40 and a new coach strategy will be operated as needed. The primary use of the station car park is related to commuting for work purposes and its likely that the pay and display bays within Donnefield Avenue primarily support parking associated with the recreational purposes of Canons Park or the adjacent sports clubs. This is also reflected in the fact that the Station car park has a daily rate/charge, whereas the pay and display bays have a charger for every 20 minute stay, with a maximum stay of 4 hours.
- 6.7.14 A number of residents have raised concern about the particular impact on the reduced parking provision to those who are unable to use alternative modes of transport to reach the underground station. Reference has also been made to the preference of using the car park at night rather than using public transport. As noted above, the submitted TA evidences the quantum of station car parking spaces to be retained. Subject to appropriate mitigation measures, this would be supported by the Council's Highways Authority. It is noted from the consultation response that station car parking is well used, and is mostly used for commuting purposes (hence being full in the mornings). Therefore it is likely that the option for parking spaces would be available at night or on weekends (i.e when there is less demand for commuter parking). Officers acknowledge that there will be no access to station car parking during construction. However, a Station Travel Plan will be developed and will include a set of targets, initiatives and measures associated with promoting alternative modes of transport and will be implemented prior to construction beginning on site

#### Residential Car and Cycle Parking Provision

- 6.7.15 For the application site (outer London and PTAL 3), the Publication London Plan (2020) sets a maximum residential parking provision of 0.5 car parking spaces

per unit. The proposal is presented as a 'car free' development, and as such, would only provide blue-badge parking spaces in accordance with the Publication London Plan (2020). This approach is strongly supported by TfL as expressed in their consultation response.

- 6.7.16 The Council's Highways Authority have noted that large scale, car-free developments are usually best suited to high PTAL locations where public transport facilities are excellent and there are multiple conveniences within the immediate or near surroundings. While the supplied study in the TA gives statistical details on the likelihood of people to own cars and travel by car when living in car free developments and looks at the potential for sustainable trips in PTAL 3 locations, this does not mean that people will not own and drive cars regardless.
- 6.7.17 The Highways Authority further consider that there is likely to be a reduction in car ownership in comparison to a development where maximum levels of parking are provided, but not without some residents still keeping cars. Furthermore, the parking surveys supplied indicate that there is on-street capacity in the local area which may actually counteract the car-free intentions as many of the existing parking restrictions do not operate overnight or at the weekend meaning that residents of this development would be able to work around the hours of operation.
- 6.7.18 To provide for occasional vehicle trips for the future residents the consideration is made for one new Car Club to be provided within the development. A planning obligation has been included to commit the applicant to exploring this further and implementing the Car Club if an appropriate operator is found. Furthermore, the submitted TA Addendum confirms that the applicant is agreeable to a planning obligation which would ensure that residents (other than blue-badge holders) of the future development would not be entitled to a residents parking permit or a visitor parking permit. This would serve to further discourage car ownership for future residents.
- 6.7.19 The Highways Authority have concluded that the large-scale proposal combined with a reduction in public car parking may result in overspill on-street parking which would be detrimental to the surrounding highway network without appropriate mitigation. For this reason, it would be necessary to monitor on-street parking in the area surrounding the development before and after occupation to determine whether alterations to the CPZ hours are required. In the TA Addendum, the applicant has committed to undertaking further monitoring before and after occupation (of the residential development), to determine whether amendments to the existing CPZs and on-street parking restrictions are required, to address any potential overspill on-street parking impacts. A cap of £50,000 is also proposed for contributions towards the implementations of any measures should the studies identify specific requirements. The Council's Highways Authority have agreed to this approach.

- 6.7.20 In relation to the proposed cycle parking, the quantum to be provided (222 long stay and 8 short stay spaces) would be in accordance with the Publication London Plan (2020) requirements. The Council's Highways Authority have advised that the location of the 8 short-stay cycle spaces would need to be clarified. It is considered that there would be space within the development to accommodate this, and therefore the details can be secured by condition.

#### Residential Trip Generation and Accessibility

- 6.7.21 The site is within a short walk of a local parade of shops, open space and bus stops. Edgware town centre can be reached by a short bus ride or is within walking and cycling distance for those who wish to travel more actively. Edgware is a busy metropolitan centre with access to Northern line Underground services and a bus station.
- 6.7.22 The proposal includes alterations to the highway in Donnefield Avenue to improve the pedestrian experience leading to Canon's Park. The Council's Highways Authority have advised that while some of the proposed measures look aesthetically pleasing, they are not completely practical for this location. As a result, the raised table adjacent to the entrance of Canons Park and the on-street play equipment have been removed from the proposals. The Highways Authority consider that the proposal would not have a detrimental impact on the safety of the highway network.
- 6.7.23 Being car free, the residential element would generate very few car journeys. Public transport use would increase, however the TA includes an assessment of public transport impact that shows that there is sufficient capacity on buses and tube trains at this location.

#### Delivery, Servicing and Refuse Collection

- 6.7.24 The Delivery and Servicing Plan within the TA details that deliveries and waste collection associated with the residential units on the site will take place via Donnefield Avenue. The forecast trip generation for the proposed units anticipates 13 deliveries per day. The Council's Highways Authority have advised that while this might not be a significant number of journeys, as the road is a cul-de-sac it does mean that these vehicles would have to enter, turn around and exit. These manoeuvres will be in addition to the trips generated by the existing properties along the road and as online commerce increases, the number of delivery trips may also increase too. There is some concern about how this would impact on the pedestrian and cycle environment for Donnefield Avenue. For this reason, the Highways Authority have requested Delivery and Service Plan monitoring to be included alongside the Travel Plan requirements, and a detailed delivery and serving plan to be secured by condition.
- 6.7.25 In relation to residential waste collection, designated bin stores would be provided on the ground floor of each building. The residential waste collection would take place on-street from Donnefield Avenue and the waste collection vehicle would be able to pull up within the widened section of the highway, while

still being within a 10m distance to the waste stores within each building. Vehicle tracking of a waste collection was also undertaken. The application was referred to the Council's Waste Collection team, who have advised that the proposal would be acceptable in this regard.

#### Framework Travel Plan

- 6.7.26 A Framework Travel Plan has been submitted to provide the good practice mechanisms necessary to achieve a modal shift towards a more sustainable mode of travel. The measures would include marketing and promotion of sustainable travel modes and the provision of cycle parking spaces in accordance with London Plan standards. Implementation, monitoring and management of the Travel Plan would be undertaken by an appointed Travel Plan co-ordinator who would work in partnership with the Council and TfL.
- 6.7.27 The application was referred to the Council's Travel Planner who has provided further clarification on the specific detail that should be provided within the Travel Plan and its monitoring. A Full detailed Travel Plan for the residential development will therefore need be submitted post permission and secured via a section 106 Planning Obligation.

#### Construction Logistics Plan

- 6.7.28 Many of the residents within the locality have expressed concerns relating to the impact of the proposed development on the safety and functioning of the local road network. An outline Construction and Logistics Plan has been submitted with the TA which seeks to minimise the impact of construction on the surrounding highway network. Measures to reduce the impact include delivery scheduling, adherence to designated routes, split deliveries, and implementation of a staff travel plan.
- 6.7.29 The outline Construction and Logistics Plan was reviewed by the Council's Highways Authority and is considered to be acceptable. The submission of a detailed Construction and Logistics Plan is required to be provided prior to commencement of the development and is to be secured by a pre-commencement condition.

#### Highway Works and Mitigation

- 6.7.30 The proposed off-site highway works would consist of:
- Highway and pavements re-surfacing
  - Western pavement widening (beyond the current adopted highway line) to provide 2.3m wide pavement
  - Two new highway widenings will be introduced to the eastern side to allow for vehicular passing points and to be used for deliveries and waste collection
  - The new widenings will feature double yellow line and a plate to state 'Loading only'

6.7.31 As detailed above, various strategies are proposed to mitigate the impacts of the proposed development. In addition to the provision of a designated TfL Cycle Hub and the cycle stores for the proposed residential development, a Station Travel Plan and Residential Travel Plan would be secured through a section 106 Planning Obligation. Furthermore, the legal agreement would also secure further studies and a contribution for the implementation of measures (should the need for specific CPZ measures be identified), and a parking permit planning obligation is also required. Officers consider that these measures would serve to better implement the modal shift while ensuring the proposal does not have a detrimental impact on the safety and functioning of the highway.

### Summary

6.7.32 Overall, and subject to the planning conditions and s106 obligations mentioned above, officers consider that the transport impacts of the proposal are acceptable and would accord with the aim and objective of the relevant policies.

## **6.8 Landscape and Ecology**

6.8.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2016): 5.11, 7.19, 7.21
- The Publication London Plan (2020): G6, G7, G8
- Harrow Core Strategy (2012): CS1
- Harrow Development Management Policies (2013): DM20, DM21, DM22

### Landscaping

6.8.2 Donnefield Avenue is a relatively quiet residential cul-de-sac and forms a key link to one of the main entrances to Canons Park. The western side of Donnefield Avenue is dominated by car parking with street parking bays provided along almost the entire length of the road and the pedestrian footpath on the western side of the road towards Canons Park is narrow, with an approximate width of 1.5m for the paving, and a further 1.4m width provided by the grass verge.

