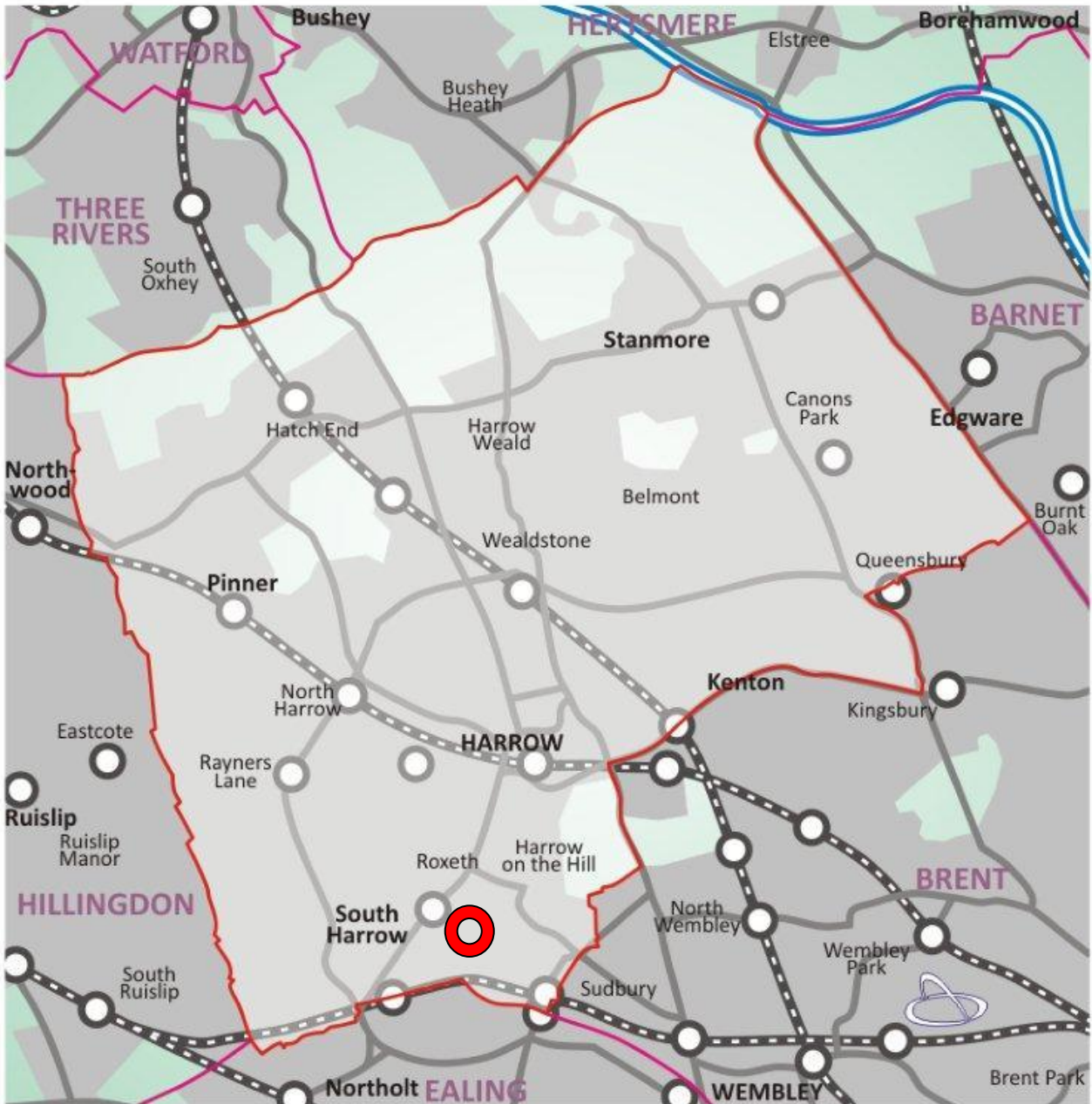


 = application site



<b>Units 1, 1a and 2 Northolt Road Retail Park</b>	<b>P/2052/20</b>
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# NORTHOLT ROAD RETAIL PARK



# LONDON BOROUGH OF HARROW

## PLANNING COMMITTEE

20<sup>th</sup> January 2021

**APPLICATION NUMBER:** P/2052/20  
**VALIDATE DATE:** 23<sup>rd</sup> JUNE 2020  
**LOCATION:** UNITS 1, 1A AND 2 (DUNELM, SPORTS DIRECT AND HOME SENSE) NORTHOLT ROAD RETAIL PARK, 140 NORTHOLT ROAD ROXBOURNE  
**WARD:**  
**POSTCODE:** HA2 0EG  
**APPLICANT:** NORTHOLT RETAIL PARK LLP  
**AGENT:** MR SUNNY DESAI  
**CASE OFFICER:** SELINA HOTWANI  
**EXTENDED EXPIRY DATE:** 20<sup>th</sup> MARCH 2021

### PROPOSAL

Redevelopment of the site to provide new residential accommodation (Use Class C3) 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) Refer this application to the Mayor of London (the GLA) as a Stage 2 referral; and
- 3) Subject to the Mayor of London (or delegated authorised officer) advising that he is content to allow the Council to determine the case itself and does not wish to direct refusal, or to issue a direction under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application, delegate authority to the Interim Chief Planning Officer in consultation with the Director of Legal and Governance Services for the completion of the Section 106 legal agreement and other enabling development and issue of the planning permission, subject to amendments to the conditions, including the insertion or deletion of conditions as deemed fit and appropriate to the development or the amendments to the legal agreement as required. The Section 106 Agreement Heads of Terms would cover the following matters:
  1. **Affordable Housing**
    - Provision of 39 affordable homes: 13 shared ownership (inclusive of discount market sales units) and 26 affordable rent

- 10% of affordable rent accommodation to be constructed and ready for occupation as wheelchair standard homes.
- Early stage review
- Late stage review

## **2. Carbon Offset**

- Payment of a total financial contribution of £237,559 towards carbon offset. Payable upon commencement of each phase on a pro rata basis.
- Provision of certification of actual/ as-built carbon emission achieved on site and payment of any shortfall in carbon reductions calculated at a rate of £60 per tonne of carbon to be offset per year, over a 30 year period.
- Provision of commitment the development will be designed to enable post construction monitoring and that the information set out in the 'be seen' guidance is submitted to the GLA's portal at the appropriate reporting stages.

## **3. Energy Centre**

- Provision of a safeguarding route to a connection to any future wider District Heat Network.

## **4. Highways and Parking**

- 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. Appointment of Travel Plan Coordinator. Travel Plan monitoring fee of £5,000.
- A contribution for further parking surveys (£10,000) to be carried out prior to occupation and post occupation of the 100th 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.
- Provision of a car club space.
- The developer to enter into a Section 278 agreement to facilitate alterations to the service road on the southern access of the development site, improved lighting to the footway link to Stanley Road and implementation of traffic calming measures including speed cushions.

## **5. Employment and Training Plan**

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

- S106 agreement will include penalty clauses for non-compliance with the above. Non-compliance is failure to deliver the obligations in the section 106 Agreement, irrespective of whether
  1. the Agreement states that it will discharge the obligation
  2. the Developer has paid the council (Xcite) to employ a training and employment co-ordinator and beneficiary funds to discharge the obligations, but the developer's contractors fail to work with Xcite to provide skill, apprenticeship and employment opportunities. HB Law has been working on relevant clauses.
- A minimum of 15% of spend during the construction of the development is with suppliers in the council's administrative area.

#### **6. Legal Costs and Monitoring Fee**

- Payment of section 106 monitoring fee upon completion of section 106 agreement (amount TBC)
- Payment of all reasonable legal fees upon completion of section 106 agreement

### **RECOMMENDATION B**

That if the Section 106 Agreement is not completed by **20 March 2021** or as such extended period as may be agreed by the Interim Chief Planning Officer, then it is recommended to delegate the decision to REFUSE planning permission to the Interim Chief Planning Officer on the grounds that:

The proposed development, in the absence of a Legal Agreement to provide appropriate improvements, benefits and monitoring that directly relate to the development, would fail to adequately mitigate the impact of the development on the wider area and provide for necessary social, environmental and physical infrastructural improvements arising directly from the development, contrary to the National Planning Policy Framework (2019), policies 3.11, 3.13, 5.2, 6.3, 7.4, 7.5 and 7.6 of The London Plan (2016), Core Strategy (2012) policy CS1 and policies DM1, DM2 DM42, DM43 and DM50 of the Harrow Development Management Policies Local Plan and the Supplementary Planning Document: Planning Obligations (2013).

### **REASON FOR THE RECOMMENDATIONS**

The redevelopment of the site would enhance the urban environment in terms of material presence, attractive streetscape, good routes and access and would make a positive contribution to the local area, in terms of quality and character and delivering new public spaces to support the wider masterplan and community. The massing and scale proposed would appropriately relate to the wider masterplan site and would permit full optimisation of this previously developed land to bring forward much needed housing which would positively add to the Council's housing delivery targets. The proposal would secure the provision of affordable housing at a level that meets the minimum affordable housing target set out in the development plan.

The layout and orientation of the buildings and separation distance to neighbouring properties is considered to be satisfactory to protect the amenities of the neighbouring

occupiers and the development would contribute towards the strategic objectives of reducing the carbon emissions of the borough.

The decision to grant planning permission has been taken having regard to the National Planning Policy Framework (2019), the policies of The London Plan (2016), The Publication London Plan (2020), Harrow's Core Strategy (2012) and the policies of the Harrow Development Management Policies Local Plan (2013), as well as to all relevant material considerations including the responses to consultation.

## **INFORMATION**

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

Statutory Return Type:	Large scale major development
Council Interest:	None
GLA Community	£998,880
Infrastructure Levy (CIL)	
Contribution (provisional):	£2,730,604.96

## **HUMAN RIGHTS ACT**

The provisions of the Human Rights Act 1998 have been taken into account in the processing of the application and the preparation of this report.

## **EQUALITIES**

In determining this planning application the Council has regard to its equalities obligations including its obligations under section 149 of the Equality Act 2010.

For the purposes of this application there are no adverse equalities issues.

## **S17 Crime & Disorder Act**

Policies 7.3.B and 7.13.B of The London Plan and Policy DM1 of the Development Management Policies Local Plan require all new developments to have regard to safety and the measures to reduce crime in the design of development proposal. It is considered that the development does not adversely affect crime risk.

## Planning Application Fact Sheet

The Site	
Address	Units 1, 1a and 2 Northolt Road Retail Park, 140 Northolt Road, HA2 0EG
Applicant	Northolt Retail Park LLP
Ward	Roxbourne
Local Plan allocation	N/A
Conservation Area	N/A
Listed Building	N/A
Setting of Listed Building	N/A
Building of Local Interest	N/A
Tree Preservation Order	N/A
Other	N/A

Housing		
Total Unit Numbers	191	
Density	PTAL	4
	London Plan	700-1100 hr/ha
	Proposed Density	499 hr/ha
Dwelling Mix	Studio (no. / %)	0
	1 bed (no. / %)	73 (41%)
	2 bed (no. / %)	76 (43%)
	3 bed (no. / %)	25 (14%)
	4 bed (no. / %)	4 (2%)
	Overall % of Affordable Housing	25% (by habitable room) 20% (units)
	Affordable Rent (no. / %)	26 (73%)
	Intermediate (no. / %)	13 (27%)
	Private (no. / %)	152 (80%)
	Commuted Sum	N/A
	Comply with London Housing SPG?	Yes
Comply with M4(2) of Building Regulations?	Yes	

<b>Non-residential Uses</b>		
Existing Use(s)	Existing Use / Operator	N/A
	Existing Use Class(es) sqm	A1 (Retail)
Proposed Use(s)	Proposed Use / Operator	Use Class C3
	Proposed Use Class(es) sqm	C3 – 16,648 sqm
Employment	Existing number of jobs	33
	Proposed number of jobs	Circa 500 over a 3 year period

<b>Transportation</b>		
Car parking	No. Existing Car Parking spaces	386 (across whole retail park)
	No. Proposed Car Parking spaces	67 (0.35 spaces per unit)
	Proposed Parking Ratio	0.35 spaces: 1 unit
Cycle Parking	No. Existing Cycle Parking spaces	N/A
	No. Proposed Cycle Parking spaces	299; 5 visitor spaces
Public Transport	PTAL Rating	4
	Closest Rail Station / Distance (m)	South Harrow Station
	Bus Routes	395, 140, 116, H9 and H10
Parking Controls	Controlled Parking Zone	Stanley Road Northolt Road
	CPZ Hours	Stanley Road: Mon-Sat 10am -9pm Northolt Road: Mon-Sat (10-11 and 14:00-15:00)
	Other on-street controls	Adopted section of site access single yellow lines (Mon-Sat 8am-6.30pm) Beyond adopted section, private parking enforcement is in place Single yellow lines both sides of Northolt Road (Mon-Sat, 07:00-19:00)
Refuse/Recycling Collection	Summary of proposed refuse/recycling strategy	Each Core will have its own bin store with separate bins for the collection of general waste and recycling. There are 4 refuse collection points.



<b>Sustainability / Energy</b>	
BREEAM Rating	N/A
Development complies with Part L 2013?	Yes – 43% reduction

## **1.0 SITE DESCRIPTION**

- 1.1 The application site is located on the north-west corner of Northolt Road Retail Park and is 1.03 hectares in size. The site comprises two large units that contain three retail stores: Sports Direct, Home Sense and Dunelm. The remainder of the application site is a strip of surface car parking and access on the north eastern and south eastern side of the site as well as part of the delivery and servicing area and access on the western side.
- 1.2 The site is bound to the west by a designated Industrial use area known as the Brember Road Industrial Estate comprising a mix of industrial and retail units. To the north is the Grange Farm Estate which has extant permission for a comprehensive redevelopment for between three and eight storey residential buildings with community uses under planning permission P/3524/16 dated 29/03/2019. A Waitrose Supermarket and associated car parking is also within the Northolt Road Retail Park and located to the south and east. The site is accessed via a roundabout off Northolt Road and retains a right of access over the retail park's unadopted access roads to the south which is the main vehicular access.
- 1.3 The site does not contain any designated heritage assets and is not located within a conservation area. The Mount Park Estate Conservation Area is located approximately 350m away, the site is approximately 300m from the Roxeth Hill Conservation Area and approximately 260m from Grade II listed 29-37 Horn Buckle Close. The site is located within RAF Northolt's conical protected surfaces and is in a critical drainage area. There is an existing water culvert that runs through part of the site primarily under part of the southern and eastern accesses.
- 1.4 The site has a Public Transport Accessibility Level Rating of 4 which is considered Good. The site is also served by a number of bus routes and located less than 10 minutes away (by foot) from South Harrow Town Centre and South Harrow Underground Station.

## **2.0 PROPOSAL**

- 2.1 The proposed development seeks full planning permission for the demolition of existing retail units: Sports Direct, Dunelm and Home Sense and the redevelopment of the site to provide three buildings ranging from 4-6 storeys for the provision of 191 residential units, associated landscaping, access, parking, refuse and cycle parking, associated works.
- 2.2 67 standard parking spaces are proposed within the podium parking area, along with a further 13 accessible parking spaces and 2 motorcycle spaces. 528 long

stay cycle spaces are proposed along with 9 short stay cycle spaces. In terms of non-residential cycle parking spaces, 1 long stay space and 4 short stay spaces are proposed.