6.8.3 A Landscape and Public Realm Strategy produced by Townshend Landscape Architects has been provided with the application and incorporated within the proposed development. The landscape masterplan seeks to provide four key landscape character areas which would help to define public or semi-private areas and their associated characters:

- Social Street: Improvements to Donnefield Avenue which will create social spaces for residents on the street as well as enhancing the approach to Canons Park for visitors
- Park Entrance: playful pocket space adjacent to the Canons Park entrance which forms part of a play trail along Donnefield Avenue.
- Community Garden: A new semi private garden for families to play and socialise

- Planting Buffer: Providing a visual amenity and enhancing biodiversity adjacent to the SINC.

- 6.8.4 The proposals applied in the strategy are in line with TfL's Healthy Streets Guidance and include social spaces provided for through street furniture and seating along Donnefield Avenue, street greening in the form of rain garden planting and defensible space to the ground floor units through appropriate planting.
- 6.8.5 In relation to the 'social street' landscape character area, the Landscape and Public Realm Strategy suggests that the connections to Canons Park will be improved, encouraging people to walk and cycle. Street furniture, tree planting, pedestrian materiality and rain gardens would invite people to use the space and improve safety and comfort. Furthermore, the carriageway width would be visually narrowed using paved surface finishes in the parking bays to slow traffic and improve the environment for pedestrians and cyclists. The Council's Landscape Officer has advised that the proposed planting in the rain gardens would look attractive, if the plants survived and there was a sufficiently intensive management and maintenance plan.
- 6.8.6 It was noted that the play elements for children along embedded alongside the proposed raingardens through natural elements such as boulders and stepping logs was an additional element proposed as part of the social street character area. However, during the course of the application, comments raised by the landscape and highways officers expressed concern at the suitability of this element, given the proximity of the proposed play equipment to the parking bays, and the potential obstructions and subsequent safety implications that could arise. Furthermore, it was considered that the confined space for the planting and they would be easily susceptible to trampling by children. For this reason, the on-street play element has been removed from the landscaping proposals.
- 6.8.7 The second landscape character area within the strategy is the 'Canons Park entrance', which seeks to celebrate the arrival point to Canons Park. The improvements proposed included the provision of a raised table at the of the cul-de-sac and the provision of seating, planting and natural play equipment within the pocket park proposed adjacent to the entrance. Following concerns raised by the Council's Highways Authority during the course of the application, the raised table was omitted from the proposed landscaping proposal.
- 6.8.8 The 'community garden' is the third landscape character area proposed and is intended to provide a social and playful green space for the use of residents. Although the garden is gated from the street, a visual connection would be maintained to provide natural surveillance from the street. As with the pocket park, the Council's Landscape Officer has noted that the spaces within proposed communal gardens will need to work very hard as they are both multifunctional spaces and the various proposed uses are ambitious for the small spaces.

- 6.8.9 As the proposed development is required to reprovide an appropriate level of station car parking and maintain an emergency access route for the TfL Crane, the rear of buildings B and C would be dominated by a surface level car park and hardstanding. Where there would be suitable space for planting, the landscape strategy seeks to provide woodland buffer planting and reinforced wildflower turf, as the fourth landscape character area.
- 6.8.10 It is considered that the proposed Landscape Strategy is appropriate to the proposed development, the constraints of the subject site, and the relationship of the site to its surroundings. The proposal would provide a well defined and enhanced pedestrian route along the western side of Donnefield Avenue to Canons Park and streetside planting areas, street trees, planting within the car park and communal gardens would positively enhance the streetscape and public realm and contribute towards the aspirations of the Mayor's Healthy Streets initiative.. The Council's Landscape Officer has highlighted areas where further information will be required to ensure that the Landscape Strategy's proposals can be effectively realised. It is considered that these matters can be adequately addressed through appropriate landscaping conditions relating to detailed hard and soft landscaping, boundary treatment and a landscape management and maintenance plan. Subject to this, the application would accord with the relevant policies in this regard.

### Trees

- 6.8.11 An Arboricultural Impact Assessment produced by MiddleMarch Environmental has been submitted with the application. The report details that the proposed development has been designed so that, where possible, existing trees are retained. The trees adjacent to the northern boundary of the site are 'protected' by virtue of their siting within the Canons Park Estate Conservation Area.
- 6.8.12 In order to accommodate the proposed development, the report identifies that it will be necessary to remove 2 'C' retention category Ash (T5 and T6) and a 'C' retention category Cypress Leylandii group (G7) which are all assessed as being of low retention value (category C). The trees in question are all located along the eastern perimeter of the site fronting Donnefield Avenue and do serve to naturally screen the application site, particularly along the north end and in views from Canons Park. Clearly, the loss of so many trees is regrettable. However the Report's assessment of their quality demonstrates that they are not of significant amenity value (in relation to their quality/condition) and, therefore, need not be an impediment to the redevelopment of this Local Plan allocated site.
- 6.8.13 It is noted that the proposal would the proposed development would primarily require the installation of new hard surfaces within the Root Protection Areas (PRAs) of retained trees adjacent to the northern and western boundaries of the application site. As the site is already hard-surfaced, the report considers that the potential for harm to occur to the trees as a result of the works is minimal, subject to the adoption of appropriate works methodologies. Mitigation and avoidance measures include the implementation of construction exclusion zones and tree protection barriers.

6.8.14 The proposed site plan and tree planting strategy demonstrates that there is scope for new tree planting within the development. The provision of adequate (in terms of number) and appropriate (in terms of species) tree planting can be secured, by condition of planning permission, as part of the hard and soft landscaping details. It is noted that Catalyst will retain a long-term interest in the site as the Registered Provider managing the residential accommodation and will therefore be responsible for the management and maintenance of the tree planting. In order to ensure the appropriate aftercare and maintenance of the proposed trees, this will be secured through the Landscape Maintenance and Management Plan condition. Subject to the appropriate conditions, the proposal would accord with the relevant policies in this regard.

### Biodiversity

6.8.15 The western and northern boundaries of the site adjoin the Borough Grade II Canon's Park and Stanmore Railway Embankments Site of Importance for Nature Conservation (SINC) which incorporates Canons Park. This provides part of a strategically important Green Corridor connecting part of the chain of important sites at the northern end of the borough with more residential and more heavily urbanised sections. The wider SINC area has some lateral green links to the Borough Grade II SINC's of Stanmore Marsh and Canons Lake and the Basin but the area of the borough south of the site is highly deficient in provision of access to nature and the benefits which this offers.

6.8.16 An Ecological Impact Assessment (EIA) produced by Middlemarch Environmental has been submitted with the application. In relation to the adjacent SINC, the EIA details that in the absence of mitigation, construction activities could result in physical damage or disturbance to the adjacent habitats, through compaction of soils and damage to the roof stock. In addition, there is the potential for this site to be temporarily adversely impacted during the construction phase of the development as a result of a localised increase in air pollutants (e.g nitrogen and dust deposition) from construction traffic and activities. The EIA identifies that these impacts would result in an adverse effect, significant at up to the Local (Borough) level. However, subject to the implementation of suitable protection measures, which can be secured by condition, these adverse impacts can be avoided altogether and therefore no significant residual effect on the SINC is anticipated.

6.8.17 In relation to habitats, the EIA details that the proposed development will result in the permanent loss of small pockets of introduced shrub and tall ruderal vegetation, the narrow linear strip of semi-improved grassland along the western boundary, the poor intact hedgerow along the eastern boundary and the young scattered trees in the southern and eastern parts of the site. Considered individually, the loss of these common, widespread habitats, which are of low ecological value and can easily be replaced, is of negligible significance. However, together, these habitats contribute to the structural diversity of the site and their loss in combination is considered to be an adverse effect, significant at the Local (Site) level. The EIA acknowledges that the loss of these habitats



cannot be avoided or mitigated for, although the creation of ecologically valuable habitats, which have been incorporated into the design of the development, will provide compensation and enhancement to address the residual effect.

- 6.8.18 Turning to the impact on species, the EIA details that the surveys undertaken identified no suitable roosting habitat on site for bats, and therefore there will be no adverse significant effect on the status of any populations of bats utilising the site for roosting purposes. The retention of the vegetation within the adjacent railway embankment will ensure that bats can continue to forage and commute into the wider landscape. The site clearance during the construction phases of the proposed development will result in the loss of scattered trees and hedgerow, which are likely to provide nesting opportunities for a variety of bird species during the breeding season. However, the EIA considers the loss to be temporary as the new buildings and areas of tree and ornamental shrub planting included within the landscaping proposals will provide replacement nesting opportunities for those lost. The report also details that the impact of the development upon any local badger populations, reptiles and hedgehogs that could damage or disturb their habitats, or cause direct harm or injury to the respective species during construction phase would be safeguarded through an appropriate Construction Ecological Plan which can be secured by condition.
- 6.8.19 In relation to the impact of the development on the SINC once complete, the EIA confirms that the railway embankment section of the SINC is not accessible, and therefore is considered unlikely to be subject to any increased recreational pressure from the residential development. Lighting impacts would have to be carefully considered to reduce the residual effect of lighting on bat populations utilising the embankment for foraging and commuting to a level at which it is not significant. Although Canons Park is accessible to the public and is likely to already be subject to reasonably high levels of use, the EIA notes that an increase in human presence within the site could lead to an increase in issues such as trampling or disturbance of sensitive vegetation, accumulation of litter and setting of fires, which could result in the degradation of the habitats for which the site is designated. Subject to the implementation of suitable access management measures, which can be detailed in a Biodiversity Enhancement and Management Plan (BEMP), secured by condition, these impacts can be reduced to a level that is not significant.
- 6.9.20 The EIA also addresses the impact of the operational development on species. Notably, the proposal would result in habitat creation in the form of buffer planting adjacent to the railway which will reduce light spill for bat foraging and commuting features. Furthermore, while badgers and hedgehog might cross the site for foraging and commuting purposes, the operational use of the development will result in less vehicle movements within the site and therefore the risk of road related mortality for badge, hedgehog and nocturnal species is considered to be low. The operational use of the proposed development may lead to the disturbance of habitats used by nesting birds, arising from increased movement and noise from vehicles and people, but will vary in extent depending on the proximity of the next to the areas exposed to disturbance. The proposal could result in the reduction of suitable opportunities for nesting birds within the site.