2.3 A breakdown of the proposed development by plot is listed below.

#### **Plot 01 (Linear Block)**

2.4 This plot would consist of 112 residential apartments, of which 1 would be Intermediate housing. 67 units are proposed to be 1 bed, 31 units would be 2 bed (4 person) and there would be 14 x 3 bed units (all being 5 person). 22 of these units would be wheelchair accessible units.

2.5 The buildings would be located north west of the site and would range in height from 4 to 6 storeys arranged in three blocks each with their own communal residential entrance. Car parking is accessed south of the block below a podium via the main vehicular access to the site along the existing service and delivery road. To the rear of these blocks are open podium-level courtyards, private gardens with play facilities.

2.6 Two cycle parking areas are proposed within Plot 1. 72 spaces are centrally located comprising 27 double stacker long stay spaces and 9 outdoor short stay spaces (7 Sheffield stands; 2 wide Sheffield stands) and a further 136 spaces are located on the northern area comprising 48 double stacker long stay spaces and 20 short stay (14 Sheffield stands; 6 wide space Sheffield stands). Four motorcycle spaces are also housed within the podium car park. Each of the three blocks have a dedicated refuse store.

#### **Plot 02 (Pavilion Block)**

2.7 Plot 02 would consist of 2 stepped blocks, ranging from 5 and 6 storeys in height centrally located between Plots 01 and 03 within the site. This plot would comprise 42 residential units of which 1 unit would be for Intermediate housing (and wheelchair accessible). 5 units are proposed to be 1 bed (1 person), 10 units would be 1 bed (2 person), 22 units would be 2 bed (4 person) and 4 units would be 3 bed (5 person).

2.8 A single dedicated refuse store is located adjacent to the main communal entrance of the building. An amenity area is located south of the building incorporating play space. All ground floor units would incorporate separate entrances and private amenity spaces. A dedicated cycle store is also located at ground floor level.

#### **Plot 03 (Mews Block)**

2.9 This plot would comprise 37 residential apartments, all of which would be affordable housing. This plot comprises a linear block located on the northern boundary of the site comprising 4 storeys on the eastern side and would step up to 6 storeys westwards. 9 units would be 1 bed (2 person), 17 units would be 2 bed (4 person) and 10 units would be 3 bed (5 person). The plot would include 2 wheelchair accessible units. This plot varies in typology in that it would provide 3

bedroom maisonettes to the majority of ground and first floor. These would benefit from private courtyard gardens from the street and a terrace to the rear at first floor. The upper levels would comprise traditional flatted units with a series of inset and infill balconies.

- 2.10 Either side of this block are links to the Grange Farm development to the north. The Mews Block will be car free only allowing Emergency Access, this would be enforced via a bollard system.

### **Public Realm**

- 2.11 The site would be accessed via two points. To the east, the existing access to the car park of the retail park would be altered so that there is a single entry and exit point (off the roundabout) thereby removing separate access to the adjacent petrol station. This would result in a reconfiguration of the Waitrose car park to create an entry and exit point from within the car park adjacent to the proposed Mews Street (Plot 03). For visitors and future occupiers of the proposed development, this access would be solely for pedestrians, cyclists and emergency vehicles.
- 2.12 The main vehicular access, cycle and pedestrian entrance to the site would be via the existing service road to the south-west. Landscape improvements and dedicated paths for cyclists and pedestrians would be incorporated. Vehicle access would be limited to the podium car park to restrict car movements within the site. Two connections to and from Grange Farm on the north and west boundaries are proposed. The northern connection would lead to an arrival space within the proposed development.
- 2.13 The site boundaries are proposed to be characterised by green vegetation comprising semi-woodland, low maintenance planting. Three main public spaces are proposed, play spaces as well as parks and garden areas, some of which are also private. A variety of boundary treatments are proposed on the boundaries fronting the car park of the retail park.

### **3.0 RELEVANT PLANNING HISTORY**

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

<b>Ref no. Description</b>	<b>Status and date of decision</b>
WEST/46006/93/OUT – Outline: Retail foodstore (Class A) (4,645sqm), petrol station, access and parking	Granted 28/04/1994
WEST/124/94/FUL- Retail foodstore (Class A1) (3,872sqm), petrol station, access/parking, revised retention of offices, store, car park	Granted subject to legal agreement 30/03/1995
WEST/726/95/FUL – Detached building to provide 2 units of non-food retail floorspace totaling 3,050 sqm with access and parking	Agreed subject to legal agreement, legal agreement not

	signed.
<b>Unit 1B (Home Sense)</b>	
WEST/324/95/FUL – Retail Foodstore Class A1 3272m <sup>2</sup> , Petrol Filling Station, Access, Parking, Retention of Offices, Store Car Park (Revised)	Granted 28/02/1996
WEST/407/98/FUL – Detached Building To Provide Two Units of Non-Food Retail Floorspace Totalling 2978m <sup>2</sup> (Net) With Access and Parking	Granted 19/10/2000
P/1238/04/CVA - Variation of Condition 20 of Planning Permission WEST/407/98/FUL to Permit the Sale of Sports Goods, Clothing and Footwear	Granted 09/07/2004
P/0286/08/CVA - Installation of a Mezzanine Floor (in new subdivided retail store).	Granted 19/03/2008
P/1628/08VA - Variation of condition 20 to planning permission west/407/98/ful and condition 2 of planning permission P/0286/08/CVA to allow sale of non-food comparison retail goods	Granted 27/06/2008
P/1635/08VA - Variation of condition no. 2 of planning permission P/0286/08/CVA to allow sale of non-food comparison retail goods	Granted 27/06/2008
P/4381/14 – External alterations to unit	Granted 06/01/2015
P/4375/14 – Installation of mezzanine	Granted 16/02/2015
P/4381/14 – External Alterations to unit	Granted 06/01/2015
<b>Unit 2</b>	
WEST/407/98/FUL – Detached building to provide 2 units of non-food retail floorspace totalling 2973 sqm. (net) with access and parking	Granted 19/10/2000
P/0483/08DFU – Alterations to shopfront and side elevations	Granted 31/03/2008

#### 4.0 **CONSULTATION**

4.1 5 x Site Notices were erected on 25 June 2020 expiring on 06 August 2020 (42 days).

4.2 Press Notice was advertised in the Harrow Times on the 2<sup>nd</sup> July 2020 expiring on 23<sup>rd</sup> July 2020. The application was advertised as a major application.

4.3 A total of 948 notification letters were sent to nearby properties regarding this application. The public consultation period expired on 05 August 2020.

4.4 A re-consultation took place on 18 November 2020 for a period of 28 days expiring on 09 December 2020. 5 x site notices were erected on 20 November 2020, expiring on the 18 December 2020. The re-consultation accounted for the following revisions:

- Amendments to the proposed landscape masterplan and site redline boundary;
- Changes to the proposed affordable housing provision;
- Amendments to the affordable housing mix;
- Changes to the location of wheelchair accessible unit provision;
- Revised Fire Statement, prepared by Clarke Bank;
- Revised Energy Statement, prepared by JAW;
- Increased typology and provision of play space; and
- Addition of a Green Roof/PV Plan.

#### 4.5 **Adjoining Properties**

Number of letters sent 1 <sup>st</sup> Consultation	948
Number of letters sent 2 <sup>nd</sup> Consultation	963
Number of Responses Received 1 <sup>st</sup> Consultation	28
Number of Responses Received 2 <sup>nd</sup> Consultation	6
Number in Support	1
Number in Support (2 <sup>nd</sup> consultation)	36
Number of Objections	27
Number of Objections (2 <sup>nd</sup> consultation)	4
Number of other Representations (neither objecting or supporting)	1

4.7 27 objections were received from adjoining residents after the first consultation and one letter of support and 6 objections, 36 support letters and 1 general comment were received after the second consultation.

4.8 A summary of the responses received along with the Officer comments are set out below:

***Impact to operation of Waitrose***

Waitrose keen to ensure proposed development would not impede on store's existing operation.

Existing permission which restricts the reconfiguration of Waitrose car park. If planning permission is granted a condition to reconfigure Waitrose car park should be included to ensure they can continue to trade successfully.

Request for legal agreement / condition to be in place to ensure that pedestrian route / cycleway along the eastern boundary of the site due to ownership issue with Waitrose and removal of existing car parking spaces and exit slip road to Shell Petrol Station. This may result in congestion.

Landscaping proposed on eastern boundary is outside ownership of applicant. Row of trees proposed on western boundary of Waitrose store should not harm the existing retail structure. Evidence should be provided to this effect.

Boundary treatment: Effective acoustic, visual and potential security barriers between the car park and residential units should be provided. Full description of boundary treatments should be included as a condition.

Access Route: The existing service road would be used by vehicles, pedestrians and cyclists of the new development but this was never designed to used by the general public. Waitrose wish to see tracking of their vehicles to ensure that the development would not compromise HGV movements to and from the store as well as ensure the safety of pedestrians using this path.

Parking provision: S106 should be agreed to include an ANPR or fund the cost of patrolling car park to ensure residents or visitors to development are discouraged to park in the Waitrose car park.

Impact of construction: Waitrose request a condition to allow a full CLP for review to ensure that construction impact to the store is minimised is included to any grant for permission.

Amenity concerns: Appropriate noise mitigation should be put in place within the housing design so that these are sufficiently robust from the outset so as not compromise the existing Waitrose operation. EHO comments should be made available.

***Second consultation:***

- Permission WEST/324/95/FUL has a restrictive condition which approves the car parking layout and states these should be permanently marked out and used for no other purposes without the written permission of the local planning authority. If permission is granted a condition stating that the development cannot be implemented until planning permission has been granted to

reconfigure the Waitrose car park.

-The revised scheme involves the removal of the exit slip lane into the PFS meaning all vehicles have to enter the station via the minimum roundabout.

Waitrose are concerned with this arrangement resulting in congestion.

- It is noted that the southern access is now the primary vehicular access point, where Waitrose currently services the store. Subject to the applicant demonstrating that the proposed vehicular access arrangement to the Waitrose store is acceptable, Waitrose to do not object. Careful consideration with regards to delivery and servicing should be addressed to provide safe access to the site.

**Officer Comments:**

*Any grant for planning permission would allow for the reconfiguration of the car park to take place. As the restrictive condition is outside of the site boundary and the developer does not own the site under which the condition has been imposed, the developer cannot be obligated to relieve any restrictive conditions outside of their site ownership / development boundary. Furthermore, the development does not rely on access to and from the development from within the Waitrose site and is envisaged to provide sufficient safety measures including lighting strategies within the proposed development and it is therefore considered unreasonable for the developer to provide either an ANPR or fund the cost of patrol officers within the Waitrose site.*

*The removal of the retail units and new vehicular entrance to the site is envisaged to result in a significant reduction of traffic using the access adjacent to the PFS. The LPA therefore consider that the reduction to a single point would provide a streamlined and safer route for users.*

*Improvements via Section 278 legal agreement would ensure that the southern access provides a safe route for pedestrians and cyclists. The developer has also provided information on the low levels of servicing per day for the Waitrose which would further reinforce the safety of this route.*

*Details of boundary treatments, construction and noise mitigation have been secured by condition.*

**Traffic and congestion**

Area already congested due to neighbouring developments, evidenced by increased traffic, pollution, noise and crime/anti social behaviour.

Queues and overcrowding on public transport, potential risk to people.

No safe cycle routes to key destinations in Harrow

**Officer Comment:** *The impact on the surrounding highway in terms of congestion, parking, transport services and air pollution has been addressed under 'Traffic, Parking, Access, Servicing and Sustainable Transport' and 'Air Quality' sections of the appraisal below. Provision of wider cycle route infrastructure is outside the remit of the current application.*

**Loss of retail units**

Already limited superstores. Proposal would result in loss of easy access to these as well as physical activity for locals.

**Officer Comment:** *There are no planning restrictions that would preclude the site from coming forward for residential development.*

**Insufficient infrastructure**

Current residents of this area already face denials/ challenges getting council parking permits. There are not enough GP Surgery, Schools, Recreation facility to support new development.

Transport infrastructure would be exacerbated.

**Officer Comments:**

The provision of local infrastructure is outside of the remit of the current application, however Community Infrastructure Levy for the market properties will retrieve funds towards these services.

**Other matters**

Lack of objections available to view on the website between July 7<sup>th</sup> and 26<sup>th</sup> July 2020

Increase in noise, dust and pollution

There is no demand for low quality residential properties in South Harrow

**Officer Comments:**

*-All comments are available to view online. During the summer period there were a number of major applications which were submitted concurrently which resulted in a large volume of comments being lodged at the same time for various applications. This resulted in a delay in uploading all the comments. However, an extended consultation period was provided of 6 weeks and it is therefore not considered any interested party would have been disadvantaged as a result.*

*- Noise and dust limitation will be secured by condition.*

*-The proposed housing would meet and exceed policy thresholds in respect of national housing standards and is therefore considered to be of high quality.*

**Support Letters:**

- 25% affordable homes (72% of which would be family homes) is much needed and help Harrow meet Housing targets.

- Development creates over 1000sqm green space, including new trees, public gardens and playspace



4.9 Statutory and Non Statutory Consultation

4.10 The following consultations have been undertaken:

**LBH Policy Officer**

The existing use is retail (Use Class A1) but is noted as not being within a designated business use area, designated town centre, or designated town centre parade. By reason of this (and although a number of comments have been received objecting to the loss of the retail units), the employment floorspace is not protected by policy as it would if it were to be located within the locations listed above. Given the above, there is no objection to the loss of the retail Use (Use Class A1). 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 South Harrow 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.

The proposed development, by reason of exceeding ten units on site, is required to make a contribution to affordable housing.

**LBH Highways Officer**

*First consultation:*

Overall, with mitigation, the proposal is unlikely to result in a severe or harmful impact to the surrounding highway network, therefore, subject to conditions and obligations, Highways have no objection.

*Second consultation:*

The reduction in number of lanes is a positive for pedestrians using the supermarket as it means less opportunity for conflict as all vehicular movements are concentrated into a single area however, no dedicated ped/cycle link is not ideal. The main pedestrian route to the south is less desirable as this is where servicing for Waitrose takes place. The revised options are feasible but not as good as the previous plans. This layout does not offer quite the same level of safety and is less appealing.

However, these options could work provided they do not hinder HGV access at all. Improvements to the service road beyond the application boundary can be dealt with via Section 278 legal agreement and would encourage sustainable and safe travel from the main pedestrian and cycle access route proposed to and from the site.

**LBH Energy Officer**

The submitted energy strategy is notes that the overall saving would be 43% on site which is in excess of the required on-site savings of 35%. Therefore,

the proposed development would achieve a satisfactory on-site savings for a residential development.

The applicant has proposed an interim strategy to be utilised until such time as the development is able to be connected to the Grange Farm heat network. This approach is supported by Policy S13D(a) and is therefore encouraged and should be secured by way of condition.

The application requires a s.106 obligation to secure the off-site contribution which would be calculated post construction.

**LBH Drainage Officer**

I can confirm that the information provided in the addendum are satisfactory and the application can be approved conditionally.

**LBH Tree Officer**

There are no preserved trees within influencing distance of the proposed development and due to the nature of the current site (mainly industrial buildings and hard standing) there are no internal trees which would pose a constraint on the development. There are several trees near to the north boundary, within the housing block to the N / NE however these should not be impacted by, or pose a constraint on the proposed site – No objections

**LBH Network Manager**

No objections.

**LBH Landscape Architects**

*First consultation:*

Much more detailed information would be required to understand all the proposed hard and soft landscape details and this can be conditioned, these shall include:

- The third, fourth floors show outdoor amenity terraced spaces with hard surfacing and soft landscape. Details are required on the proposed privacy screens including obscured glass balustrade for outdoor amenity terraced spaces.
- Information on the microclimate and how windy the terraced areas might be would be required.
- Green roof proposals together with how the soft landscape on all the flat roofs would be managed and maintained.
- Details of the proposed bin and bike stores and the soft landscape screen required.
- Proposed external lighting and layout required.
- Details required of how the public realm areas are to be managed and maintained to ensure the ongoing success of all the external landscaped

amenity spaces.

*Second consultation:*

The revised proposals are of concern.

Much more detail is required to understand how the proposal might work. There would be no opportunity for soft landscape, as already shown on the existing masterplan. Further details and revised information should be requested by condition for further review.

**LBH Biodiversity Officer**

Conditions have been outlined to make the scheme acceptable in planning terms, by ensuring that it will have a positive impact on biodiversity, but the applicant will need to outline and commit to the implementation of detailed proposals in this regard.

**LBH Housing Enabling Manager**

*First Consultation:*

The Council's LAR target bed size mix has been calculated to meet the borough's priority need, with its greatest needs being for 2 and 3 bed LAR units and a person occupancy mix for LAR of 2b 4 person and 3b 5 person units. This bed mix offer will not be compliant as it will not meet the borough's priorities.

In terms of internal layout of the LAR units, Housing do not want units being offered as en-suites however to meet the needs of the Council's applicants Housing would like a separate living / dining room and kitchen areas if possible. Housing have no comment on the size or configuration of LSO units.

For the sake of handling the management and service charge of the AH units, Housing require the LAR units to be in a separate core or only sharing with the LSO units. (The LSO units could also share a core with private units). Housing require 10% of all the LAR units to be fully wheelchair adapted, with a 2 / 3 bed preference.

*Second consultation:*

This scheme is offering the maximum reasonable amount of AH deliverable, with a preferential balance of 2 and 3 bed LAR units which will meet Harrow's greatest housing need. Housing would therefore support the application (Further details are provided within Section 6.3 of this report).

**LBH Waste Officer**

The route looks fine for the majority of the North East part of the site. No collection points/access are highlighted along the back end so the Council would expect those bins to be brought to collection points on the estate with suitable access for the vehicle and staff. A condition requiring the development to be carried out as per the delivery and servicing plan submitted is suggested.

### **LBH Urban Design**

This is a well-designed residential development. The layout has been thought about carefully to minimise the impact of the car park on the development, with clearly defined fronts and backs to the main blocks and quieter garden and courtyard spaces to the edge of the site away from the carpark. Future development **of the Waitrose carpark has been looked** at as part of a wider masterplan for the site in the application. New access to the site and areas for highways improvements to upgrade connections to Northolt Road and South Harrow Station are welcomed. New links to the adjacent Grange Farm site have also been made, which will be positive for both developments, and allows the residents to access the Grange Farm communal landscape and community facilities.

The landscape design has been well executed to create a series of different types of spaces and soften some of the more challenging areas of the site. The play strategy provides a range of different play space for different ages, and the two main streets within the scheme are designed to be play streets. Traffic and access through

There are three types of building proposed – mews, linear and pavilion block. Care has been taken to ensure that frontages are as active as possible, with front doors to streets, and homes are well laid out and designed.

### **LBH Economic Development**

If the development is approved, as a major application, the following is sought in any s106 agreement:

- Construction Training – a requirement to produce a training and employment plan and provide a financial contribution
- Local Supplier targets
- Economic Development would seek through the planning system to mitigate the loss of the jobs associated with the existing development and the loss of future potential employment on the site.
- Construction Training
  - This will be secured through
  - (i) a training and employment plan that will be agreed between the council and the developer prior to start on site and
  - (ii) a financial contribution towards the management and delivery of the construction training programme based on the build cost of the development. This is usually charged based on a formula of £2500 per £1m build cost.
- To ensure local businesses benefit from the investment in the area, the Economic Development Team require that 15% of spend during the construction of the development is with suppliers in the council's administrative area.
- Any s106 agreement will include penalty clauses for non-compliance with the above.

**LBH Travel Plan Officer:**

We need the following to be secured by legal agreement:

- Monitoring fee of £5k
- Bond to be agreed between Council and developer
- Residential TP with specified requirements

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

**External Consultation**

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

**GLA (including TfL comments)**

*First consultation:*

**Principle of Development:** The loss of retail uses does not raise strategic concern (paragraphs 13-16).

**Affordable Housing:** The applicant's viability assessment will be robustly scrutinised by GLA Officers to ensure the scheme provides the maximum reasonable amount of affordable housing. Early and late stage viability review mechanisms, and affordability levels should be secured (paragraphs 17-26).

**Design:** The proposal seeks to optimise the site and the proposed building heights are sympathetic to the surrounding context. Further consideration should be given to elements of residential quality, and further information is required in relation to the proposed play strategy. A revised fire statement must also be provided, evidencing compliance with the Mayor's Intend to Publish London Plan Policy D12 (paragraphs 30-48).

**Transport:** Options for improved pedestrian access to the site, as well as links from the proposed on-site cycle route into wider cycle routes, should be reviewed and improved. An assessment of collision analysis should be undertaken. A delivery and servicing plan, and construction logistics plan should be secured by condition. (paragraphs 64-70).  
Issues relating to energy, air quality and urban greening need to be addressed.

**Recommendation:** That Harrow Council be advised that the application does not yet fully comply with the London Plan and the Mayor's Intend to Publish London Plan, for the reasons set out in paragraph 75 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

*Second consultation:*

Please find post stage 1 comments in relation to energy, urban greening and air quality, attached and below, to be addressed.

### Energy

SAP calculations based on the energy mix should be provided. Evidence of correspondence with network operator to provide provisional agreement of decarbonisation with the Grange Farm Development network.

### Urban greening

A proposed roof plan has been provided which shows the location of proposed green roofs, and the minimum substrate depth of these roofs. This satisfactorily resolves our Stage 1 query.

A revised urban greening factor (UGF) of 0.35 for the proposed development has been submitted, which is lower than the UGF of 0.4 submitted at Stage 1. The applicant should seek to include measures to improve the UGF, such as intensive instead of extensive green roofs, and/or providing green walls, to improve the UGF of the scheme. If this is not possible, robust justification as to why the UGF has been reduced and does not achieve the target is required.

### Air quality

There has been no updated air quality information provided, so the comments in the Stage 1 response remain outstanding.

## **GLA Viability Consultant**

### *First consultation:*

Further clarification and additional information is required. This includes a full cost plan review and clarifications/ analysis on the sales value assumptions.

Based on the information provided and subject to the clarifications outlined above, it is likely that the scheme can deliver more affordable housing than the 10% currently proposed by the applicant. The S106 agreement should provide both early and late stage reviews

### *Second consultation:*

The new affordable housing offer is an increase from 10% to 24.65% at a tenure split 73:27, London Affordable Rent: Shared ownership.

An updated appraisal has not been provided, but the applicant's advisors, Turner Morum, has issued a document setting out several outstanding matters which is considered below.

Several key matters remain outstanding in respect of values and inputs and no updated appraisals have been provided.

The LPA's assessors previously concluded that the provision of 23% affordable housing would result in a modest surplus and their updated appraisal based on the revised affordable housing offer should be provided.

### **Transport for London**

At Stage 1, TfL recommended discussing arrangements with Waitrose as it would appear removing or adjusting individual parking bays could allow for improved pedestrian links between the store, the site and Grange Farm development. This appears to be tackled by provision or linking into pedestrian crossings within the Waitrose car park.

The latest transport report refers to adjustments to the pedestrian routes, footway width and crossing changes as part of the design, and changes to the mews block design to help ensure visibility and safety for cyclists and pedestrians. TfL recommended a Road Safety Audit of the proposed highway design, oversight of the audit is responsibility of the relevant highway in this case Harrow. The transport report doesn't say if the changes proposed are result of a RSA or specific discussion with Harrow highway officers. This should be confirmed.

At Stage 1 it was unclear how the on-site cycle route links into wider cycle routes. The latest transport report does not answer this request for clarity. Please can the applicant confirm how the on-site route ties into the wider network and if that goes beyond the immediate site boundary.

As requested at Stage 1, Delivery and Servicing Plan and Construction Logistic Plan should be secured by condition.

### **Environment Agency**

The previous use as a gas holders will have been a COMAH lower tier site, however these were de-notified a number of years ago. Therefore we have no comments with regard to this.

#### Land contamination

The site does not appear to be situated in a vulnerable groundwater area. Where land contamination may be an issue for a prospective development. Developers to employ specialist consultants/contractors working under the National Quality Mark Scheme.

It is recommended that the requirements of the National Planning Policy Framework and National Planning Policy Guidance are followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. We expect reports and Risk Assessments to be prepared in line with our Approach to Groundwater protection (commonly referred to as GP3) and the updated guide Land contamination: risk management (LCRM). LCRM is an update to the Model procedures for the management of land contamination (CLR11), which was archived in 2016.

### **Ministry of Defence**

*First Consultation:*

The MOD requests that a condition such as the one below be included in any planning permission granted to ensure that the MOD is notified of when and where cranes will be erected.

In conclusion, provided the maximum build height does not exceed 82.725m AODL and a condition is applied to any consent granted for the submission of a BHMP and a Construction Management Strategy then the MOD does not object to this proposal.

It is important that the conditions requested in this response are included in any planning permission granted as per Planning Circular 01/03: Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas, if Harrow Council decides to grant planning permission contrary to our advice then we must be notified 28 days prior to a decision being made.

### **Thames Water**

Thames Water would advise that with regard to surface water network infrastructure capacity, we would not have any objections to the above application based on the information provided.

Thames Water would advise that with regard to foul water sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

### **London Underground**

No comments

### **Chemicals, Explosives and Microbiological Hazards Division - Unit 5 (CEMHD5)**

This application does not fall within the Consultation Distance Zones of either a Major Hazard Site or Major Accident Hazard Pipeline.

The Health and Safety Executive (HSE) is a statutory consultee for certain developments within the consultation distance of Major Hazard Sites and Major Accident Hazard Pipelines.

When potential development sites are identified, if any of them lie within the Consultation Distances for either a Major Hazard Site or Major Accident Hazard Pipeline Council can use Web App which is HSE's on-line decision support software tool, to see how HSE would advise on any proposed development - <https://pa.hsl.gov.uk>



### **Secure by Design**

This development will require to achieve a Secured By Design (SBD) accreditation, the mere principles of Secured By Design is difficult to quantify, therefore only a SBD accreditation is acceptable as a planning condition to ensure that the right safety and security measures are incorporated, in order to keep the building and its occupants as safe and as secure as possible. There are concerns over some aspects of the proposed development.

The surrounding areas in and around Northolt Road and Grange Farm Close, in the immediate vicinity of this proposed development, has been subject to a number of organized criminal gang related incidents, over the last 10 years so access points between Grange Farm and the development should be reviewed. A number of other points have been raised relating to detailed aspects of the development and will be resolved via condition.

## **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 In this instance, the Development Plan comprises The London Plan 2016, The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan (AAP) 2013, the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan SALP 2013 [SALP].

5.3 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

5.4 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.

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

## **6.0 ASSESSMENT**

6.1 The main issues are;

- Principle of the Development
- Housing Output
- Environmental Impact Assessment
- Character and Appearance of the Area
- Residential Amenity, Quality, Noise and Accessibility
- Traffic, Parking, Access, Servicing and Sustainable Transport
- Development and Flood Risk
- Trees, Ecology and Biodiversity
- Sustainability and Climate Change Mitigation
- Land Contamination and Remediation
- Air Quality
- Aviation
- Secure by Design
- Statement of Community Engagement
- S.106 Obligations and Infrastructure

## **6.2 Principle of Development**

6.2.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan: 2.6, 3.3, 3.4
- Publication London Plan (2020): GG2, H1, E9, SD6, SD7, SD8

### Loss of retail use

6.2.2 The application site comprises three retail warehouses located within an existing large car park also serving another large superstore (Waitrose) which also shares the physical site (but is not within the redline boundary). The proposal seeks to demolish the existing superstores on site, which would result in the loss of 2,973sqm of Retail (Use Class A1) floorspace. This would then be replaced by the 191 residential units and ancillary services listed in the development description.

6.2.3 Retail is an identified town centre use. The NPPF (2019), The Publication London Plan (2020) and Harrow Local Policies all recognise the importance that retail plays in the vitality and viability of town centres. By reason of this, the policies at all levels seek to direct such uses into town centres. Furthermore, local policies, in accordance with the NPPF (2019), have identified town centre boundaries within Harrow and primary and secondary shopping frontages. Local policies seek to protect retail within these areas. The existing use is retail (Use Class A1) but is noted as not being within a designated business use area, designated town centre, or designated town centre parade. By reason of this (and although a

number of comments have been received objecting to the loss of the retail units), the employment floorspace is not protected by policy as it would if it were to be located within the locations listed above. Given the above, there is no objection to the loss of the retail Use (Use Class A1).

### Residential Use

- 6.2.4 The London Plan sets out to meet London's growth within 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 The Publication London Plan (2020) increases the minimum housing target to 802 homes per annum over the period 2020-2030. Policies SD6, SD7, SD8 and E9 of the (DLP)(ItP) seek to realise the potential of edge of centre sites (including existing retail parks) through mixed-use or residential development that makes the best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. Accordingly, the principle of the introduction of residential use on this out-of-centre site is supported. In accordance with Policy SD7 in particular of the Mayor's The Publication London Plan (2020), this net loss of retail floorspace to deliver housing intensification is considered to be acceptable.
- 6.2.5 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, in this case South Harrow. The proposed development would deliver 191 dwellings towards the boroughs housing stock and is considered a significant contribution that is welcomed.
- 6.2.6 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 South Harrow 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.

## 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,
- 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, 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, The 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 broader mix of affordable housing tenures will be appropriate and therefore provides a degree of flexibility based on the overall tenure mix. Policy H6 of the draft 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. At a local level, Harrow's planning obligations require that the Affordable units are split by tenure: 60% London Affordable Rent (LAR) to 40% London Shared Ownership / Intermediate (LSO).

- 6.3.6 The applicant proposes a 'without prejudice' affordable housing offer which would deliver 20% affordable housing (25% affordable housing provision on a habitable room basis), based on a tenure mix of 73/27% in favour of London Affordable Rent (LAR) product. The proposal would have the following tenure and mix:

**Table 1: Affordable Housing Mix**

	<b>Total Units</b>	<b>% of total</b>	<b>Total Habitable Rooms</b>	<b>% of total</b>
<b>London Affordable Rent (LAR)</b>	26	67%	91	73%
<b>London Shared Ownership (LSO)</b>	13	33%	34	27%
<b>Total</b>	39		125	

**Table 2: Tenure Mix**

*Affordable Housing Mix*

	<b>1B 2P</b>	<b>2B 4P</b>	<b>3B 5P</b>	<b>Total (units)</b>
<b>London Affordable Rent (LAR)</b>	5 (1 x accessible)	12 (1 x accessible)	9 (1 x accessible)	<b>26</b>
	19%	46%	35%	
<b>Habitable Rooms</b>	10	36	45	<b>91 (73%)</b>
	11%	40%	49%	
<b>Shared Ownership (LSO)</b>	6 (1 x accessible)	6 (1 x accessible)	1	<b>13</b>
	46%	46%	8%	
<b>Habitable Rooms</b>	12	18	4	<b>34 (27%)</b>
	35%	53%	8%	
<b>Total units</b>	<b>11</b>	<b>18</b>	<b>10</b>	<b>39</b>
<b>Total habitable rooms</b>	<b>22</b>	<b>54</b>	<b>49</b>	<b>125</b>
<b>Percentage Mix</b>	28%	46%	26%	<b>100%</b>

**Table 3: Total Affordable Housing Units / Habitable Rooms**

	<b>Total Units (entire scheme)</b>	<b>AH units</b>	<b>% of total</b>
<b>Units</b>	191	39	<b>20%</b>
<b>Habitable Rooms</b>	507	125	<b>25%</b>

- 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 76 units (40%) out of the 191 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 144 rooms to be provided as affordable rent. When taking the policy compliant split (60/40) into account by habitable rooms, this would require approximately 86 rooms to be provided as London Affordable Rent and approximately 58 rooms to be provided as an intermediate tenure.