However, this would be potentially mitigated by the provision of bird and bat boxes within the external fabric of the proposed buildings. As such, no significant residual effect on bird populations is anticipated.

- 6.9.21 The EIA details a range of mitigation, compensation and enhancement measures. This includes the submission of a Construction Ecological Management Plan, to be secured through a condition, which would set out the necessary timings and safe working practices that will be required to minimise disturbance and impacts on habitats and species during the construction phase. A series of habitat creation proposals have been incorporated into the design of the proposed development, providing both compensation and enhancement. The proposals include additional tree planting, herbaceous planting, green roofs, small sections of hedgerow, bat and bird boxes and a habitat structure within the community garden area. These would be implemented through a Biodiversity Enhancement Management Plan and could increase the habitat diversity at the site over the medium to long term, which would have an overall beneficial effect at a local level.
- 6.9.22 The application was referred to the Council's Biodiversity Officer who has noted that some of the impacts have not been adequately evaluated or quantified, particularly in relation to the indirect impacts on the adjoining SINC site and role of the green corridor of which it forms part. Furthermore, there is a lack of detail in relation to the landscaping and biodiversity/mitigation measures and there are some discrepancies between the information provided by the various supporting documents. Notwithstanding this, it will be important to ensure that the biodiversity enhancements to be incorporated within the design will be likely to be successful and appropriate to the context of the site, adding value to the adjoining SINC areas and their linking role and the indirect impacts on the SINC are quantified, and mitigated, and additional measures undertaken either within the railside area or other sections so that any scheme that is permitted will result in net gains for the SINC and the species which are dependent on it.
- 6.9.23 The Council's Biodiversity Officer considers that the required information could be appropriately addressed through planning conditions and planning obligations to ensure that the proposed measures are consistent with the expectations of the relevant policies which seek to protect biodiversity and access to nature, enhance green infrastructure, and provide net gain for biodiversity.

## 6.9 Climate Change and the Environment

6.9.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2016): 5.1, 5.2, 5.3, 5.4, 5.5, 5.6, 5.7, 5.12, 5.13, 5.15, 5.18, 5.21, 7.14, 7.15
- The Publication London Plan (2020): GG6, D14, SI1, SI2, SI3, SI4, SI5, SI12, SI13
- Harrow Core Strategy (2012): CS1T, CS1U, CS1W, CS1X
- Harrow Development Management Policies (2013): DM9, DM10, DM12, DM13, DM14, DM15

### Flood Risk and Sustainable Drainage

6.9.2 The application site is located within Environment Agency Flood Zone 1 and is therefore at low risk of flooding from watercourses. The West London Strategic Flood Risk Assessment (SFRA) shows that the north-western tip of the application site is also within Surface Water Flood Zone 3a. The application is supported by a Flood Risk and Sustainable Drainage Report prepared by Price & Myers.

6.9.3 In relation to Flood Risk, the submitted report details that the site's topography shows there is a flat area at the northwest corner of the site where surface water will pond in extreme storm events. The proposed levels will be set to direct surface water to the proposed drainage system and discourage local ponding. New surface water drainage will be installed for the proposed development that will be able to accommodate the 1 in 100 plus climate change storm event and the system will restrict surface water to 5 l/s per hectare. The car park currently discharges unrestricted flows to the public sewers, therefore the development proposals will significantly reduce surface water flood risk and overland flows.

6.9.4 With regard to utilising sustainable urban drainage systems, it is proposed to attenuate surface water runoff using permeable paving, blue roofs, a tree pit and 2 underground cellular attenuation tanks. An indicative surface water maintenance strategy has also been provided to ensure successful implementation of the sustainable urban drainage systems.

6.9.5 The application was referred to the Council's Drainage Team have advised that the information provided within the Flood Risk and Sustainable Drainage Report is satisfactory. The proposed drainage strategy will need to be reviewed at the detailed design stage and at the recommendation of the Council's Drainage Team, it the details of surface water attenuation and disposal can be controlled by conditions. It has also been recommended that details of the foul water disposal system and permeable paving be controlled by condition. Through such controls it will be possible for the Council to ensure that separate surface water and foul water drainage systems are implemented, reducing the risk of foul water flooding and water contamination. Subject to conditions, the proposal would accord with the relevant policies in this regard.

## Carbon Dioxide Emissions Reductions

- 6.9.6 The overarching target for development in the Publication London Plan (2020) is for major developments to be net 'zero-carbon', with this preferably achieved on site. A minimum on-site reduction of at least 35 percent beyond Building Regulations is required for major development. Where it is clearly demonstrated that the zero-carbon cannot target cannot be fully achieved on-site, any shortfalls should be provided through a cash in lieu contrition to the Council to undertake carbon emissions reductions elsewhere in the borough. The policy seeks to reduce reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy of 'be lean; be clean; be green; and be seen'.
- 6.9.7 An Energy Assessment prepared by Couch Perry Wilkes has been submitted with this application. The energy strategy details a range of methods, relative to the London Plan energy hierarchy, that would achieve an overall on-site carbon reductions of 48%, which is in excess of the Minimum 35% required in the London Plan.
- 6.9.8 With regard to using less energy ('be lean'), the Energy Assessment attributes residential CO<sub>2</sub> savings of 22% from measures that would reduce energy demand on the site. The energy demand minimisation would be through effective building form and orientation, good envelope design, proficient use of services, efficient ventilation systems, high performance lighting and efficient communal heating and hot water systems.
- 6.9.9 The 'be clean' (supplying energy more efficiently) measures, the Energy Strategy details that there are no existing or potential future district heating networks planned in the area of the proposed development and therefore no proposal is made for connection to a decentralised energy network. In this particular instance (having regard to the specific development, site and location), the omission of a district energy network plant room is considered acceptable given that there is relatively low likelihood of a wider district heat network coming forward in the foreseeable future and the potential impact that such plant room provision would have on the footprint and bulk of the development (with potential for further impact other material planning considerations).
- 6.9.10 The remaining 26% residential CO<sub>2</sub> savings would come from the 'be green' (renewable energy) stage of the energy hierarchy. This would be achieved through the provision of an Air Source Heat Pump (ASHP). The 26% savings from the ASHP are based on a conservative assumption that high temperature ASHPs will be used; subject to planning permission being granted and more detailed assessment, alternative ambient temperature pumps maybe used instead, with greater carbon savings. Notwithstanding this, a pre-commencement condition will need to be applied to any permission requiring the submission of a revised energy strategy that takes into account the more detailed assessment / design of the proposed ASHP system. A pre-commencement condition is considered necessary as the detailed design of the ASHP will influence the

detailed design of the rest of the scheme, including potentially at foundations / lower level stages.

- 6.9.11 As the development would not be able to achieve the 'zero carbon' requirement on site, the remaining 52% (65 tonnes) of carbon would be offset at the current GLA rate of £1,800 per tonne (£60 per tonne / year x 30 years), equating to a contribution of circa £117,000 (note: once the publication version of the London Plan is finally published, a higher rate will apply). Subject to appropriate conditions and the necessary planning obligations, the proposal is considered to be acceptable in this regard.

#### Sustainable Design and Construction

- 6.9.12 As detailed in the preceding sub-section, the proposal would achieve the target for CO<sub>2</sub> emissions reductions through on-site methods in conjunction with a carbon off-set contribution.
- 6.9.13 With regards to overheating and cooling, an Outline Modelling Overheating Analysis undertaken by Couch Perry Wilkes has been submitted with the application. As part of the proposed development, in order to reduce overheating and reliance on active cooling systems, several detailed passive design measures have been considered. This includes high performance fabric and facades, green areas, thermal mass specifications, energy efficient lighting and appliances, mechanical ventilation and through the layout of the proposed development, with occupied rooms being generally east or west facing.
- 6.9.14 The results of the Overheating Analysis demonstrate that the proposed scheme would comply with the relevant criteria using DSY1 weather data. However, it is noted that during more extreme weather scenarios, the temperatures experienced within the flats do not demonstrate compliance. It is therefore considered that further passive measures should be considered in accordance with the relevant policies, to avoid the risk of overheating now and in the future climate. To ensure the highest possible levels of comfort to future residential occupiers without the need for mechanical cooling systems (i.e. air conditioning), it is considered that an assessment of the potential for overheating to all flats within the development should be carried out and that detailed measures to sustainably mitigate conditions within those particular flats where overheating would occur should be required, as a condition of any planning permission.
- 6.9.15 The proposed waste and recycling arrangements arising from the proposed development are dealt with in a separate section of this report. It is considered that the design and layout of the proposal would ensure that future occupiers of the development contribute to the Borough's good record in managing down the amount of waste sent to landfill and improving rates of recycling.
- 6.9.16 The submitted Sustainability Statement by CBRE details that the construction phase sustainability will be managed through a robust Construction Environmental Management Plan, which has been provided with the application.

This would allow for the efficient handling of construction, excavation and demolition waste from the site.

- 6.9.17 In relation to Green Infrastructure, local biodiversity would be improved by selecting native species to enhance ecological value. The development would also seek to minimise water consumption with the residential units designed to achieve the consumption target of 110l/p/d or less as set out in Building Regulations Part G.

#### Decentralised and Renewable Energy

- 6.9.18 The London Plan applies a hierarchy to the selection of appropriate energy systems for major development proposals, while the Development Management Policies Local Plan Document supports decentralised energy networks and seeks connection to existing systems where feasible. As detailed within the Carbon Dioxide Emissions Reduction subsection above, the omission of a district energy network plant room is considered acceptable in this instance. The proposed site wide ASHP is therefore consistent with the next preference (for site-wide networks) of the hierarchy. As there are no adjacent allocated development sites, nor any adjacent sites currently being promoted for redevelopment, it is not considered necessary to build-in facilities to extend the network beyond the site boundary.

#### Air Quality

- 6.9.19 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>). An Air Quality Assessment (AQA) by ACCON UK has been submitted with the application.
- 6.9.20 In relation to the operational impact assessment, it is noted that there will be a reduction in station car parking spaces from 162 commuter car parking spaces to 60 spaces and the proposed development would be car free. The AQA details that the proposed development will not have an impact on local traffic flows and air quality because any traffic generated to and from the development will be offset by the overall reduction in station car parking movements. The AQA modelling also predicts that there will be no exceedances of the nitrogen dioxide or particulate matter objectives at the sensitive development receptors on the site, and therefore it is not deemed necessary to include any mitigation measures for the proposed development.
- 6.9.21 Therefore, in terms of the site and its immediate surroundings, the proposal would not increase exposure to poor air quality and measures to address localised or on-site air quality at operation phase are not necessary. With regards to the air quality implications of the development during the construction phase, it is considered that the submission for an Air Quality and Dust Management Plan be in place during construction, which can be secured as a condition of planning permission.

## Contaminated Land

- 6.9.22 A Ground Investigation Report produced by Geotechnical & Environmental Associates Limited has been submitted with the application. In relation to Soil Contamination, eight samples of shallow soil were tested for a range of contaminants. Asbestos fibres were identified in addition to lead and hydrocarbon contamination. The report recommends further sampling and testing to determine the extent of the contamination encountered, particularly in areas of proposed landscaping.
- 6.9.23 The Council's Environmental Health Officer has recommended further site investigations, a written method statement providing details of the remediation scheme and a watching brief strategy during groundworks for unexpected contamination which can be secured by condition. Subject to this, the proposal would be acceptable in this regard.

## **6.10 Planning Obligations and Infrastructure**

- 6.10.1 The relevant policies are:
- National Planning Policy Framework (2019)
  - The London Plan (2016): 8.2
  - The Publication London Plan (2020): D2, DF11
  - Harrow Core Strategy (2012): CS1Z
  - Harrow Development Management Policies (2013): DM50
  - Planning Obligations and Affordable Housing Supplementary Planning Document (2013)
- 6.10.2 Residents have raised legitimate concerns about the impact of the proposed development on local infrastructure and services. Particular emphasis has been placed on the current pressure on health facilities, schooling public services. The Harrow Community Infrastructure Levy (CIL) was introduced on 16 September 2013. The Council is committed to using CIL revenues and other funding sources to help deliver social, economic and environmental infrastructure to support and meet the demands arising from development. The CIL receipts are not tied to a specific site, and therefore CIL receipts can be utilised from developments across the borough to address areas with the highest need for additional infrastructure. It is also important to note that CIL is only a modest element of the broader infrastructure funding pot, with schools predominately funded by the Education and Skills Funding Agency (ESFA) and GP clinics by the NHS (as examples) where there is a demonstrable demand.
- 6.10.3 Furthermore, the proposal may in part address issues of overcrowding in existing households in Harrow, as well as 'concealed' households (i.e. adult children still living with their parents but seeking to move out, subject to being able to afford to do so). Therefore, not all future residents of the development will be new residents to the borough that would require additional infrastructure provision. Nevertheless, if additional capacity to social infrastructure was deemed necessary in the future, this would be addressed through the appropriate services utilising the necessary funding streams.

- 6.10.4 Pursuant to the consideration within the previous sections of this report, and in line with the policies detailed, Officers do however propose to secure a number of planning obligations required to appropriately mitigate the impact of the proposed development. Additional commentary is provided below to inform the proposed detailed drafting of a section 106 legal agreement;

#### Affordable Housing

- 6.10.5 A planning obligation is recommended to secure the affordable housing mix and tenure as submitted and the provision of 2 x wheelchair adapted affordable rent units. Furthermore, as detailed in the report, the weight affordable to the housing output proposed, is in part, due to the consideration that the proposed shared ownership units would represent a genuinely affordable housing option for residents in Harrow. In order to ensure this remains the case, a cascade mechanism is proposed which provides priority bands and an income cap.
- 6.10.6 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. The proposed Shared Ownership units would be marketed to these eligible purchasers for no less than 3 months. Following the expiry of the relevant period, Priority Band 2 would be for those prospective purchasers whose primary place of residence at the date of purchasing the Shared Ownership Unit is within London Boroughs of Harrow, Hounslow, Ealing, Brent, and Hillingdon. The proposed Shared Ownership units would again be marketed to these eligible purchasers for a further period of no less than 3 months. Following the expiry of this period, the marketing would be for all eligible purchasers. An income cap sets out the maximum gross annual household income for the respective Shared Ownership dwelling mixes.

#### Transport and Highways

- 6.10.7 As detailed within the report, the Council's Highways Authority consider the reduction in station parking and the proposed car free proposal of the proposed residential development to be acceptable, provided suitable mitigation measures are introduced. A financial contribution would be provided for the additional parking surveys (to be carried out prior to occupation and post occupation of the 100<sup>th</sup> flat) and implementation of specific CPZ measures should specified measures be identified. The financial contribution shall be capped at £50,000. A planning obligation would also be included to ensure the development would be 'resident permit restricted' and that all marketing/advertising material makes reference to the fact that future owners, occupiers and tenants (other than those registered disabled) will not be entitled to apply for a resident parking permits or a visitor parking permit. All sales and lettings agreements would also contain a covenant to the effect. The submitted Transport Assessment makes reference to the provision of a car club space being secured for the benefit of the future residents. An obligation is therefore included to commit that the developer to investigate and if appropriate, make reasonable endeavours to implement a car club scheme at the site throughout the life of the development.



- 6.10.8 A Framework Travel plan was submitted with the application. In order to deliver the car free aspirations, a revised Residential Travel Plan to be submitted to the Council prior to the first occupation of the building. A travel plan bond (to be agreed with the Council) will be required to secure the implementation of all measures specified in the revised Travel Plan. The developer to ensure the effective implementation, monitoring and management of the travel plan for the site. During the course of the application, at the request of the Councils Highways Authority, the applicant also confirmed their agreement to include a Station Travel Plan. Like the Residential travel plan, a detailed Station Travel Plan would be submitted to the Council prior to commencement of development.
- 6.10.9 A number of alterations are proposed to Donnefield Avenue. In order to facilitate these works, the developer would be required to enter into a Section 278 agreement. A financial contribution of £25,000 will be secured for improvements to the Jubilee Cycle Network.

#### Children and Young People's Play Space

- 6.10.10 As noted in the report, the proposed development would fail to provide the appropriate quantum of designated Children's Play Space. However, given the proximity to exceptional play opportunities provided within Canons Park, the planning benefits of the scheme delivering 100% affordable housing, and the scope to provide some designated play space for smaller children within the communal amenity spaces, officers consider that a financial contribution to fund off-site provision of play space and equipment for the shortfall would be acceptable in this instance. The exact contribution will be determined following submission of an appropriate play strategy (to be secured by condition), which would detail the exact quantum of children's play space that would be provided within the development.

#### Heritage

- 6.10.11 A financial contribution of £10,000 for the repair of the Grade II Listed 18<sup>th</sup> Century Memorial Garden Walls within Canons Park. Officers consider that the financial contribution towards the repair of this heritage asset which lies within the Grade II Listed Canons Park, would improve the character and appearance of the Registered Park and Garden, and Canons Park Estate Conservation Area and would constitute a public benefit.

#### Biodiversity

- 6.10.12 The submission of a Biodiversity Enhancement Management Plan to accurately determine the impact of the development and identify mitigation and net gains, including calculation of any monetary contributions for offsite works. If offsite works are required, this would be secured through a financial contribution.

### Carbon Offset

- 6.10.13 A financial contribution prior to commencement of the development for the shortfall in on-site carbon reductions required to achieve net zero carbon in line with the GLA rates. As noted in the relevant subsection within the report, the submitted Energy Strategy details that 65 tonnes of carbon would need to be offset to achieve the 'zero carbon' requirement on site. This would be offset at the current GLA rate of £1,800 per tonne (£60 per tonne / year x 30 years), equating to a contribution of circa £117,000 (note: once the publication version of the London Plan is finally published, a higher rate will apply). The exact amount payable will be dependent on the submission of a detailed revised energy strategy which is to be secured as a pre-commencement condition.