- 6.3.8 The Council's Housing Officer has reviewed the offer by the applicants and notes that the scheme offers 39 Affordable Housing units which equates to 20% of the total units, which falls short of this borough wide target. The Mayor also requires Affordable Housing to be calculated by habitable rooms with a target requirement of 35% AH to be offered to qualify for fast tracking. As the scheme is offering 25% AH by Habitable rooms the applicant did not qualify for fast tracking and was required to provide a Viability Assessment which was assessed externally to prove the AH offer (39 units) represents the maximum reasonable AH achievable on the scheme.
- 6.3.9 The applicant submitted a Financial Viability Assessment (prepared by Turner Morum LLP) which was reviewed by the Council's external viability consultant (Avison Young, AY) as well as the Greater London Authority (GLA) respectively. On review, both the LPA's consultant and GLA found the initial maximum reasonable offer of 9% by unit and 10% by habitable room to be significantly lower than the threshold set by the Mayors The Publication London Plan and Borough wide target of 40%. The GLA required the applicants and LPA to also consider the following in subsequent negotiations:
- Full cost plan review and clarifications / analysis on the sales value assumptions;
  - AY should consider comments within the GLA Stage 1 report;
  - Profit assumptions should be reviewed given that "*The proposed scheme is a low rise development of up to 6 storeys and is relatively straight forward to deliver – this would indicate that the profit assumptions should be at the lower end of the standard range of 15-20%. There is no valid justification provided by the applicant that would indicate a profit requirement of 20%. AY have assumed a rate of 17.50% but this is also higher than we would expect to see taking into the larger and more complex schemes where this figure has been applied. A figure of 16.5% is considered more appropriate.*" (GLA viability comments);
  - It is likely that the scheme can deliver more affordable housing than the 10% currently proposed by the applicant; and
  - The S106 agreement should provide both early and late stage reviews.
- 6.3.10 Following discussions between both the applicant and the LPA's Financial Viability consultants, AY concluded that the scheme could viably afford 14% Affordable Housing (AH) (16.75% affordable housing in terms of habitable rooms) at a profit level of 17.5%, amounting to what is considered to be the maximum reasonable amount. Following this, the applicant put forward a 'without prejudice' offer which would deliver 20% affordable housing units (39 units) which would

equate to 25% affordable housing provision on a habitable room basis (125 habitable rooms). This would exceed what is considered to be the maximum reasonable Affordable Housing deliverable for this development as suggested by the Council's Financial Viability Consultant (AY). AY have confirmed that the offer would be appropriate. The LPA have accepted the increased offer put forward by the applicant as it would assist in the delivery of much needed Affordable Housing in favour of the priority tenure. The offer would also assist in weighing in favour of the scheme in terms of planning balance should it be resolved to grant permission and would be secured by way of legal agreement.

- 6.3.11 To assess whether the offer achieves the maximum reasonable Affordable Housing for the development, Harrow's Planning Obligations SPD requires a tenure split: 60% London Affordable Rent (LAR) to 40% London Shared Ownership / Intermediate (LSO). Based on the applicants offer it would therefore be required to achieve a split of 23 LAR / 16 LSO by unit to be compliant. However, the AH offered would comprise a total of 39 units; 26 LAR (equating to 67% of the units, 73% by habitable rooms) and 13 LSO (equating to 33% of the units, 27% by habitable rooms). Whilst not strictly tenure compliant, the weight towards LAR units the Council's greatest priority need would be met and on this basis is considered acceptable. Furthermore, the Council's target bed size mix for LAR units are for 2 and 3 bed units with a Person occupancy mix of 2b4p and 3b5p. There is also a requirement of 10% of these to be wheelchair adaptable. As demonstrated in Table 2 these requirements have been met and the Council's Housing Officer is satisfied that the affordable housing tenure mix offered would be acceptable.
- 6.3.12 All the LAR units would be located within Plot 03 of the proposed development which is preferable for the ease of management and service charging. These would be accessed via a single core which would only be shared with LSO units which would be acceptable. Policy T6 in the Draft London plan requires the provision of 1 designated wheelchair parking space to 3% of the total dwellings across the whole scheme (6 spaces). Housing Officers have requested confirmation of whether any LAR units would have allocated wheelchair spaces and if so, the siting in relation to the unit. An updated ground floor plan was provided showing where an additional disabled bay could be located in closer proximity to the LAR units resulting in a provision of 7 disabled bays. This should be included within the details submitted as part of a car parking design and management plan to be submitted to and approved by the Council.
- 6.3.13 On the basis of the above, the development offers above what is considered to be the maximum reasonable amount of Affordable Housing deliverable as advised by the LPA's Financial Viability Consultants, with a preferential balance of 2 and 3 bed London Affordable Rent units and on this basis is considered acceptable.
- 6.3.14 Notwithstanding, the above position, the applicant has agreed to the use of a review mechanism to be applied to any decision to grant permission. The use of both the early and late stage review mechanism is supported by the Mayor where schemes provide a lower than policy threshold quantum of affordable housing. This would enable the financial viability of the development to be re-appraised at

an appropriate time point (or points) during the course of the development to capture any additional affordable homes to be provided on-site, in the first instance, otherwise as a cash in-lieu sum for off-site provision. The values and inputs for these mechanisms have largely been agreed although there are some outstanding matters including the appropriate profit level to be applied which require further discussion. An early and late stage review has therefore been recommended, and this mechanism is included in the S106 Heads of Terms. Subject to such a clause within a S106 agreement to be attached to this permission, it is concluded that the proposal would comply with the relevant policies regarding affordable housing provision.

### *Housing Mix*

- 6.3.15 The London Plan Policy 3.8, 3.11 and 'The Publication London Plan (2020) policy H10 encourages new development to offer a range of housing choices in terms of mix and housing sizes and types. This is reinforced by Core Strategy Policy CS1 which requires new residential development to promote housing choice to meet local needs and to maintain mixed and sustainable communities. Development Management Policy DM24 states that *“the appropriate mix of housing will be determined having regard to the location of the site, the character of its surroundings and the need to optimise housing output on previously developed land.”*
- 6.3.16 It is noted that the proposed development seeks to deliver 93 x 1 beds, 70 x 2 beds and 28 x 3 beds. Whilst the Local Planning Authority is unable to prescribe a housing mix for market sale dwellings, it does seek to ensure there is an appropriate housing choice delivered within a scheme, which is in part informed by local evidence base. It is noted that the proposed housing mix is weighted slightly more toward the lower occupancy than desired. However, and noting the above inability to prescribe the mix, the application site is located within 350m of a town centre and previously developed land. By reason of this, it is reasonable that there would be a higher number of lower occupancy dwellings that in a more suburban location. Notwithstanding this as shown in Table 4 it is noted that there is still substantial amounts of larger units, which would provide a choice of family sized homes as well as the provision of on-site affordable housing weighted towards London Affordable Rent.
- 6.3.17 It is therefore considered that the provision of a range of unit sizes including family sized units as well as a mix of tenures would represent an appropriate housing mix akin to its sustainable location and development on previously developed land and in accordance with the policies mentioned above.

**Table 4: Housing Mix for entire development**

	<b>1B 2P</b>	<b>2B 4P</b>	<b>3B 5P</b>	<b>Total</b>
<b>Plot 1</b>	67	31	14	112
<b>Plot 2</b>	16	22	4	42
<b>Plot 3</b>	10	17	10	37
<b>Total Units</b>	<b>93</b>	<b>70</b>	<b>28</b>	<b>191</b>
<b>Total (%)</b>	<b>48.7%</b>	<b>36.6%</b>	<b>14.7%</b>	<b>100%</b>



## *Housing Supply and Density*

- 6.3.18 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 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 South Harrow sub area.
- 6.3.19 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.
- 6.3.20 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 central setting and has a PTAL of 4 although part of the northern area of the site also falls within PTAL 2, although accessibility is generally good in real terms given the site's close proximity to public transport links. When applying the density matrix within the London Plan (table 3.2), the proposal would equate to a density of 484 habitable rooms per hectare, which is considered to be appropriate at this location.
- 6.3.21 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.
- 6.3.22 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.

- 6.3.23 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.
- 6.3.24 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

- 6.3.25 The proposed development would bring forward 191 units of housing, 20% of which would be affordable (25% by habitable room) 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. As to the split of tenures, the application would deliver 5 x 1 bedroom and 21 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 73% of the required policy compliant offer on a habitable room basis, with the remaining 27% 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.
- 6.3.25 The delivery of 191 new homes (including the 39 Affordable Housing units above maximum reasonable 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 Environmental Impact Assessment**

- 6.4.1 The requirement of the Environmental Impact Assessment (EIA) Regulations 2017 is based on the likelihood of significant environmental effects arising from a new development and are divided into Schedule 1 and Schedule 2 applications under the EIA Regulations. Schedule 1 would normally constitute developments that would have significant effects on the environment such as major chemical projects or ground and air transport infrastructure. Schedule 2 consists of other forms of developments that are dealt with under a threshold approach. The proposals falls

under Schedule 2, Part 10 (b) relating to *Urban Development Projects* at the development includes more than 150 dwellings. Given the quantum of development proposed is considered to be EIA development.

- 6.4.2 The applicant requested an EIA Screening Opinion from the LPA (planning reference: P/0361/20) in accordance with Regulation 6 (1) and (2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations'). The accompanying EIA Screening Appraisal assessed the proposal against Schedules 1, 2 and 3 of the EIA Regulations and the Governments Planning Practice Guidance (PPG).
- 6.4.3 The LPA concluded that the development was considered not to be a development that triggered the thresholds, and therefore did not require an Environmental Impact Assessment to accompany it. It is noted that there have been amendments to the scheme, insofar as the design and layout. However, there has been little change to the intensity of what is proposed, insofar as unit numbers, vehicle parking, and the community centre. Therefore, it is considered that notwithstanding the amendments to the scheme, the proposed would still not trigger an Environmental Impact Assessment.

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

- 6.5.1 The relevant policies are:
- NPPF: Chapter 12
  - London Plan: 7.4., 7.5, 7.6, 7.7 and 7.13
  - Development Management Local Policies: DM1, DM7, DM22, DM23 and DM45
  - Publication London Plan: D1, D3, D11, D12, HC1
- 6.5.2 The surrounding area is mixed in character. The site itself comprises surface car parking and three large retail units with limited active frontage and urban design quality. The wider area is in flux with no prevailing or distinctive pattern of development. The area is characterised by a mix of uses including residential, industrial, hotel and retail. Notwithstanding this, the imminent redevelopment of the Grange Farm Estate directly north of this building is likely to transform the quality and setting of the wider context inherent to the existing transitional nature of the area.

### Emerging Context and Layout

- 6.5.3 Permission was granted on 29 March 2019 for the redevelopment of the Grange Farm Estate to the east of the site under planning reference P/3524/16. Consent was secured in 'Hybrid' form with detailed consent granted for Phase 1 and landscape proposals and outline consent for Phases 2 and 3. The consented development offers opportunities to improve connections around the South Harrow area, through improved pedestrian links and improvements to the variety of open space. The scale of the development respects the amenities and scale of the surrounding area, taking architectural cues from the sites 'Metroland' setting. These elements have heavily influenced the design and development of the current proposals increasing permeability and legibility across both developments, whilst complimenting the scale and design of the approved scheme and wider

context. To reinforce the need for consistency between the two schemes, Hawkins Browns Architects who designed the adjacent consented scheme were appointed to develop the current scheme proposals.

- 6.5.4 Progress has already been made for the implementation of Phase 1 of the approved scheme. Whilst Phases 2 and 3 (located closer to the subject site) have only attained outline consent, the siting and heights of these blocks have been agreed and will not be subject of the detailed reserved matters application. Accordingly, the proposed development will be assessed in terms of the emerging context in respect of the Grange Farm Development.
- 6.5.5 This scheme has been extensively developed through detailed pre-application discussions held with Officers, the Urban Design Officer and external design consultants. It was presented at two design review panels between March and April 2020. The Panel (DRP) support the proposal and judge it to be a high-quality scheme. Both the DRP and the Harrow urban design advisor made a number of recommendations for improvements throughout the process, and the design team have addressed all major points in this application.
- 6.5.6 The proposed development has been laid out to provide three distinctive blocks (Plots 01, 02 and 03) for the provision of residential use. The layout maintains the main customer, employee and service accesses to the existing Waitrose Store as well as the existing surface car parking spaces for the store, albeit would result in reconfiguration. Beneath the Waitrose store and surface car park between Brember Road and Northolt Road is a culverted river. A 5m exclusion zone is required to be maintained from the centreline of the culvert. Although this does not necessarily impact the proposed scheme heavily it sterilizes the southern tip of the site (end of the service road) from development. The layout and design are reflective of this.

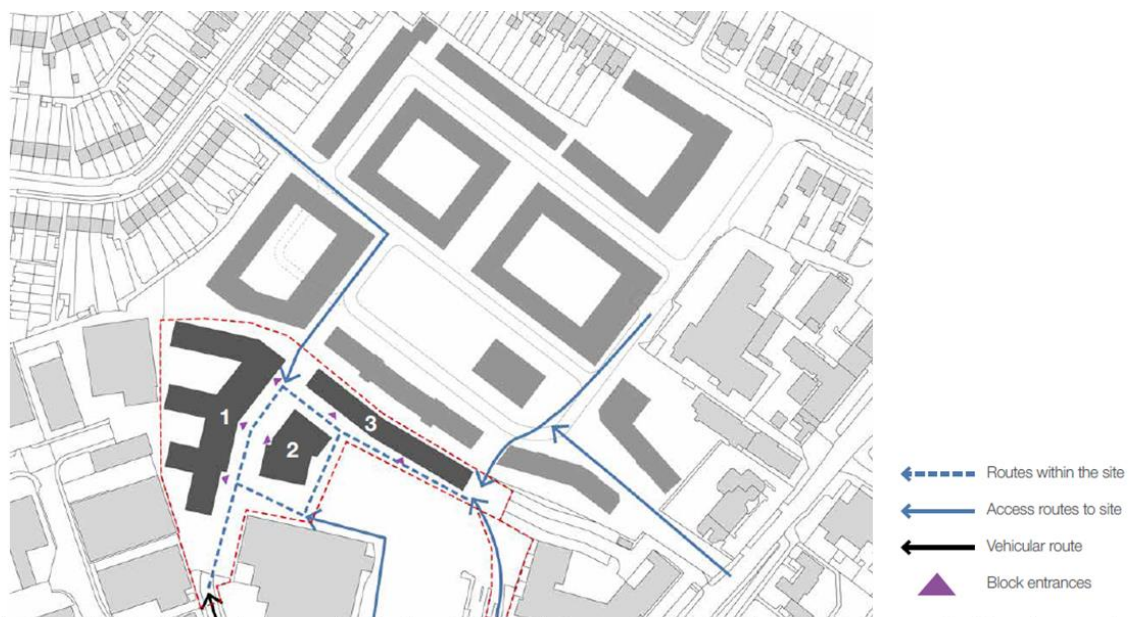


Image 1: Plot layouts in context of consented Grange Farm Scheme to the north (Design and Access Statement, Chapter 4.0)

- 6.5.7 The site has been designed to improve physical and social connections to the existing and emerging community. The south-west corner (via the existing service road) of the site is the main access to the development and would cater for pedestrians and cyclists as well as being the only vehicular access into and out of the site. This is because the surface level car park is located within Plot 01 on the western boundary which removes the need for vehicles to enter the site (with the exception of service and emergency vehicles), creating a predominantly pedestrianised environment. This is supported by proposed improvements to the existing service road including potential widening of the footway leading to the site, provision of zebra crossings and improved lighting to be secured as part of Section 278 legal agreement (discussed later in the report). These improvements would also improve safety within designated green and play space within the proposed development. Improvements to create a single access on the northern boundary, to provide less conflict between vehicles and pedestrians than the existing situation is considered acceptable for the provision of a secondary cycle route and pedestrian access to the development.
- 6.5.8 Opportunities to maximise wider connectivity have also been considered within the layout of the scheme, namely in the placement of key access points from Grange Farm and the siting of the main public spaces within the development. Key pedestrian routes to the Waitrose store and beyond towards South Harrow Station through the existing car park have also been identified. Whilst routes through the Waitrose car park are not encouraged, it is considered that the improved routes and access brought about by the development would detract occupiers and visitors from using this as a primary route, unless to access the supermarket.
- 6.5.9 The site is tightly bound by various constraints on the outer boundaries. Plot 01 seeks to extend the building line (although not adjoined) of the westernmost courtyard block of the Grange Farm development southwards into the site. The main street facing part of Plot 01 extends westward to present gable ends to the Brember Road Industrial Estate with a sequence of communal courtyards to buffer and minimise impact from the adjacent use. Plot 02 is centrally located within the development around which the circulation of the site is articulated. Plot 03 defines the northern boundary and street edge respecting and designed to modulate the emerging adjacent Grange Farm block approved, as reinforced in Image 1. All blocks would have active ground floor frontages and sufficient distances (between 11-22m) would be provided between the proposed blocks. A planted buffer extends around the car park edge, which would delineate a clear edge to the development from the Waitrose car park.