### Design Review and Design Code

- 6.10.14 An undertaking by the developer to 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

### Employment and Training

- 6.10.15 In accordance with the Council's Planning Obligations SPD, the Council's Economic Development team have requested that the developer provide a Training and Recruitment Plan and use all reasonable endeavours to secure the use of local suppliers and apprentices during the construction of the development. Furthermore, a financial contribution is required to fund monitoring and implementation of the plan. Such provisions are considered necessary to optimise the local economic benefits of the construction phase of the development. It is therefore recommended that appropriate provisions be made as part of a Planning Obligation.

### Legal costs, administration and monitoring

- 6.10.16 A financial contribution (to be agreed) to be paid by the developer to the Council to reimburse the Council's legal costs associated with the preparation of the planning obligation and a further (to be agreed) to be paid to reimburse the Council's administrative costs associated with monitoring compliance with the obligation terms.

## **7.0 PLANNING BALANCE AND REASONS FOR APPROVAL**

- 7.1 The statutory position is that planning applications have to be determined in accordance with the development plan unless material considerations indicate otherwise. The relevant policies have been set out within the report above.
- 7.2 The proposed development would make efficient use of brownfield land in a sustainable location and would bring forward housing and retain an appropriate quantum of commuter parking in conformity with the site's allocation in the Local Plan. The proposal would therefore accord with the spatial strategy for growth as set out in the development plan. This carries significant weight.
- 7.3 The delivery of 118 new affordable-tenure homes is considered to constitute a public benefit which contributes to the achievement of local policies, the strategic level need for new (affordable) homes for London and the Government's policy objective of boosting significantly the supply of homes. This is decisive given the acute and widely recognised need for more affordable-tenure homes in London. The 22 family-sized Affordable Rent units would meet the priority need within the Borough and 96 the Shared Ownership units would represent a genuinely affordable option for residents in Harrow. Officers consider that this should be afforded moderate weight.
- 7.4 Subject to appropriate conditions and planning obligations, the proposal would enhance biodiversity, provide landscaping and public realm improvements, appropriately address surface water flood risk, improve drainage measures, and contribute towards sustainable patterns of travel and healthy streets. These are all given moderate weight. Reasonable weight is afforded to economic benefits that would arise from the provision of employment opportunities during the construction phase and the spending power from 118 new households within the local area. Taken a whole, these benefits range from moderate to significant in magnitude and can all be regarded as public benefits of the proposal.
- 7.5 Weighing against the proposal, is the 'less than substantial harm' to the settings of the Canons Park, a grade II listed Historic Park and Garden, and the Canons Park Estate Conservation Area. Having special regard to the desirability of preserving listed buildings and their setting in line with Section 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, and paragraph 193 of the NPPF, officers consider that the public benefits of the proposal would provide clear and convincing justification and are collectively sufficient to outbalance the identified 'less than substantial' harm to the significance of the heritage assets. The balancing exercise under paragraph 196 of the Framework is therefore favourable to the proposal. This is an important material consideration.
- 7.6 The proposal would result in a reduction in the levels of daylight and sunlight to some of the adjacent properties beyond BRE guidelines. Furthermore, a limited number of proposed single-aspect units facing the railway may be exposed to unsatisfactory levels of noise. These factors weigh against the proposal.

- 7.7 The proposed development has been conceived through an extensive design-led approach and has undergone robust design scrutiny. The proposal would be of a high-quality design and appearance. However, the positive aspects of the design would be partly diminished by the shortcomings with regard to daylight and sunlight impacts, noise and heritage in particular. The quality of the design would therefore be broadly neutral in the planning balance.
- 7.8 For all these reasons, the material considerations and benefits in favour of the proposal would outweigh the harm. In accordance with the NPPF, including its presumption in favour of sustainable development, officers recommend that the planning application should be approved, and planning permission granted, subject to the section 106 Planning Obligations and schedule of conditions.

## **APPENDIX 1: Conditions and Informatives**

### **Conditions**

#### 1. Timing

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

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

#### 2. Approved Plans and Documents

Save where varied by other planning conditions comprising this planning permission or unless otherwise agreed in writing by the local planning authority, the development hereby permitted shall be carried out in accordance with the following approved plans to show the redevelopment of existing public car park to provide new residential accommodation (Use Class C3) of 118 units across three 7 storey buildings. Provision of a TfL Cycle Hub (Use Class Sui Generis), and the re-provision of a 60 space public car park and four residential wheelchair accessible parking spaces together with associated access, cycle parking, public realm works and landscaping

Plan numbers:

446-KCA-XX-XX-DR-A-0100-P, 446-KCA-XX-XX-DR-A-0101-P, 446-KCA-XX-XX-DR-A-0102-P, 446-KCA-XX-XX-DR-A-8000-P Rev 01, 446-KCA-XX-XX-DR-A-8004-P Rev 01, 446-KCA-XX-XX-DR-A-1000-P, 446-KCA-XX-01-DR-A-1001-P, 446-KCA-XX-02-DR-A-1002-P, 446-KCA-XX-03-DR-A-1003-P, 446-KCA-XX-04-DR-A-1004-P, 446-KCA-XX-05-DR-A-1005-P, 446-KCA-XX-06-DR-A-1006-P Rev 01, 446-KCA-XX-07-DR-A-1007-P Rev 01, 446-KCA-XX-XX-DR-A-2000-P, 446-KCA-XX-XX-DR-A-2001-P Rev 01, 446-KCA-XX-XX-DR-A-3000-P Rev 01, 446-KCA-AX-00-DR-A-1100-P, 446-KCA-AX-01-DR-A-1101-P, 446-KCA-AX-02-DR-A-1102-P, 446-KCA-AX-03-DR-A-1103-P, 446-KCA-AX-04-DR-A-1104-P, 446-KCA-AX-05-DR-A-1105-P, 446-KCA-AX-06-DR-A-1106-P, 446-KCA-AX-07-DR-A-1107-P, 446-KCA-AX-XX-DR-A-2100-P, 446-KCA-AX-XX-DR-A-2101-P, 446-KCA-AX-XX-DR-A-3100-P, 446-KCA-AX-XX-DR-A-3101-P, 446-KCA-AX-XX-DR-A-3102-P, 446-KCA-AX-XX-DR-A-4001-P, 446-KCA-AX-XX-DR-A-4002-P, 446-KCA-AX-XX-DR-A-4101-P, 446-KCA-AX-XX-DR-A-4102-P, 446-KCA-AX-XX-DR-A-4103-P, 446-KCA-AX-XX-DR-A-4104-P, 446-KCA-BX-00-DR-A-1100-P, 446-KCA-BX-01-DR-A-1101-P, 446-KCA-BX-02-DR-A-1102-P, 446-KCA-BX-03-DR-A-1103-P, 446-KCA-BX-04-DR-A-1104-P, 446-KCA-BX-05-DR-A-1105-P, 446-KCA-BX-06-DR-A-1106-P, 446-KCA-BX-07-DR-A-1107-P, 446-KCA-BX,XX-DR-A-2100-P, 446-KCA-BX-XX-DR-A-2101-P, 446-KCA-BX-XX-DR-A-3100-P, 446-KCA-BX-XX-DR-A-3101-P, 446-KCA-BX-XX-DR-A-3102-P, 446-KCA-BX-XX-DR-A-4001-P, 446-KCA-BX-XX-DR-A-4002-P, 446-KCA-BX-XX-DR-A-4101-P, 446-KCA-CX-00-DR-A-1100-P, 446-KCA-CX-01-DR-A-1101-P, 446-KCA-CX-02-DR-A-1102-P, 446-KCA-CX-03-DR-A-1103-P, 446-KCA-CX-04-DR-A-1104-P, 446-KCA-CX-05-DR-A-1105-P, 446-KCA-CX-06-DR-A-1106-P Rev 01, 446-KCA-CX-07-DR-A-1107-P Rev 01, 446-KCA-CX-XX-DR-A-2100-P Rev 01, 446-

KCA-CX-XX-DR-A-2101-P, 446-KCA-CX-XX-DR-A-3100-P Rev 01, 446-KCA-CX-XX-DR-A-3101-P Rev 01, 446-KCA-CX-XX-DR-A-3102-P Rev 01, 446-KCA-CX-XX-DR-A-4001-P Rev 01, 446-LAN-00-XX-DR-L-1001-D Rev P3, C130822-02-01-RevB

Supporting Documents:

Landscape and Public Realm Strategy Issue R05 (02/03/2020), Transport Assessment Revision 4 (March 2020), Transport Addendum Note Revision 3 (October 2020), Framework Travel Revision 3 (February 2020), Noise and Vibration Assessment A3647/N/002 (dated 21.02.2020), Statement of Community Involvement, Historic Environment Assessment Issue 3 (25/02/2020), Energy Assessment Rev T4 (24/02/2020), Overheating Report Rev T5 (24.02.2020), Sustainability Statement (March 2020), Air Quality Assessment A3647/AQ/006 (02.03.2020), Daylight and Sunlight: Impact on Neighbouring Properties report and appendices (2 March 2020), Internal Daylight and Sunlight and Overshadowing Report Rev A (25.02.20), Solar Glare Assessment (21 February 2020), Pedestrian Level Wind Microclimate Assessment (February 26th 2020), Arboricultural Impact Assessment Rev A (September 2020), Construction Environmental Management Plan (02/03/2020), Ground Investigation Report (February 2020), Townscape and Visual Appraisal (February 2020), Planning Statement (March 2020), Heritage Statement Issue 6 (27/02/2020), Design and Access Statement Rev 3 (03/03/2020), Flood Risk and Sustainable Drainage Report draft 3 (February 2020), Ecological Impact Assessment Rev B (25/02/2020),

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

3. Constriction 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

4. Construction Environmental Management Plan

No site works or development shall take place until a construction environmental management plan (CEPM) has been submitted to, and agreed in writing by the Local Planning Authority. The CEMP shall detail the measures to reduce the environmental impacts during the construction phase and set out the arrangements for the handling of excavation, and construction waste arising from the development. The development shall be carried out in accordance with the approved plan

REASON: To ensure measures are in place to reduce environmental impacts during construction and ensure that waste management on the site is addressed from construction stage

5. Levels

No site works or development shall commence until details of the levels of the building(s), road(s) and footpath(s) in relation to the adjoining land and highway(s), and any other changes proposed in the level of the site, has first been submitted to and agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with the details so agreed.

REASON: To ensure that the works are carried out at suitable levels in relation to the highway and adjoining properties in the interests of the amenity of neighbouring residents, the appearance of the development, drainage, gradient of access and future highway improvement

6. Surface and Foul Water Disposal

No development shall take place, until works for the disposal of surface and foul water have been submitted to, and approved in writing by, the local planning authority. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter. The applicant should contact the Harrow Infrastructure Team at the earliest opportunity.

REASON: To ensure that the development achieves an appropriate greenfield run-off rate in this critical drainage area and to ensure that sustainable urban drainage measures are exploited

7. Surface Water Attenuation

No development shall take place, until surface water attenuation and storage works have been submitted to, and approved in writing by, the local planning authority. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter. The applicant should contact the Harrow Infrastructure Team at the earliest opportunity.

REASON: To ensure that the development achieves an appropriate greenfield run-off rate in this critical drainage area and to ensure that sustainable urban drainage measures are exploited

8. 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

9. Arboriculture Method Statement

No site works or development shall commence until a site-specific tree protection plan and Arboricultural method statement (to BS5837) based on the draft Arboricultural Impact Assessment has been submitted to and approved in writing by the Local Planning Authority. Details shall include:

- a) Specification and finalised location of tree protection barriers, indicated on a plan
- b) Details of demolition & construction within the RPA of retained trees - specifically relation to construction of wall within RPA of T4
- c) Details of any facilitation pruning required for access, working space etc
- d) Details of all areas of new hard-standing to be constructed using no-dig methodologies. Where no-dig is proposed, cross sections should be provided to show that raised levels can be accommodated in finished levels across site
- e) Details of site access, material / storage areas, contractor parking, site hut etc
- f) tree protection monitoring and supervision, including clerk of works schedule that specifies arboricultural supervision at appropriate stages of the development process

The development shall be carried out in accordance with the approved details or any amendment or variation to it as may be agreed in writing by the local planning authority.

REASON: to safeguard the protected trees adjacent to the application site during construction



10. Construction Ecological Management Plan

No site works or development shall commence until a Construction Ecological Management Plan (CEcMP) shall be submitted to, and approved in writing by the local planning authority. The CEcMP shall also include details of how the invasive plants from the development site shall be eradicated. The proposed development shall be carried out in accordance with the details approved.

REASON: To protect biodiversity and access to nature, including the protection of designated wildlife sites and the function of green corridors

11. 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

12. Air Source Heat Pump and Revised Energy Strategy

- a) The development hereby approved shall not commence until detailed specification and design of the Air Source Heat Pump (ASHP) and an updated energy strategy which takes into account the detailed specification and design of the ASHP has first been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the details so agreed and shall be retained thereafter.
- b) Within 3 months (or other such period agreed in writing by the local planning authority) of the final completion of the development a post construction assessment shall be undertaken demonstrating compliance with the approved Energy Statement; which thereafter shall be submitted to the local planning authority for written approval.

c)

REASON: To ensure the delivery of a sustainable development

13. Noise and Ventilation

The development hereby approved shall not commence until a detailed sound insulation scheme for protecting the proposed residential development (including balconies) from rail and other noise shall be submitted to and approved in writing by the Local Planning Authority. The submitted details shall include a ventilation strategy which would be a suitable alternative to keeping windows open and would meet the target noise levels required. Thereafter, the approved mitigation measures shall be fully implemented in accordance with the approved details and shall be retained and maintained in good working order for so long as the buildings remains in use.

REASON: To ensure that potential adverse noise impacts to residential premises within the development are mitigated

14. Contamination 1

No development shall take place until a scheme ('the second scheme') for the management of contamination risk at the site has first been submitted to, and agreed in writing by, the local planning authority. The second scheme shall include the following:

- a) details of a site investigation to provide information for a detailed assessment of the risks to all receptors that may be affected, including those off site;
- b) the results of the site investigation and an options appraisal and remediation strategy giving full details of remediation measures and how they are to be undertaken; and
- c) a verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy are complete and identifying any requirements for longer-term monitoring of pollutant leakages, maintenance and arrangements for contingency action.

The development shall be carried out in accordance with the second scheme so agreed.

REASON: To ensure that the development does not activate or spread potential contamination at the site and that the land is appropriately remediated for the approved uses. To ensure that measures are agreed and in place to identify and manage potential sources of contamination during the demolition and construction phases of the development, this condition is a PRE-COMMENCEMENT condition

15. 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

16. Secure by Design Gate Details

The development hereby permitted shall not commence until details of the security tested and certified pedestrian and vehicular gates have first been submitted to and approved in writing by the Local Planning Authority. The development shall not be occupied until the pedestrian and vehicular gates have been provided on site in accordance with the approved details.

REASON: In the interests of creating safer and more sustainable communities and to safeguard amenity by reducing the risk of crime and the fear of crime.

17. Play Space

The development hereby approved shall not commence above damp proof course level until a detailed play strategy for the site has first been submitted to and agreed by the Local Planning Authority. Such details shall comprise: a specification of all play equipment to be installed (including provision for children with disabilities and special sensory needs where possible); a specification of the surface treatment within the play areas; and a detailed assessment on the quantum of play space proposed. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development makes appropriate provision for play and informal recreation

18. Materials

Notwithstanding the details shown on the approved drawings, the development hereby approved shall not progress beyond damp proof course level until samples of the materials (or appropriate specification) to be used in the construction of the external surfaces noted below have been submitted to, and agreed in writing by, the local planning authority:

- a) facing materials for the building, including brickwork bond details;
- b) windows/ doors;
- c) balcony and balustrade detail details

The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To safeguard the appearance of the locality and to ensure a satisfactory form of development.

19. Materials 2

The development hereby approved shall not progress beyond damp proof course level until a x 1:1 sample mock-up of a window opening, surrounding brickwork and proposed brick detail to be used in the external faces of the buildings have been erected on site (or at such other location(s) as may be agreed in writing by the local planning authority) and agreed in writing by, the local planning authority. The development shall be carried out in accordance with the details, samples and drawings so agreed and shall be retained as such thereafter.

REASON: To ensure a satisfactory form of development

20. Window and Door Reveals

Notwithstanding the details shown on the approved drawings, the construction of the buildings hereby approved shall not progress above damp proof course level until there has been submitted to and approved in writing by the Local Planning Authority detailed sections at metric scale 1:20 through all external reveals of the windows and doors on each of the elevations. In the event that the depth of the reveals is not shown to be sufficient, a modification showing deeper reveals shall be submitted for approval in writing. The development shall be completed in accordance with the approved details and shall thereafter be retained.

REASON: To ensure a high quality finish to the external elevations of the building

21. Wind Mitigation

The development hereby permitted shall not progress above damp proof course level until details of measures to reduce the wind exposure to the private balconies as required by the Pedestrian Level Microclimate Assessment have first been submitted and approved in writing by the Local Planning Authority. The development shall be completed in accordance with the approved details and shall be retained thereafter.

REASON: To ensure a high quality of amenity for the future occupiers

22. Communal facilities for television reception

Prior to the first occupation of the development, details of a strategy for the provision of communal facilities for television reception (eg. aerials, dishes and other such equipment) shall be submitted to the Local Planning Authority in writing to be agreed. Such details shall include the specific size and location of all equipment. The approved details shall be implemented prior to the first occupation of the relevant phase and shall be retained thereafter. No other television reception equipment shall be introduced onto the walls or the roof of the building without the prior written approval of the Local Planning Authority

REASON: To ensure that any telecommunications apparatus and other plant or equipment that is required on the exterior of the buildings preserves the high quality design of the buildings and spaces

23. 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.

24. Landscape Management and Maintenance

The development hereby approved shall not be occupied until a scheme for the on-going management, management programme of works and maintenance of all the hard and soft landscaping within the development, to include a Landscape Management Plan, including long term design objectives, management responsibilities and landscape maintenance schedules for all landscape areas, has been submitted to, and approved in writing by, the Local Planning Authority. The Landscape Management Plan and Landscape Maintenance Plan shall be carried out in a timely manner as approved and shall be retained as such thereafter.