*Future development with Waitrose*

- 6.5.10 Although it is noted that the site currently shares surface car parking and access rights over the southern service road with the Waitrose site, this site is owned under a separate freehold. Discussions between the applicant and Waitrose have been had to ensure the current redevelopment would not preclude any wider redevelopment opportunities at the adjacent Waitrose site. Improvements to the connectivity and general layout have therefore been devised with the current access and servicing to the existing Waitrose store at the forefront.

6.5.11 The proposed layout is considered to be appropriate for the site. The layout includes the vehicular access points into the site, wider pedestrian and cycle routes to maximise connectivity beyond the site which have been carefully considered in relation to the functional requirements of the proposed residential use and car park re-provision. Officers are therefore satisfied that the proposal would achieve a high standard of development in relation to the layout considerations which safeguards for the existing and emerging context of the wider area.

#### *Scale, Massing and Design*

6.5.12 Three building types are proposed – Plot 01 (Linear), Plot 2 (Pavilion Block) and Plot 03 (Mews). Each would have a different character, material palette and design. The proposed blocks vary in scale from 4-6 storeys which is considered to be consistent with the existing and emerging context. This context comprises lower density development to the north and west (1-2 storeys); buildings up to 9 storeys directly south fronting Northolt Road and the emerging Grange Farm development to the east which will have a maximum height of 8 storeys. The heights have also been derived to respect the statutory safeguarding zones surrounding RAF Northolt as the site lies approximately 4.8km from the centre of the airfield. The site occupies aerodrome height, technical and birdstrike safeguarding zones. These safeguarding zones serve to ensure air traffic approaches and the effective operation of navigational aids and transmitters/receivers are not impeded. Any development within the site is therefore restricted to below the conical surface which is the area of protected air space. The MOD have been consulted and raise no concerns with the proposed height. The proposed height is accordingly considered to be sympathetic to the surrounding context.

#### Plot 01 (Linear)

6.5.13 It is noted that the industrial units and residential properties beyond on Stanley Road comprise mainly of 1-2 storeys. Plot 01 has therefore been designed sensitively to ensure high quality living accommodation for future occupiers and to respect the scale of the surrounding area. To the rear, the series of projecting wings create domestic scaled communal courtyard gardens that mediate in scale between the primary street block (6 storeys) and low-density boundary to the west by reducing the height of two of the wings to 4 storeys and southern-most block to 5 storeys. The wings are also staggered to align with the chamfer of the western boundary. The 6 storey wing to the north relates to the approved Grange Farm block (5 storey) adjacent with a minimum separation distance of 11.4m which is considered appropriate.

6.5.14 Plot 01 is also sited directly opposite Plot 02 although there is approximately 14m between them. This allows the linear street block to define the key routes through the scheme and respond to the natural desire lines of movement through the site. The ground floor units are characterised by large private amenity spaces as buffers between the streets and homes. This creates a good relationship with the street on a human scale as well as ample opportunity for natural surveillance. The

scale and mass have therefore been contrived to provide high quality of spaces within the plot but also respect the scale of the existing context to the west and emerging context to the north and is therefore considered acceptable. A series of inset balconies to the corners with clear corner posts, infill balconies within the massing recesses above communal entrances with some projecting cantilevered balconies (mainly to the rear of the block) are used to minimise the overall bulk of the development. The use of metal railings further reinforces this design approach.

- 6.5.15 In terms of elevational treatment, careful consideration has been made to create active frontages as far as possible. As such, the ground floor units have been designed laterally to frame the generous communal entrances to the apartments above. Whereas the entrances to the ground floor units are recessed as these are private. These units also provide screening to the ancillary accommodation of plant, cycle and bins as well as the podium car parking behind. The linear nature of this block is further accentuated by the regular fenestration arrangement and clear vertical emphasis. Pot 01 is proposed to comprise a reddish pink brick with light grey brick at ground floor level to define the entrances and frontages of the block which is consistent with the wider development.

#### Plot 02 (Pavilion)

- 6.5.16 Plot 02 is centrally located within the development. It is set in from Plots 01 and 03 by 12-14m and from the Waitrose store and car park by 13-18m. These large separation distances and its central location provide Plot 02 with greater flexibility in terms of scale. The block is 5 storeys in part facing the Waitrose site and main southern entrance and 6 storeys towards north and east of the site consistent with the adjacent proposed blocks. Plot 02 is smaller in overall mass than the other two and is viewed as a more sculptural and articulated 'building in the round' that acts as a physical focus and identity of the scheme. As such, it is experienced from all sides and addresses both the open aspect towards the car park and the new streets that loop around, through the use of private amenity gardens for the ground floor units served by individual entrances and a large central core accessed via the main communal entrance facing into the development. The smaller mass offers more opportunity for articulation of the facades comprising cantilevered balconies with some inset open corner balconies. This detailing is considered acceptable in the context of this plot. It is therefore considered that Plot 02 is comfortable in scale and mass both within the development and wider area.
- 6.5.17 As Plot 02 is located at the heart of the development, the brick proposed is a dark warm grey brick which is considerably darker than the other two plots. This is considered to provide greater emphasis and contrast visually against the other blocks, particularly when viewed from within the Waitrose car park and from the southern access. Furthermore, the use of an irregular fenestration arrangement with openings appearing as hit and miss and horizontal emphasis is considered to successfully provide architectural interest on all exposed elevations.

#### Plot 03 (Mews)

- 6.5.18 Plot 03 has a height of 4 storeys to the south east side and steps up to 6 storeys. This block directly fronts the Waitrose car park towards the west of the site and

replicates the mass of the approved 5-6 storey block at Grange Farm which runs parallel to the rear. Whilst the site itself is generally level, the Grange Farm site is higher (by approximately 1 storey), resulting in the height of the proposed blocks appearing lower and reducing the visual impact of the development from that side. The proposed 4 storey part of Plot 03 would have a separation distance of approximately 13.6m from the nearest Grange Farm block and would appear modestly as a 2-3 storey block from that side. The separation distance increases to 15.6m as Plot 03 increases to 6 storeys high (although this would appear as 4-5 storeys) from Grange Farm.

- 6.5.19 The design of Plot 03 has been developed to address the linear site boundary along the eastern boundary and has designed as a Mews Street, characterised by maisonettes at ground floor, each with their own front entrance. The street has been lowered and set back (by over 5m) to provide a visual buffer from the car park, although the street would be wide enough for Emergency vehicle access, and private defensible garden space to the front and planters / benches. The rear of the building has also been set back (by approx. 2.4m) from the shared boundary to provide private amenity space to the maisonettes. To reduce the overall massing of the block, inset open corner balconies and infill balconies within the building recesses above communal entrances have been provided. Projecting cantilevered balconies are kept to a minimal and are only proposed to the front of the block. Due to the appropriate separation distances, stepped roof height and level changes mentioned it is considered that the scale and massing of this plot is acceptable.
- 6.5.20 From an elevational treatment point of view, given the typology of the Mews block (Plot 03) and the siting of the building at the edge of the north eastern boundary, an articulated terrace style has been adopted. The first two floors comprise two storey, 3 bedroom maisonettes accessed via private entry courtyards. Separate expressed communal entrances for the floors above are provided for the upper floor units. The ground floor duplexes are highlighted with light grey brick and warm red / brown brick are proposed above. The simple flat roof design and stepped roof line is consistent with the scale and roof designs of buildings in the immediate vicinity. Openings have been provided either end of this block to avoid blank facades and to provide natural surveillance to the public spaces and main accesses to and from Grange Farm sited directly adjacent. The materials palette and architectural detailing are considered to reflect the nature of the typology proposed for Plot 03.

#### *Architectural Detailing*

- 6.5.21 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 wider area. 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.



6.5.22 In summary, Officers consider that the architects have developed a coherent design that also provides a varied yet consistent response to the different plots based on their individual typologies and site circumstances. It is considered that the elevations are simply designed with high quality brick details, balconies are alternated to the green link edge providing a more relaxed and playful appearance.

### *Heritage*

6.5.23 The London Plan Policy 7.8 and Policy HC1 of the Mayor's The Publication London Plan (2020) state that development should conserve heritage assets and avoid harm. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". The NPPF states that, when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

6.5.24 Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Any harm must be given considerable importance and weight.

6.5.25 The site does not contain any designated heritage assets nor is the site located within a conservation area. There are no statutorily listed buildings or structures in immediate proximity to the site, however the site is located approximately 350 metres from the Mount Park Estate Conservation Area, approximately 300 metres from the Roxeth Hill Conservation Area and approximately 360 metres from the Grade II listed 29-37 Horn Buckle Close. Due to the distance of the proposed development to the designated heritage assets, the proposed development's built form, and the relative scale and character of the surrounding urban form, it is not anticipated the proposed development would be visible in conjunction with the designated heritage assets and therefore would introduce no change to the respective settings of the heritage assets.

6.5.26 Having regard to the statutory duties in respect of listed buildings and conservation areas in the Planning (Listed Buildings and Conservations Areas) Act 1990, and NPPF requirements in relation to listed buildings, structures and conservation areas, Officers are satisfied that no harm will arise to the nearby designated heritage assets through the delivery of the proposed scheme. It is considered that the proposed development is generally sympathetic to the form and scale of the surrounding context, including the nearby designated heritage assets (as

considered above), and the scheme is considered to accord with the aforementioned policies.

### *Public Realm*

- 6.5.27 The proposal incorporates a comprehensive landscape and public realm strategy, as touched upon above and detailed further in the report. The proposed enhancements would be inclusive, attractive, well-designed and accessible with a fundamental focus on connectivity of routes both within and outside of the site. Furthermore, the aspect of the proposed buildings and provision of residential units on the ground floor 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. These reasons, officers are satisfied that the proposed public realm improvements would meet the objectives of the relevant policies.

### *Access*

- 6.5.28 The site currently lacks permeability primarily due to its current retail function as a purposeful destination rather than being an environment to dwell. The main route to the site is subservient to the roundabout along Northolt Road, and is not currently desirable for both pedestrians and cyclists. To enhance safety within the development car movements to the site are limited to the south and the car park entrance is located close to the main vehicular entrance to minimise vehicle movement within the site. Accordingly, the site is primarily pedestrianised except for managed servicing and emergency service access. This would be the main route into the development for pedestrians, cyclists as well. It is noted that this access, being primarily for servicing of the existing retail units is not designed for use by pedestrians or cyclists. As such, safety improvements to enhance the existing routes will be secured via Section 278 legal agreement in respect of highway works and through appropriate landscape strategies discussed below. The provision of pedestrian and cycle access from the Grange Farm Development via two main points either side of Plot 03 would also encourage wider permeability. One of these routes south of Plot 03 was secured as part of the consented Grange Farm scheme and the other, to the north is proposed as part of the current scheme.
- 6.5.29 Designated delivery/drop off and servicing zones are integrated into the street layout to facilitate this. The layout allows for emergency vehicle access directly on the streets, including via the Mews Street if necessary through the removal of bollards either end (through the use of fob key access). A segregated pedestrian and cycle route starts close to the existing petrol filling station east of the site in front of Plot 03 into the development.

## *Landscaping*

- 6.5.30 The existing site is limited in terms of landscaping, characterised by hard landscaping and scrub boundaries. The landscape masterplan is proposed to stitch in the new residential spaces into the wider context and complement the emerging Grange Farm masterplan to the north. The approach integrates routes, wayfinding, character and biodiversity to deliver what is considered to be a high quality setting for the new homes. The masterplan principles include the creation of legible streets, playful spaces, active frontages and amenity, multifunctional spaces and green and blue networks. It is noted that the revised plans resulted in the adjusted of the original red line boundary which removed a large area of landscaping on the eastern boundary of the site. Whilst this is a considerable loss to the scheme, this was mitigated through the increase in play space, re-provision of allotment space and a clearer boundary hierarchy. Furthermore, given the overall enhancement to the existing urban context and minimal vehicle movement within the site, this change is not considered to compromise the overall high quality design aspirations of the scheme.

## *Public Spaces*

- 6.5.31 In achieving a comprehensive and inclusive landscape strategy, consideration has been given to the approved Grange Farm masterplan. The Grange Farm masterplan creates a new community square with a variety of play and recreation spaces. The proposal seeks to complement and enhance this offer to create an extension to the regeneration of the area. Two key links either side of the Mews block (Plot 03) have been created to provide east to west (vice versa) movement across both the development site and Grange Farm. These 'arrival' nodes as well as the southern access area are characterised with a range of play space typologies including both urban and natural to encourage social activity within the shared street. Primarily the new public space at the heart of the scheme located at the centre point and is visible from all three blocks and Grange Farm. The main linear route via the main southern access provides a key vista and gives legibility to the hierarchy of routes. Orchard gardens are also proposed at the main arrival point comprising semi-wild and woodland planting to enhance biodiversity within the site. Linear gardens are proposed on the north west corner of the site to connect the allotment walks proposed at Grange Farm. Hard and soft landscape plans with detailed specifications of proposed planting and materials along with a management and maintenance strategy to ensure the longevity of the landscape proposals are considered necessary to safeguard the delivery of a high quality public realm.
- 6.5.32 In terms of boundary treatments, a combination of low brick wall and planted strips form the private gardens to the street, with integrated gates and bin/cycle storage. The car park boundary is also incorporated within the scheme through a series of raised planters, bench seating and visual and acoustic barriers (mainly for car park boundaries). This is particularly inherent in addressing the level changes adjacent to the Mews Street. Planting will also incorporate vehicle barriers and lighting bollards to create safe play and recreational space and allotment planters will form the edges to the new connections to Grange Farm as well as support the SUDs

strategy. The shared surface would be flush and cohesive as a single space open for users. Subject to conditions requiring details of all boundary treatments.