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes (i) to the creation of a high quality, accessible, safe and attractive public realm and (ii) to the enhancement, creation and management of biodiversity

25. Secure by Design

Prior to the first occupation of the development, evidence of Secured by Design Certification shall be submitted to the Local Planning Authority to be agreed in writing, or justification shall be submitted where the accreditation requirements cannot be met. Secure by design measures shall be implemented and the development shall be retained in accordance with the approved details.

REASON: In the interests of creating safer and more sustainable communities and to safeguard amenity by reducing the risk of crime and the fear of crime

26. Delivery and Servicing Plan

The development hereby approved shall not be first occupied until a Delivery and Servicing Plan has first been submitted to and agreed in writing by the Local Planning Authority. The revised Delivery and Servicing Plan shall include full details of the onsite Refuse Management Strategy. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter. All deliveries and servicing associated with the development shall be carried out only in accordance with the approved details.

REASON: To ensure that the transport network impact of deliveries associated with the development are managed

27. Parking Management Plan

The development hereby permitted shall not be occupied until a detailed parking management plan has been submitted to, and agreed in writing by the local planning authority. The plan shall make provision for:

- a) details of how the parking spaces would be managed;
- b) identify the electric vehicle charging point spaces that are to be provided as 'active' spaces and those as 'passive' spaces;
- c) detail the relevant blue-badge parking spaces within the car park;
- d) detail the provision of cycle parking for residential and non-residential users, including visitors to the development, which shall include the type of cycle stands proposed (including specification);

REASON: To ensure that the development provides sufficient blue badge parking, cycle, motorcycle and electric vehicle charging points.

28. Landscape Implementation

All hard landscaping shall be carried out prior to the occupation of any part of the development or in accordance with a programme that has been submitted to the Local Planning Authority in writing to be agreed. All soft landscaping works including planting, seeding or turfing comprised in the approved scheme of landscaping shall be carried out no later than the first planting and seeding season following the final occupation of the residential parts of the buildings, or the completion of the development, whichever is the sooner. Any existing or new trees or shrubs which, within a period of 5 years from the completion of the development, die, are removed, or become seriously damaged, diseased or defective, shall be replaced in the next planting season, with others of a similar size and species, unless the local authority agrees any variation in writing.

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes (i) to the creation of a high quality, accessible, safe and attractive public realm and (ii) to the enhancement, creation and management of biodiversity with the Heart of Harrow

29. Arboricultural site supervision

Prior to commencement of work at the site, the LPA will be provided with clear and obvious proof that the details of the AMS have been adhered to, either through separate reports or single larger report, summarising details of each clerk of works visit and including (where relevant) photographic evidence of adherence to the AMS and TPP. This condition may only be discharged on completion of the development, subject to satisfactory evidence of compliance through contemporaneous monitoring of tree protection throughout construction, by the appointed specialist.

REASON: to safeguard the protected trees adjacent to the application site during construction

30. Refuse Storage

The refuse bins shall be stored at all times, other than on collection days, in the designated refuse storage area, as shown on the approved drawing plans.

REASON: To safeguard the appearance and character of the surrounding area

31. Accessible and Wheelchair Dwellings

A minimum of 10% of the units shall be built in accordance with Building Regulation standard M4 (3) 'Wheelchair User Dwellings'. All other residential units in this development, as detailed in the submitted and approved drawings, shall be built to Building Regulation Standard M4(2) 'Accessible and adaptable dwellings'. The development shall be thereafter retained to those standards.

REASON: To ensure provision of 'Wheelchair and Accessible and adaptable' housing

32. Communications

Notwithstanding the provisions of Part 16 (Communications) to Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015, or any order revoking and replacing that Order with or without modification, no development that would otherwise be permitted by that part of the Order (or the equivalent provisions of any replacement Order) shall be carried out without planning permission having first been obtained by the local planning authority.

REASON: To ensure that the development preserves the highest standards of architecture and materials.

33. Appearance of Buildings

Other than those shown on the approved drawings, no soil stacks, soil vent pipes, flues, ductwork or any other pipework shall be fixed to the elevations of the building hereby approved.

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

34. Contamination 2

If, during development, contamination not previously identified is found to be present at the site then no further construction of that phase of the development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unanticipated contamination is to be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.



REASON: To ensure that the development does not activate or spread potential contamination at the site and that the land is appropriately remediated for the approved uses

35. Contamination 3

Unless otherwise agreed in writing by the Local Planning Authority, prior to the first occupation of any building within each relevant phase, site derived soils and imported soils within each phase shall be tested for contamination (to include but not limited to asbestos). All soils used for gardens and/or landscaping purposes shall be clean and free of contamination.

REASON: To safeguard the amenities of the future occupiers

## Informatives

### 1. Planning Policies

The following policies are relevant to this decision:

The London Plan (2016): 2.8, 3.3, 3.5 3.4, 3.5, 3.6, 3.8, 3.10, 3.11, 3.13, 5.1, 5.2, 5.3, 5.4, 5.5, 5.6, 5.7, 5.11, 5.12, 5.13, 5.15, 5.18, 5.21, 6.1, 6.3, 6.9, 6.10, 6.11, 6.13 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.8, 7.14, 7.15, 7.19, 7.21, 8.2

The Publication London Plan (2020): GG2, GG4, GG6, D1, D2, D3, D4, D5, D6, D7, D8, D14, H1, H4, H5, H6, H10, HC1, G6, G7, G8, SI1, SI2, SI3, SI4, SI5, SI12, SI13, T1, T2, T3, T4, T5, T6, T6.1, T7, DF11

Harrow Core Strategy (2012): CS1A, CS1B, CS1D, CS1E, CS1H, CS1I, CS1J, CS1K, CS1R, CS1U, CS1W, CS1X, CS1Z, CS8I

Development Management Policies DPD (2013): DM1, DM2, DM7, DM9, DM10, DM12, DM13, DM14, DM15, DM20, DM21, DM22, DM24, DM27, DM28, DM42, DM43, DM44, DM45, DM50

Supplementary Planning Document: Residential Design Guide (2010)

Site Allocations Development Plan Document (2013)

Planning Obligations and Affordable Housing Supplementary Planning Document (2013)

Stanmore and Edgware Conservation Area Supplementary Planning Document (2013)

Mayor of London's Housing Supplementary Planning Guidance (2016)

Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance (2017)

### 2. Considerate Contractor Code of Practice

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

### 3. The Party Wall etc. Act 1996

The Party Wall etc. Act 1996 requires a building owner to notify and obtain formal agreement from adjoining owner(s) where the building owner intends to carry out building work which involves:

1. work on an existing wall shared with another property;
2. building on the boundary with a neighbouring property;
3. excavating near a neighbouring building,

and that work falls within the scope of the Act. Procedures under this Act are quite separate from the need for planning permission or building regulations approval. "The Party Wall etc. Act 1996: Explanatory booklet" is available free of charge from: Communities and Local Government Publications, PO Box 236 Wetherby, LS23 7NB. Please quote Product code: 02 BR 00862 when ordering. Also available for download from the CLG website: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/133214.pdf>

Tel: 0870 1226 236, Fax: 0870 1226 237, Textphone: 0870 1207 405, E-mail: Ucommunities@twoten.comU4T

4. Mayoral Community Infrastructure Levy (provisional)

Please be advised that approval of this application (either by Harrow Council, or subsequently by the Planning Inspectorate if allowed on appeal following a refusal by Harrow Council) will attract a Community Infrastructure Levy (CIL) liability, which is payable upon the commencement of development. This charge is levied under s.206 of the Planning Act 2008 Harrow Council, as CIL collecting authority, has responsibility for the collection of the Mayoral CIL

The Provisional Mayoral CIL liability for the application, based on the Mayoral CIL levy rate for Harrow of £60/sqm is £51,000. This amount includes indexation which is 323/323. The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).

You are advised to visit the planningportal website where you can download the appropriate document templates. Please complete and return the Assumption of Liability Form 1 and CIL Additional Information Form 0.