### *Private Spaces*

- 6.5.33 The range and quality of private amenity spaces is considered to be high. Doorstep play is encouraged through the use of wide frontages and recessed entrances to provide shelter on arrival. The podium courtyards within Plot 01 are private and shared amenity for residents of this block. The orientation of these maximises the south western siting. Play space has been designed to be safe and accessible for all, ensuring a road safety compliant street network through low planting, defensible barriers and legible surfaces.

### *Children's Play*

- 6.5.34 Policy S4 in the Mayors The Publication London Plan and policy DM28 require an on-site provision of facilities where a development would result in a net increase in child yield. Policy S4 requires at least 10 sqm of play space to be provided per child which would result in a requirement of approximately 694sqm. Applying the GLA Population Yield Calculator, the proposed development is expected to yield a total of 69 under 16's comprising 28 x 0-3 year olds, 28 x 4-10 year olds and 10 x 11-15 year olds. Based on the indicative child yield from the development, this would equate to a minimum requirement of 278 sqm of play space. The development proposes 630 sqm of play space.
- 6.5.35 The Council's Planning Obligations SPD, is informed by Harrow's PPG 17 Study and specifies that a standard needs to be set that is both aspirational and also achievable. For this reason, the quantity standard for children's play space within Harrow has been set at 4sqm of dedicated play space per child which would result in a requirement of 278 sqm. When assessed against the Council's own benchmark, the development would provide more than the required dedicated space equating to 630 sqm. The revised Landscape Strategy within the Design and Access Statement by Hawkins Brown Architects provides details of the proposed play strategy. The report identifies that the proposed development would provide play provision that would be integrated into the public and communal spaces. Although the scheme falls short of the Draft London Plan requirement it would exceed the local thresholds. Furthermore, the integration and improvements to connectivity between the extant Grange Farm scheme and the proposed development mean users of the proposed scheme can access the nearby amenity spaces (which exceeded threshold requirements for both Harrow and the GLA) at the time permission was granted (P/3524/16). The LPA consider the quantum of play space provided is acceptable for the reasons set out below.

### *Refuse Storage*

- 6.5.36 The supporting Design and Access Statement (DAS) sets out the refuse arrangement for each plot. The plans show that each of the buildings will have its own dedicated refuse store. All of the refuse stores can be accessed by the residents from the core via the lobby and by refuse collectors directly from the street. Plot 01 has three cores and refuse collection points, Plot 02 has one and

Plot 03 has two. All communal bin stores would be located in proximity of the road ensuring the dragging distance between the door of the store and the kerb line is less than 10m as required by the Council's Refuse Collection Code of Practice. The quantum of residual waste and recycling waste bins has not been provided for each building these would need to be provided in accordance with the Council's Refuse Collection Code of Practice, which requires a provision of 1 large bin per 8 flats. A condition requiring the outstanding details is recommended.

### *External Lighting*

- 6.5.37 In terms of external lighting, the applicant included a section relating to the proposed lighting strategy within the Design and Access Statement, which sets out that the external lighting would be designed to support the creation of a high quality public realm through safe, accessible and attractive streets and spaces as well as to protect biodiversity. Low level lighting is proposed for primary routes, to connect to external building entrances, bin and cycle stores. Opportunities to integrate concealed lighting into boundary treatments to light the surfaces along the paths and streets is also proposed. All luminance levels would need to be within the relevant recommended guidance. Whilst the strategy provides examples of luminaire types, the final equipment details and detailed external lighting designed would need to be secured by condition.

### *Fire Strategy*

- 6.5.38 The applicant submitted a concept fire strategy report which demonstrates that fire strategy has been considered during design development. All individual units are proposed to be provided with individual Grade D Category LD1 automatic fire detection and alarm systems alongside the Category L5 alarms for the common corridors and plant rooms. This would support a smoke ventilation system and provide early warning to any occupants located within these areas. These would be designed, installed and commissioned in accordance with BS 5839-6. Horizontal and vertical escape routes for each block have been identified with the provision of firefighting lifts and minimum stair width of 1100mm, main entrances lobbies ventilated and sprinkler system for residential units. The Mayor under his Stage 1 response requested that a revised Fire Statement is produced which would accord with Policy D12 (part B, 1-6) of the Mayor's The Publication London Plan (2020). Although an updated Fire Strategy has been provided, the GLA have not provided further comments. To ensure that appropriate fire strategies are in place and in accordance with Policy D12 an appropriately worded condition is recommended.

### **Conclusion**

- 6.5.39 In conclusion, the proposed development, subject to the imposition of appropriate conditions would achieve a high quality form of development which would be further enhanced by the landscaped strategy which will knit together with the wider masterplan. It is considered that the proposals would meet the high quality design and landscape aspirations in accordance with the policies listed under paragraph 6.6.1 of this appraisal.

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

- 6.6.1 The relevant policies are:  
National Planning Policy Framework (2019)  
London Plan: 3.5, 3.6, 3.7, 7.6 and 7.15  
Harrow Development Management Local Policies: DM1, DM2, DM27 and DM28  
Publication London Plan: D4, D5, D6 and D13

### **Residential Quality of future development**

- 6.6.2 In addition to the above policies, the Mayor has published a Housing SPG (2016) which sets out the detailed guidance on a range of matters relating to residential quality, incorporating the Secured by Design principles, and these form the basis for the assessment below. The use of these residential unit GIA's as minima is also reiterated in Appendix 1 of the Residential Design Guide SPD. This is reinforced under policy 3.5 of the London Plan and policy D6 of the draft London Plan. Each of the key standards are appraised below.

#### *Entrances and Shared Circulation*

- 6.6.3 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 new streets within the development. They would be visible from and would help to activate the new public realm within the proposed development. 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 a maximum of no more than 10 residential units per floor serving the core. The GLA noted in their stage 1 report that this would not accord with Standard 12 of the SPG, however given that all other plots would achieve the required 8 units per core and habitable rooms, on balance this is considered acceptable. The SPG also encourages communal corridors to receive natural light and ventilation where possible. All dwellings accessed via an internal corridor would receive some form of natural light and ventilation. Where possible gallery access to the proposed residential units has been provided namely in Plot 03 which are exposed to open air but covered by the decks above. The corridors are not excessively long. In this regard this element is considered acceptable.

#### *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 Plots 01, 02 and 03. 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.

6.6.5 The SPG requires built in storage space to be provided in all new homes. The proposal is shown to provide an adequate level of storage space for each of the units. To ensure compliance with this standard, it is considered necessary to secure this as a condition of any planning permission. The SPG also seeks adequate space and services to work from home. An indicative furniture layout is set out on the application drawings and this demonstrates that all of the flats would have space for a table. As such, each flat would have space flexible for dining and home study/work activities.

#### *Access*

6.6.6 Policy 3.8(c) of the London Plan relating to Housing Choice, requires 90% of homes should meet building regulations M4 (2) – ‘accessible and adopted dwellings’. Policy 3.8(d) will require 10% of new housing to meeting building regulations M4 (3) – ‘wheelchair user dwellings’. The proposals would provide 10% of residential units as wheelchair adaptable units and as such the proposals would be compliant with the required building regulations. A condition is attached to ensure compliance with the regulations.

6.6.7 The submitted applications documents confirm that 22 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 be acceptable in this regard.

#### *Private open space*

6.6.8 The SPG requires a minimum of 5sqm per 1-2 person dwelling and an extra 1sqm for each additional occupant. In the case of the studios, 1 bed and 2 bed units, these units would have a private balcony space which would exceed the required standard recommended in the SPG. All units are provided with adequate private amenity space in form of either balconies or terraces. Many of the ground floor units which are served with private garden spaces exceed the minimum threshold. This aspect of the proposal is therefore considered to be acceptable.

#### *Privacy*

6.6.9 The SPG calls for habitable rooms within dwellings to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces. Paragraph 2.3.36 of the SPG refers to yardstick separation distances of 18-21 metres between facing habitable room windows.

6.6.10 As a high density scheme there would inevitably be some overlooking relationships between homes within the development. Plot 01 generally provides adequate separation distances between habitable rooms. Although the 5 storey element and part of the 6 storey element facing Plot 02 has a reduced separation distance between 14-17m, these distances are common within higher density developments and would not warrant refusal. Although Plot 01 is only separated from the proposed Grange Farm block to the rear by 11.5m at its closest point, this

block has only received outline consent, with plot allocation and indicative internal layouts only. However, any potential overlooking issues have been overcome through the design process by providing deck access along the northern boundary rather than habitable spaces. Terraces and balconies are also oriented to face south, away from the Grange Farm development. This would ensure any forthcoming reserved matters application for the approved block would not be compromised as a result of the development. Some overlooking may occur between the 6 storey elements of Plot 01 and Plot 02 on the north eastern corner given the reduced separation distance of approximately 12m, however such distances are considered appropriate for this type of development and would not result in an unacceptable loss of privacy to future occupiers. All other separation distances would comply with the Mayor's SPG.

- 6.6.11 A number of the balconies and private gardens throughout the development would be sited adjacent to each other, or adjacent to neighbouring windows. However, as noted above the level of overlooking between the balconies would be an acceptable condition in regard to the high density scheme such as this.
- 6.6.12 As noted under the character and appearance section of this appraisal, the ground floor gardens and those units fronting the podium level would maintain sufficient defensible zones from the public realm to ensure the privacy of the occupiers of these units. Appropriate boundary treatments for all ground floor private amenity spaces will be secured by condition.
- 6.6.13 On balance, having regard to the high density nature of the proposal, which is consistent with the need to make effective use of this accessible edge of town centre site and recognising that those choosing to live in a high density development are likely to have different expectations about privacy, it is considered that the relationships between residential buildings would secure a standard of privacy that would be commensurately high for the vast majority of future occupiers.

#### *Dual Aspect*

- 6.6.14 The SPG seeks to avoid single aspect dwellings where: the dwelling is north facing (defined as being within 45 degrees of north); the dwelling would be exposed to harmful levels of external noise; or the dwelling would contain three or more bedrooms. The definition of a dual aspect dwelling is one with openable windows on two external walls, which may be opposite (i.e. front & back) or around a corner (i.e. front and side) and the SPG calls for developments to maximise the provision of dual aspect dwellings.
- 6.6.15 The applicant has sought to exploit opportunities where possible to create dual aspect dwellings (up to 78% of the total units). While this number is relatively low, it is noted that there are no single aspect, north-facing units proposed. Furthermore, as the scheme has been designed with a pedestrian / cycle / play street through its centre, meaning that single aspect units that overlook this street are still provided with a relatively quiet aspect. It is therefore considered that the single aspect nature of this development would be off-set by the good internal layout and circulation for each of the units.



## *Noise*

- 6.6.16 The SPG seeks to limit the transmission of noise between flats, and from lifts/communal spaces to noise sensitive rooms, through careful attention to the layout of dwellings and the location of lifts.
- 6.6.17 The majority of units within the blocks would not induce any noise transmission issues resulting from poor vertical stacking arrangements. In the case of the cores to the individual buildings a number of habitable rooms would be sited adjacent to the lift shaft. Whilst this is not ideal, in most cases due to site constraints, this is unavoidable. However, having regard to the fact the development would be a new build and therefore would be required to ensure that sufficient noise insulation is provided to meet Building Regulations. When considered against the requirement for thermal installation also, it is considered that sufficient level of noise mitigation would be achieved to provide a good level of accommodation for future occupiers.
- 6.6.18 Policy D13 of the The Publication London Plan states that the Agent of Change principle places the responsibility for mitigating impacts from existing noise (and other nuisance-generating activities or uses) on the proposed new noise-sensitive development. Furthermore, it states that development proposals: should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances; explore mitigation measures early in the design stage, with necessary and appropriate provisions, including ongoing and future management of mitigation measures secured through planning obligations; and separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, and insulation and other acoustic design measures.
- 6.6.20 A Noise Assessment has been undertaken. This calculates suitable glazing and ventilation specifications required for the development to be acceptable in terms of noise. Due to the proximity of the neighbouring industrial uses located to the west of the site, and the introduction of residential land uses within the proposed development, Policy D13 is applicable to the proposed scheme. The application sets out that this principle has been considered in the design development of the proposal, with units located within Plot 1, at the closest point, benefiting from triple aspect as well as two primary frontages facing away from the industrial estate. Furthermore, the proposals incorporate acoustic fencing along the western boundary, and the incorporation of solid balconies screening off at least 1.2 metres to ensure that the proposed amenity spaces would be of a good quality in respect of the acoustic environment.
- 6.6.21 The Noise Assessment states that the site is considered a 'low risk' when assessed against the ProPG guidance. Noise associated with the existing commercial use (Waitrose), such as fixed plant and equipment would result in low impact in line with BS4142:2014 guidance. The report concludes that subject to the recommendations included the site would result in good internal living conditions in respect of noise for future occupiers. A condition to safeguard the implementation of the mitigation measures proposed is therefore required.

### *Daylight and Sunlight*

- 6.6.22 The SPG (2016) states that “All homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen and dining spaces should preferably receive direct sunlight” (standard 32). Supporting paragraph 1.3.45 outlines that “An appropriate degree of flexibility needs to be used when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties as well as within new developments themselves. Guidelines should be applied sensitively to higher development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and the scope for the character and form of an area to change over time.” Local Plan Policy DM1 includes among its amenity considerations the adequacy of light and outlook within buildings (habitable rooms and kitchens).
- 6.6.23 The applicant has submitted a detailed assessment of the effects of the development on the daylight and sunlight amenity to occupiers of neighbouring residential properties; on transient and permanent overshadowing to existing amenity areas in the vicinity of the site. This is based on the Building Research Establishment’s (BRE) ‘Site Layout Planning for Daylight and Sunlight: A Good Practice Guide’. The assessment considers the quality of sunlight and daylight to the new residential dwellings. Two principal measures of daylight for assessing impact on neighbouring properties are used, mainly Vertical Sky Component (VSC) and No Sky Line (NSL). The methodology adopted is considered to be appropriate.
- 6.6.24 For the purposes of measuring the performance of habitable rooms within the proposed development, the assessment uses the Average Daylight Factor. This method measures how much sky can be seen from the window and converts the results into a percentage of annual probable sunlight hours received. The BRE guidelines recommend that ADF values of 1% should be achieved in bedrooms, 1.5% in living rooms and 2 % in kitchens. In assessing daylight to combined living/ kitchen/ dining rooms, where kitchen areas are located to the rear proportion of such rooms and would receive lower levels of daylight, these have been omitted from the calculations and the assessment is based on the habitable living area only. Hence an ADF target of 1.5% has been adopted.

### *Impact on consented Grange Farm Development*

- 6.6.26 The northern part of Plot 01 and Plot 03 would abut residential blocks approved as part of the Grange Farm redevelopment. As the Grange Farm Estate only has outline consent there is no detailed design of the interior spaces or size of windows. An ADF assessment would normally be considered when these detailed design elements are known, however these details are not known, a Vertical Sky Component (VSC) was undertaken of the facades of the property, most likely to be impacted by the proposed development. The study concludes that at ground level, the façade can achieve at least 15% VSC as a result of the Northolt Road scheme built in the emerging context and as such the requisite Average Daylight Factor

(ADF) targets could be met, subject to appropriate design of the layouts, façade and balcony arrangement. As such, it is considered that both the proposed development and Grange Farm Estate schemes could, through detailed design, achieve adequate daylight levels that conform with current BRE guidelines.

*Impact to future occupiers of the proposed scheme*

- 6.6.27 In terms of sunlight, 43% of windows would meet the BRE Guidance for APSH. The lower compliance rate is mainly due to the northerly aspect of these rooms. However, on balance, having regard to the wider scheme benefit delivered and the overall quality of the units in terms of their size and internal configuration, the proposal is considered to be acceptable.
- 6.6.28 The sunlight levels to external courtyards, boundary with Grange Farm, shared surface and private gardens have been tested against the BRE guidelines. The results show that on the 21<sup>st</sup> of March that all outdoor spaces would achieve more than 50% of direct sunlight for a minimum of 2 hours. When assessed for 21 September, all of the external courtyards would receive more than 50% sunlight for a period of 2 hours. In June the analysis shows all external areas would receive over 90% of direct sunlight. This demonstrates that each of the courtyards will receive good sunlight amenity throughout the summer months when they are most likely to be used.
- 6.6.29 In conclusion, Officers consider that whilst clearly it is desirable for a new development to achieve 100% compliance with the recommendations of the BRE guidelines, it is inevitable that a site of the proposed density will require consideration of some compromise between daylight/sunlight, the provision of highly valued residential amenity space (balconies) and other planning considerations that may influence the site layout and orientation of buildings. It should also be emphasised here that the recommended BRE guidelines for daylight and sunlight – whilst a valuable tool for measuring the degree of daylight and sunlight that would be achieved – do not form a part of the adopted development plan. Rather, Local Plan Policy DM1 requires a high standard of amenity and undertakes to have regard to a range of amenity considerations which includes, but is not limited to, the adequacy of light and outlook. Thus, it is concluded that the proposed development would achieve above the recommended BRE standards, as a whole and is therefore acceptable.

## **Impact on Surrounding Residential Properties**

*Impact to daylight and sunlight*

- 6.6.30 Residential properties nearest to the site is the existing Grange Farm Estate comprising 68-73, 74 and 74 Osmond Close and 64-72, 73-81, 82-90, 91-99, 100-108, 109, 110, 111-116, 117 and 118 Wesley Close. In relation to sunlight, the report concludes that the proposal would accord with default BRE guidance and all neighbouring properties will continue to receive excellent sunlight amenity after the development. Generally daylight impingements would be small although there are some exceptions from the current BRE daylight guidance to a number of properties. However, this is because the existing massing on site is modest and

there are large vacant areas. As such, some noticeable reductions in daylight amenity would be inevitable with any scheme which optimises the potential of a site. Nevertheless, the consultants conclude that the amenity to all surrounding properties would remain good post development and compare favourably with appropriate urban daylight levels.

#### *Visual Impact, Outlook and Privacy*

- 6.6.31 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.
- 6.6.32 The nearest properties are located at Wesley Close which are approximately 18m away from the site / development. Evidently, at six storeys, the proposed buildings would be large, and would appear as such from the rear gardens of the respective residential properties. While the view would be softened through an extensive landscaping strategy, it should be noted that these properties form part of the emerging context albeit latter phases of the Grange Farm redevelopment which will see the construction of blocks up to 7 storeys high. Furthermore, the change in levels (by approximately 3m) would reduce the visual impact of the development and would positively mitigate the perception of bulk and massing, albeit in a modest way. All other uses in the immediate vicinity are commercial uses and whilst the development would be visible from residential properties which surround, it is considered that the visual impact of the development would be in keeping with the emerging scale and density of the wider area.
- 6.6.33 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.

## **Conclusion**

6.6.34 In conclusion, based on the above considerations, and the imposition of appropriate conditions, it is considered that the development would achieve a high standard of quality of accommodation for future occupiers in line with the guidance and policies noted under paragraph 6.7.1 above.

## **6.7 Traffic, Parking, Access, Servicing and Sustainable Transport**

6.7.1 The relevant policies are:

- National Planning Policy Framework (2019)
- London Plan: 6.1, 6.3, 6.9, 6.13
- Publication London Plan: H15, T2, T4, T6, T6.1, T6.3 and T6.5
- Harrow Core Strategy (2012): CS1R
- Harrow Development Management Local Policies: DM42, DM43 and DM44

### **Transport Impact**

6.7.2 This location has a public transport accessibility level (PTAL) of 4 which is considered to be good. There are numerous buses within a 400m walk and South Harrow Underground station is also a similar distance from the site. Northolt Road has a long retail parade functioning as a high street with various food stores, restaurants and other local amenities.

6.7.3 A Transport Statement prepared by Ardent Consulting Engineers was submitted in support of the application. The transport assessment states that Census 2011 records show that for flats within the Roxbourne ward, there is an average of 0.6 vehicles per household. Whilst this site does not sit within a CPZ it does border with both zones M (operating Mon-Sat 10-11am and 2-3pm) and M1 (operating Mon-Sat, 10am to 9pm). Residents of this development will not be eligible for permits however they would be able to park in the zone outside of the hours of operation.

### **Car Parking Provision**

6.7.4 For the application site (outer London and PTAL 4), The Publication London Plan sets a maximum residential parking provision of 0.5 car parking spaces per unit. The proposal includes car parking for 67 vehicles which amounts to 0.35 spaces per household. Of these 7 would be disabled (representing 3% of the total number of units in line with the Policy T6.1 of The Publication London Plan. No visitor parking is provided. The proposal would not result in a loss of any of the existing Waitrose car parking spaces. Although this provision is low, both Council Highways Officers and the GLA consider that this would help to encourage more sustainable travel. The Highways Officer states that car ownership would need to be discouraged and good access to good quality pedestrian and cycle facilities would be required. This is also encouraged by the GLA within their Stage 1 response. The applicant has confirmed several improvements to the existing service road access point by way of S278 legal agreement discussed later in this section (paragraph 6.7.22).

- 6.7.5 The parking survey summary indicates that parking demand is at its highest overnight although there is still capacity. On this basis, the proximity of the site to the zone M CPZ areas means that should there be insufficient capacity within the residential car park, it is likely that there would be overspill on to the surrounding roads. As residents are not eligible for parking permits, in order to achieve the low car intentions and to prevent harm to the highway in the form of parking congestion, it is recommended that further studies are undertaken by the Council following occupation of the site with a view to introducing longer hours of operation of Zone M, should this be necessary. This will be secured by way of legal obligation.
- 6.7.6 The Highways officer considers the car parking design and management plan (CPDMP) is acceptable; but would require a detailed document to be secured by condition. This needs to set out where the 3% disabled parking spaces are within the car park and where a further 7% of standard bays are located that can be converted should demand increase and how this will be undertaken. Additionally, it should set out how the passive EV charge points will be made active should demand increase. The intentions at paragraph 4.3 of the CPDMP need further consideration; as not all blue badge holders would require a wheelchair accessible home therefore, it may not be appropriate to restrict the provision of disabled parking spaces on this basis as the type of accommodation a person occupies doesn't necessarily reflect their parking needs. The outline construction logistics plan is acceptable. A detailed plan must be secured by pre-commencement condition. This must follow TfL/CLOCS guidance.

### **Access and Street Layout**

- 6.7.7 The development results in a significant reduction in trips which is to be expected following the removal of retail outlets. The low parking provision also helps to reduce vehicular activity further. The revision of the red line boundary during the application process on the eastern side of the site at the main retail park entrance has resulted in a change to a single lane from the roundabout. The development site has rights over this access and as such this route would also form an emergency access route to the site. This LPA Highways Officer considers the reduction in the number of lanes a positive for pedestrians using the supermarket in particular, as it would mean less opportunity for conflict given that all vehicular movements are concentrated into a single area.
- 6.7.8 Although it is noted that as a result of the revisions no dedicated pedestrian / cycle routes would be included to access the development from the northern points, routes are available via the Waitrose car park and measures would be secured to encourage access via the main southern route. As such, key routes linking the development to Grange Farm would not be compromised. Given the positive improvements to the safety of this access through the provision of a single access it is considered on balance that this route would be acceptable. To ensure suitable pedestrian/cycle safety a cycle gate is proposed at the eastern end of Plot 03 (Mews), to ensure cycles slow down before entering the access road.

- 6.7.9 The Transport Consultant has confirmed that the main desire paths to and from South Harrow on Northolt Road to the south of the site would be via the main southern access point. Furthermore, to encourage sustainable travel within and beyond the development a number of improvements to the southern access (currently used only as a service route) would be secured via Section 278 works and which have been confirmed by the Council's Highways Officers, these include: Improvements and potential widening to the footway on the southern side of the access road leading to the site; provision of a zebra crossing for pedestrians linking the footpath to Stanley Road; improved lighting to the footway link to Stanley Road and a provision of a car club space. The implementation of these measures would ensure the safety of all users using this route.
- 6.7.10 The Active Travel Zone (ATZ) assessment reviewed the connections to key destinations and identified that there are no significant issues meaning that pedestrian access is good. Improvements to lighting could enhance the cycling connection to the nearest cycle route in Roxeth Green Avenue; this can be explored by the Council, should the application be approved, particularly to consider connections to other nearby routes. The Highways Officers have confirmed that these discussions could take place should the application be approved. The GLA requested confirmation regarding cycle routes to the wider area, the applicant has confirmed that the internal layout of the site has been designed to allow future links to cycle routes if/when these are available, and further detail on any off-site improvements required to link to any cycle infrastructure in the vicinity would be picked up as part of the Section 278 agreement.
- 6.7.11 Swept-path analysis has been undertaken of the internal highway network and parking areas with a standard design vehicle. The TA contends that a Stage 1 road safety audit was undertaken on the proposed highway layout and no major concerns were highlighted. The GLA requested that a collision analysis should be undertaken to ensure that the scheme aligns with the Mayor's Vision Zero Action Plan. The applicant has confirmed that the Road Safety Audit recommendations largely related to issues which would be picked up as part of the detailed design and would be included at that stage as well as being considered as part of the Stage 2 Safety Audit. This will be secured by condition. However, given that it is anticipated that the proposed internal roads would have relatively low vehicle movements per hour and managed through the use of bollards and fob access it is not considered that the proposed development would raise significant safety concerns.

### **Cycle & Motorcycle Parking**

- 6.7.12 Cycle parking requirements are based on the minimum standard set out under policy T5 of the draft London Plan. The proposal would provide 331 long stay cycle parking and 6 short stay cycle parking. 5 per cent of the total long stay provision will be in form of wider spaced Sheffield Stands and adapted cycles; 20% of spaces within the standard Sheffield Stands and remaining 75% provided as tiered-stands, which will be gas assisted.

- 6.7.13 All long stay cycle parking will be provided in secure and covered locations in line with policy T5 of the draft London Plan and the London Cycling Design Standards. All short stay cycling will be situated within the public realm in visible, convenient locations, which will be step free and within 15m of the main entrance of their allocated residential core or non-residential unit. Confirmation and details of appropriate cycle stands and adequate space within the designated areas would be required to ensure compliance with The Publication London Plan (2020) and London Cycle Design Standards. A condition is therefore recommended.
- 6.7.14 Policy DM42 sets out that 1 motorcycle parking per 20 car parking spaces should be provided to all developments with more than 10 car parking spaces. Based on the quantum of parking proposed, this would require a quantum of 3 motorcycle spaces to be provided for this development. The proposed ground floor plan indicates that a provision of 4 spaces could be accommodated. The exact detailing of the proposed motorcycle can be secured by condition spaces to ensure these are adequately sited and provided for.

### **Travel Plan**

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

### **Car Club**

- 6.7.16 The applicant's TA sets out that there would be no car club provision although there are two car club vehicles stationed within walking distance to the south of the site. The applicant states that residents will be made aware of the benefits of membership to the established neighbourhood car club network. However, further discussions with the Council's Highways Officer resolved that a car club space should be provided which would further encourage sustainable travel for future occupiers. This was agreed by the applicant and will be secured by way of legal agreement, details of which finalised during the drafting of the Section 106 to ensure uptake of this space.

### **Deliveries and Servicing**

- 6.7.17 As noted the development is likely to result in a significant reduction in trips given the loss of the retail units. It is still considered that up to 35 servicing trips per day associated with this development would be expected. The development proposes a parcel drop off/locker facility which is considered to be acceptable as it would reducing the likelihood of repeat journeys through missed visits. A delivery and servicing plan has been provided and this sets out how these visits are intended to be managed.



- 6.7.18 Dedicated servicing areas are provided close to cores/bin stores on site, with delivery and service vehicles able to pass whilst a refuse vehicle is waiting. The Mews block (Plot 03) being wholly pedestrianised (with the exception of emergency access) would have refuse stores located to the northeast with waste holding areas close to residential units to achieve suitable carry distances. The Delivery and Servicing Management Plan states that an onsite management company would assist with deliveries and servicing.
- 6.7.19 It is noted that the main access to the site would cross paths with the operations of the Waitrose Store. The Transport Consultant has confirmed that servicing for Waitrose does take place from the southern access road, but entry/egress are in forward gear, and suitable visibility splays are achievable. Furthermore, the Transport Consultant states that low numbers of delivery/servicing movements take place at the Waitrose site which would limit the opportunity for conflict and as such this would not compromise the existing operation of the store or the future safe accessibility to the proposed development, particularly in the context of the Section 278 works proposed. On this basis, it is considered that this element would be acceptable subject to a condition securing the assessment and measures outlined in the submitted delivery and servicing plan.
- 6.7.20 Emergency Vehicles has been considered in the design of the proposed development. Fire tender vehicles are able to stop within 18m of each external riser inlet and clear routes have been provided to ensure unobstructed access in the event of an emergency.

### **Highway Works and Mitigation**

- 6.7.21 The proposed off-site highway works would consist of:
- Improvements and potential widening to the footway on the southern side of the access road leading to the site;
  - Car club space provision;
  - Provision of a zebra crossing at grade for pedestrians linking the footpath to Stanley Road; and
  - Improved lighting to the footway link to Stanley Road.
- 6.7.22 As detailed above, various strategies are proposed to mitigate the impacts of the proposed development. In addition to the provision of a designated the cycle stores for the proposed residential development, a 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). 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.

## Conclusion

6.7.23 In conclusion, it is considered that the proposed development, subject to the imposition of appropriate conditions and/ or section 106 obligations would have no adverse impact up parking or highway safety and consequently would give rise to no conflict with the policies stated under paragraph 6.7.1 above.

## 6.8 Development and Flood Risk

6.8.1 The relevant policies are:

- NPPF: Chapter 14
- London Plan: 5.12 and 5.13
- Harrow Core Strategy: CS1 U
- Harrow Development Management Local Policies: DM9, DM10 and DM12
- Publication London Plan: SI 12 and SI 13

### Flood Risk

6.8.2 The applicant submitted a Flood Risk Assessment (FRA) for this site. The entirety of the site and surrounding areas are shown to be within Flood Zone 1 i.e. land having a less than 1 in 1,000 annual probability of fluvial or tidal flooding. The FRA confirms that there is negligible risk of tidal flooding. However, a small portion of the eastern part of the site is identified within surface water flood zone 3a & 3b according to the Council's surface water flood maps. There is also a piped watercourse located within the site. Part of the site is therefore at a highest risk of flooding.

6.8.3 An FRA was submitted in support of the application and has been reviewed by the Council's Drainage Authority and they requested further information all of which were supplied by way of Flood Risk addendum. The updated information included:

- calculations for volume of compensation storage required;
- location of proposed CFS on plan
- cross section of the proposed compensatory flood storage with levels of the existing and proposed / lowered ground level in relation to the finish floor level.
- Detailed floor mitigation measures taking into account the depth of flooding.
- Emergency planning information
- Permeable paving;
- Drainage strategy; and
- Further details relating to the impact on the piped watercourse.