[https://ecab.planningportal.co.uk/uploads/1app/forms/form\\_1\\_assumption\\_of\\_liability.pdf](https://ecab.planningportal.co.uk/uploads/1app/forms/form_1_assumption_of_liability.pdf) [https://ecab.planningportal.co.uk/uploads/1app/forms/cil\\_questions.pdf](https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf)

If you have a Commencement Date please also complete CIL Form 6:  
[https://ecab.planningportal.co.uk/uploads/1app/forms/form\\_6\\_commencement\\_notice.pdf](https://ecab.planningportal.co.uk/uploads/1app/forms/form_6_commencement_notice.pdf)

The above forms should be emailed to [HarrowCIL@Harrow.gov.uk](mailto:HarrowCIL@Harrow.gov.uk) Please note that the above forms must be completed and provided to the Council prior to the commencement of the development; failure to do this may result in surcharges and penalties

6 Pre-application engagement

Statement under Article 35(2) of The Town and Country Planning (Development Management Procedure) (England) Order 2015. This decision has been reached in accordance with paragraphs 39-46 of The National Planning Policy Framework. Pre-application advice was sought and provided and the submitted application was in accordance with that advice

7. Thames Water

The applicant is advised to contact Thames Water regarding confirmation of capacity within their system to receive the proposed discharge from the new development

8. Sustainable Urban Drainage

The applicant is advised that surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface

water management (SUDS). SUDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SUDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SUDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity. Where the intention is to use soak ways they should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365. Support for the SUDS approach to managing surface water run-off is set out in the National Planning Policy Framework (NPPF) and its accompanying technical guidance, as well as the London Plan. Specifically, the NPPF (2012) gives priority to the use of sustainable drainage systems in the management of residual flood risk and the technical guidance confirms that the use of such systems is a policy aim in all flood zones. Policy 5.13 of the London Plan (2012) requires development to utilise sustainable drainage systems unless there are practical reasons for not doing so. Sustainable drainage systems cover the whole range of sustainable approaches to surface drainage management. They are designed to control surface water run-off close to where it falls and mimic natural drainage as closely as possible. Therefore, almost any development should be able to include a sustainable drainage scheme based on these principles. The applicant can contact Harrow Drainage Section for further information

9. Compliance with conditions

Compliance with Planning Conditions Requiring Submission and Approval of Details Before Development Commences

- You will be in breach of planning permission if you start development without complying with a condition requiring you to do something before you start. For example, that a scheme or details of the development must first be approved by the Local Planning Authority.
- Carrying out works in breach of such a condition will not satisfy the requirement to commence the development within the time permitted.
- Beginning development in breach of a planning condition will invalidate your planning permission.
- If you require confirmation as to whether the works you have carried out are acceptable, then you should apply to the Local Planning Authority for a certificate of lawfulness.

10. Highways Interference

The applicant is advised to ensure that the highway is not interfered with or obstructed at any time during the execution of any works on land adjacent to a highway. The applicant is liable for any damage caused to any footway, footpath, grass verge, vehicle crossing, carriageway or highway asset. Please report any damage to [nrswa@harrow.gov.uk](mailto:nrswa@harrow.gov.uk) or telephone 020 8424 1884 where assistance

with the repair of the damage is available, at the applicants expense. Failure to report any damage could result in a charge being levied against the property.

11. Naming and Numbering

Harrow Council is responsible for the naming and numbering of new or existing streets and buildings within the borough boundaries. The council carries out these functions under the London Government Act 1963 and the London Building Acts (Amendment) Act 1939. All new developments, sub division of existing properties or changes to street names or numbers will require an application for official Street Naming and Numbering (SNN). If you do not have your development officially named/numbered, then then it will not be officially registered and new owners etc. will have difficulty registering with utility companies etc. You can apply for SNN by contacting [technicalservices@harrow.gov.uk](mailto:technicalservices@harrow.gov.uk) or on the following link.

[http://www.harrow.gov.uk/info/100011/transport\\_and\\_streets/1579/street\\_naming\\_and\\_numbering](http://www.harrow.gov.uk/info/100011/transport_and_streets/1579/street_naming_and_numbering)

12. Thames Water

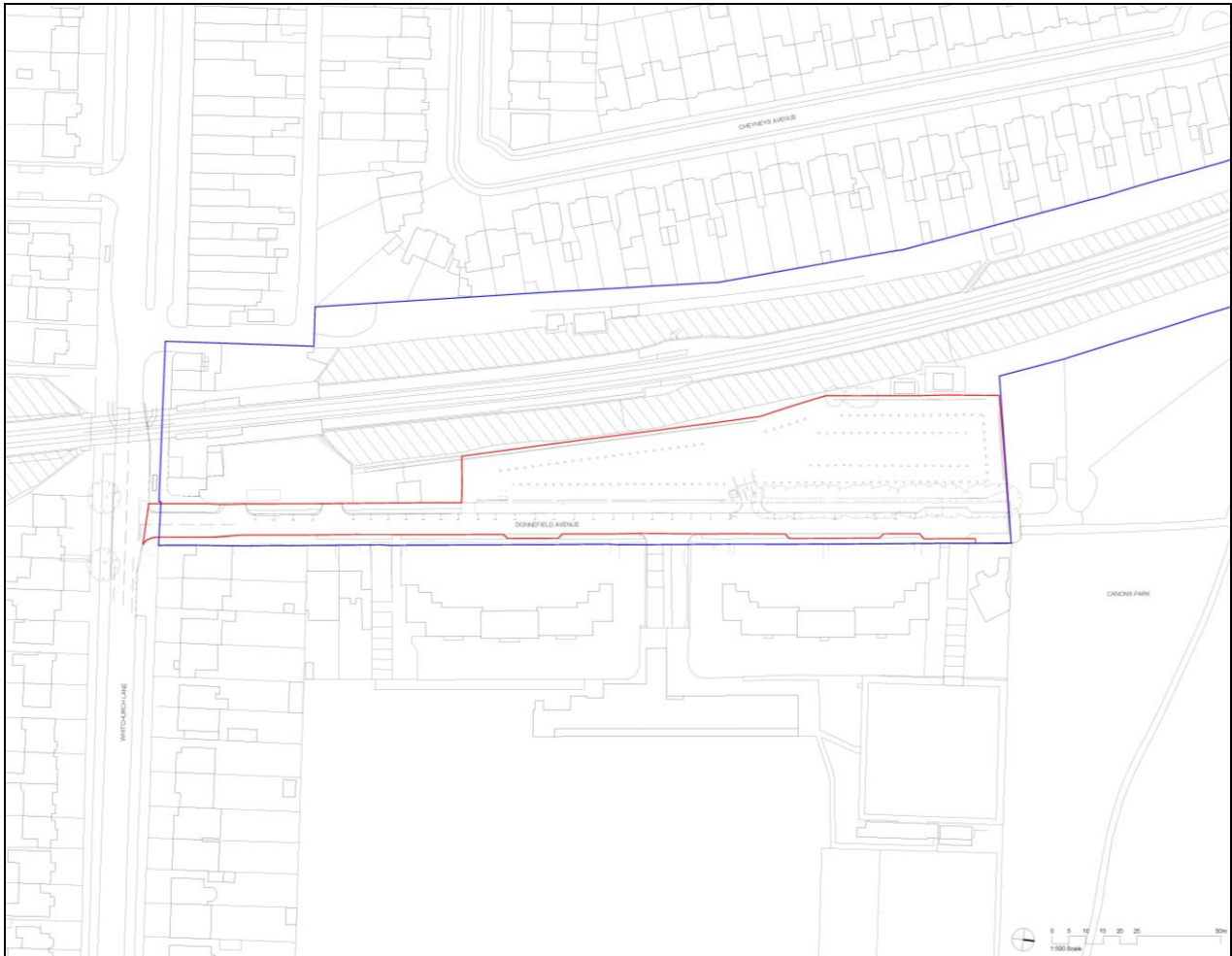
The proposed development is located within 15m of Thames Water underground assets and as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary structures

<https://developers/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

**CHECKED**

Interim Chief Planning Officer	Orla Murphy pp. Beverley Kuchar	7.1.2021
Corporate Director	Paul Walker	7.1.2021

## **APPENDIX 2: SITE PLAN**



### **APPENDIX 3: SITE PHOTOGRAPHS**

(n.b – the pictures are provided solely to identify the application site and are not representative of the general car park occupancy levels)



View towards the application site from Donnefield Avenue



View of the station car park from the pedestrian footway



Existing Station Car Park Entrance



View of the station car park facing south





View towards the northern boundary of the application site



View of Canons Park Entrance from Donnefield Avenue



View towards application site adjacent from the Canons Park Entrance



View of application site from within Canons Park, adjacent to Wyel Lodge

# APPENDIX 4: PLANS AND ELEVATIONS





Catalyst Housing Ltd  
**C**  
 catalyst  
**T**  
 Transport  
 for London

01-1007-0004 (Plan No. 1007-0004)  
 This drawing is a preliminary design and is not intended to be used for construction purposes.  
 It is for information only and does not constitute an offer of any services.  
 No liability is accepted for any errors or omissions.

Note: Refer to relevant consultants information for details on Structures, M&E Services, Highways & Civils proposals.  
 Refer to Transport Consultant and Landscape Architect information for the car park and public realm proposals.

**Unit Types Key**

- 1B2P
- 2B2P
- 3B2P
- 3B3P
- 3B4P
- Lobby
- Plant
- Cleaner's Store
- Refuse Store
- Residential Cycle Store
- Tk Cycle Hub

01 Planning Comments 20/11/21  
 02 Planning Submission 20/09/21

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 The Royal Arcade  
 98 Chancery Road  
 London EC2A 4JQ  
 t: +44 (0)20 7429 8800  
 e: info@karusevic-caron.com | 0037 144 6388

Canons Park  
 Donnefield Avenue, Edgware,  
 HA8 6RL

Proposed Sixth Floor Plan



1 Proposed Site East Elevation  
1:500

2 Proposed Site West Elevation  
1:500

3 Proposed Site North Elevation  
1:500

4 Proposed Site South Elevation  
1:500

Catalyst Housing Ltd  
**C**  
 catalyst  
**T**  
 Transport  
 for London

01-1007-0004 (Plan No. 1007-0004)  
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 Refer to Transport Consultant and Landscape Architect information for the car park and public realm proposals.

**Proposed Site Elevations**

01 Planning Comments 20/11/21  
 02 Planning Submission 20/09/21

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Proposed Site Elevations