6.8.4 It is noted that there is a piped watercourse which cuts across the entire retail park and thereby part of the development of the site. The original design included with the Flood Risk Proposal showed all buildings greater than 5m from the culvert, however, did show both permeable paving and the attenuation crates 3-5m from the culvert. To avoid any conflict these, have both been moved so they are outside the 5m easement to the culverted watercourse, even with the survey provided.

The FRA confirms that any planting within the vicinity of the culverted watercourse will be within raised planters or trees to avoid roots impacting the culvert.

- 6.8.5 In response to the above, the applicant's Drainage Consultant has provided a Technical Design Note in response to the above LBH comments, which sets out that the proposed surface water drainage system for the site already provides an appropriate form of surface water 'compensatory flood storage', with no further compensation therefore considered necessary. Furthermore the proposals would include 'rain gardens' and other soft landscaping which will provide additional form of surface water 'compensatory flood storage'. The provision of a surface water drainage system designed to ensure there is no on-site water flooding post development would negate the need to raise floor levels 300mm above the flood level.
- 6.8.6 The Council's Drainage Authority confirms that points addressed in the addendum are sufficient subject to conditions requiring full design details of escape route (an alternative route to the north should be marked on plan) and watercourse protection condition (discharging surface water to the watercourse which requires Council consent).
- 6.8.7 Subject to these conditions and given that Mayor's Stage 1 response raises no concerns with the submitted FRA the proposal is considered to satisfy the requirement of the policies set out under paragraph 6.10.1 above. In addition, the

### **Drainage Strategy**

- 6.8.8 Policy 5.13 requires a surface water drainage network to utilise sustainable urban drainage techniques, discharging surface water at greenfield runoff and managing surface water as close to source as possible in line with the drainage hierarchy set out under this policy. The applicant has submitted a Drainage Strategy (DS) which has been developed in accordance with policy 5.13 of the London Plan and policy SI 13 of the draft London Plan. 6.11.4
- 6.8.9 The DS in line with the hierarchy will include storage water for later use by way a planting strategy with water butts at grow areas and opportunities for water run off to provide irrigation to podiums and private gardens, permeable surfaces, proprietary below ground attenuation which supports the permeable surfaces and soft landscaping and living roofs designed to work with PV array. The EA's Surface Water Flood Risk mapping shows that majority of the site to be at 'low risk' of surface water flooding and this is reiterated within the FRA. The aforementioned SUDS strategy can be summarised below:
- Living roofs
  - Tree pits
  - Water butts
  - Geo cellular storage; and
  - Permeable paving.

### **Conclusion**

6.8.10 It has also been recommended that details of the foul water disposal system 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. The Mayor's Stage 1 response makes no comments on the flood risk element of the scheme. Accordingly, subject to conditions, the proposal would accord with the relevant policies in this regard.

## **6.9 Ecology and Biodiversity**

6.9.1 The relevant policies are:

- National Planning Policy Framework
- London Plan: 7.19
- Harrow Development Management Local Policies: DM20 and DM21
- Harrow and Wealdstone Area Action Plan: AAP12
- Publication London Plan: G6

6.9.2 The applicant has submitted a Preliminary Ecological Appraisal in respect of this application. This notes that the site is not designated for its nature conservation value and its not lie within the impact risk zone of Ruislip Woods SSSI. As such it is considered that the site is located sufficiently far from any priority habitat areas and designated conservation sites to conclude that the proposal would have no direct impact on these.

6.9.3 The Council's Biodiversity Officer has reviewed the information and considers the submitted Preliminary Ecological Appraisal (PEA) to be satisfactory. The site is within an area that is generally deficient in opportunities for access to nature but lies within 2 kilometres of a number of local wildlife sites including the extensive Harrow of the Hill Borough Grade 1 SINC. The PEA does not consider the site within the context of this wider local ecological network nor does it give consideration to the Mayor's Urban Greening Factor (although this is addressed within the Design and Access Statement). There are a number of concerns raised by the Biodiversity Officer in relation to the information supplied in relation to the exact amount of net biodiversity gain. However, as outlined within the PEA a number of recommendations have been made within the PEA to address this including:

- Native tree and shrub planting;
- Inclusion of green roofs (revised proposals include on all blocks);
- Bat boxes; and
- Inspect boxes.

6.9.4 Whilst the Council's Biodiversity Officer has acknowledged the above conditions have been outlined to make the scheme acceptable in planning terms, by ensuring that it will have a positive impact on biodiversity to ensure that the applicant outlines and commit to the implementation of detailed proposals in this regard.

## Conclusion

6.9.5 Subject to the imposition of the conditions recommended above, it is considered that the proposal development would meet the aspirations of the policies listed under paragraph 6.9.1 above.

### 6.10 Sustainability and Climate Change Mitigation

6.10.1 The relevant policies are:

- National Planning Policy Framework
- London Plan: 5.1, 5.2, 5.3, 5.4A, 5.7, 5.9, 5.10, 5.11, 5.15, 5.18, 7.6 and 7.7
- Harrow Core Strategy: CS1 T
- Harrow Development Management Local Policies: DM1, DM12, DM13 and DM14
- Publication London Plan: D7, D8, G5, S1 2, SI 3, S1 4, SI 5 and SI 7

### Energy and Sustainability

6.10.2 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 contribution 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'. The applicant has submitted an Energy Strategy Report (Dated 12<sup>th</sup> June 2020).

6.10.3 The Energy Strategy sets out carbon savings beyond Part L of the Building Regulations. The Energy Strategy sets out the energy hierarchy as detailed within The Publication London Plan (2020) being; Be Lean, Be Clean, Be Green and Be Seen. This does detail that the proposed development would achieve 9% savings through energy efficiency measures. However, policy SI2 (Minimising greenhouse gas emissions) The Publication London Plan (2020) requires 10% to be achieved. Therefore there is minor non-compliance with this requirement. However, it is noted that the overall saving would be 43% on site which is in excess of the required on-site savings of 35%. Therefore, and notwithstanding the minor non-compliance, the proposed development would achieve a satisfactory on-site savings for a residential development.

6.10.4 The applicant notes that there is a Combined Heat Pump unit within the permitted Grange Farm scheme, which is directly adjacent to the application scheme. The permitted Grange Farm energy centre would be delivered in Phase 2 of that development and is expected to be operational in 2024. By reason of this, the submitted energy strategy proposes that the Northolt Retail Park redevelopment connects the permitted energy centre within the Grange Farm development. The applicant has proposed an interim strategy to be utilised until such time (likely 2024) as the development is able to be connected to the Grange Farm heat

network. This approach is supported by Policy S13D(a) and is therefore encouraged and will be secured by way of condition. Evidence of discussions between the applicant and the network provider at Grange Farm have been submitted which suggest that a connection between the two sites would be feasible. The GLA have also suggested a condition is secured should the connection to the Grange Farm district heating network not be achieved within 5 years of occupation of the development to the temporary gas boiler energy centre proposed with a LZC heating technology that will meet the 35% on-site carbon reduction target for the development.

- 6.10.5 The GLA reviewed the energy strategy and provided their comments as part of the Stage 1 response. Further information was required in respect of a number of elements of the energy strategy to ensure compliance with the London Plan and Mayor's Publication London Plan (2020). This included information in relation to the decarbonisation strategy, Be Clean, Be Lean and Be Green elements, carbon performance and offsetting. Detailed technical comments in respect of energy have been circulated to the Council and applicant under a separate cover to be addressed in their entirety. Following the submission of further details the GLA notes: "The energy strategy is generally compliant with the London Plan policies. The carbon dioxide savings meet the on-site target set within the London Plan for domestic uses, however, the applicant is required to submit the additional information, which has been requested below. The applicant will be expected to review the 'Be seen' energy monitoring guidance early in the design process to ensure that they are fully aware of the relevant requirements to comply with the 'be seen' policy. A commitment should be provided that the development will be designed to enable post construction monitoring and that the information set out in the 'be seen' guidance is submitted to the GLA's portal at the appropriate reporting stages. A revised Energy Strategy will be requested to resolve outstanding matters as suggested by the GLA. Furthermore, post construction monitoring would be secured by way of legal agreement.
- 6.10.6 As the development would not be able to achieve the 'zero carbon' requirement on site, the remaining 131 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 £237,600 (note: The higher rate is likely to apply given the status of the Publication London Plan (2020). Subject to appropriate conditions and the necessary planning obligations, the proposal is acceptable in this regard.
- 6.10.7 Given the above, it is considered that the proposed energy strategy follows the energy hierarchy as required by the London Plan. It achieves greater on-site carbon reductions than the minimum 35% required under the London Plan (56.4% residential / non-residential). The proposed connection to an existing (under construction) CHP-led heat network is considered acceptable given the history of the site and its ongoing development. Solar PV as a form of renewable energy is considered appropriate to the site. Any remaining residential carbon emissions will be offset by way of a monetary contribution, secured through s106 agreement. Implementation of the energy strategy should be secured by way of condition, with the development to be implemented 'generally in accordance with' the strategy to allow some flexibility as the scheme progresses through detailed design and construction phases.

## **Water Efficiency**

- 6.10.8 The Energy and Sustainability Statement also outlines several broader sustainability measures, including water efficiency. In this regard, it proposes that all dwellings will be designed so that maximum water consumption is 105 litres per person per day. This is consistent with London Plan Policy 5.15 and draft New London Plan Policy SI5 Water Infrastructure (excluding an allowance of 5 litres or less per head per day for external water consumption). This should be secured by way of condition.

## **Overheating**

- 6.10.9 The London Plan, both in its current form and draft seeks to ensure to minimise impacts on the urban heat island through design, layout, orientation, materials and incorporation of green infrastructure. Major developments through their energy strategy should demonstrate how the development will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy set out under policy 5.9 and draft policy S1 4.
- 6.10.10 A separate overheating study was undertaken to assess and minimise overheating. Within this, a TM59 assessment undertaken using the IES Virtual Environment software, which is a CIBSE AM11 compliant thermal modelling software. The DSY1, DSY2 and DSY3, London Heathrow, high emission, 50% percentile weather files were used to assess current overheating potential. The results show that all but one of the assessed units within the development pass the overheating assessment for the current DSY1 scenario, which is the weather file recommended to be used in TM59. The development also had high pass rates when assessed using DSY2. However, in more extreme heat, such as DSY3 scenarios, the building struggles to meet the requirements of Criteria 2. Although DSY2 and DSY3 scenarios are rare weather events, guidance has been provided within the report to prevent overheating. A condition to ensure this is followed should these be deemed necessary is therefore recommended.

## **Wind Microclimate**

- 6.10.11 In view of the taller buildings proposed on this site, a Wind Microclimate assessment has been undertaken. To predict the local wind environment associated with the completed development, and the resulting pedestrian comfort within and immediately surrounding the site, wind tunnel testing of the proposed development has been undertaken. This is the best method of quantifying and classifying in accordance with the widely accepted Lawson Comfort Criteria. A 1:300 scale model of the existing site and the surrounding area within a 360m radius of the entire site was constructed. a scale model of the building comprising the proposed development has also been constructed.
- 6.10.12 A Wind Microclimate study has been submitted alongside this application by Urban Microclimate. The report states that the site is partially sheltered from approaching winds by the surrounding buildings. The proposed development is of modest height, with the massing gradually increasing from southwest to northeast,

encouraging prevailing south-westerly winds to pass up and over the development. The report states that the potential for any downdraughts and subsequent channelling of pedestrian level winds, for prevailing south-westerly wind, is therefore limited. The report concludes that the proposed development is not expected to have any significant impact on conditions within the surrounding area, which are expected to generally remain suitable for existing activities, including recreational activities in surrounding private gardens.

*Potential Cumulative effects of proposed development and Grange Farm Estate*

- 6.10.13 The Urban Microclimate study suggests that the Grange Farm redevelopment would result in the proposed development being more sheltered from north-easterly winds although this is not expected to materially affect the suitability of conditions within the site as discussed above. On this basis, potential adverse cumulative effects are expected to be limited to channelling of westerly winds between the western blocks and into the combined phase of the linear garden, between the developments. However, the associated soft landscaping in this area is expected to largely mitigate this potential effect, such that conditions are expected to be suitable for recreational activities including at least short periods of standing or sitting, such as for picnics, may benefit from localised shelter from hedging or tall shrub planting (where not already proposed) to create more amenable conditions during summer. However, similar conditions would also be expected in the absence of the proposed development (due to the increased exposure to prevailing south-westerly winds). On this basis, it is not considered that the potential cumulative effects would be significant.
- 6.10.14 In conclusion, with the implementation of the landscaping and mitigation measures set out in the landscaping strategy, there would be no significant effects from the proposed development either on its own or cumulatively. On this basis, the proposal is acceptable with regard to the relevant policies set out under paragraph 6.12.1 of this appraisal.

**Urban Greening**

- 6.10.15 Policy 5.10 of the London Plan sets out that development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include tree planting, green roofs and walls, and soft landscaping. A target of 0.4 for residential development should be achieved in line with policy G5 of the draft London Plan.
- 6.10.16 The applicant has calculated the Urban Greening Factor (UGF) of the proposed development as 0.4, which meets the target set by Policy G5 of The Publication London Plan (2020). The Mayor's (GLA) Stage 1 response required the applicant to clarify and submit detailed drawings showing the location and design of the green roofs. The updated design and access statement show the location of the green roofs proposed on all the blocks, tree planting, permeable paving, sealed surfaces, rain gardens and other sustainable drainage elements to name a few. Compared against the existing situation which has a UGF of 0.14 means that substantial improvements are made to the urban greening across the site is



considered to weigh in favour of the proposed development. As such, Officers consider the proposals to be acceptable in this regard.

## **6.11 Land Contamination and Remediation**

6.11.1 The relevant policies are:

- National Planning Policy Framework (2019)
- London Plan: 5.21
- Harrow Core Strategy: CS1
- Harrow Development Management Local Policies: DM15

6.11.2 A Geo-Environmental & Geotechnical Assessment (Ground Investigation) Report was produced by Jomas Engineering Environmental has been submitted with the application. A desk-based study was undertaken, and it was identified that due to the limitations with desk-based appraisals, further investigations are carried out. In relation to foundations the report suggests that all foundations should be deepened beneath deposits and founded within underlying strata. In terms of the traditional shallow foundations, the report recommends that formations are inspected by a geotechnical engineer prior to the pouring of concrete to confirm the bearing capacity. It is also concluded that the use of piling foundation solution will require the emplacement of an engineered granular piling mat to support the piling of and prevent overturning and designed in accordance with BRE 470. Recommendations in relation to the ground floor slabs, concrete in the ground, groundwater control and excavations have been provided.

6.11.3 The Council's Environmental Health Officer has not reviewed the report however as per the suggestions within the report it is recommended further site investigations, a written method statement providing details of the remediation scheme and a watching brief strategy during groundworks for unexpected contamination are provided and which can be secured by condition. Subject to this and a condition requiring the recommendations outlined in the desk-based report are carried out, the proposal would be acceptable in this regard.

## **6.12 Air Quality**

6.12.1 The relevant policies are:

- National Planning Policy Framework (2019)
- London Plan: 7.14
- Harrow Development Management Local Policies: DM1
- Draft London Plan: SI 1

6.12.2 The applicant has submitted an Air Quality Assessment (AQA) prepared by Ardent which assess the impact of the development during construction phase and completion stage on air quality on the surrounding area and within the development itself and future residents of the site.

6.12.3 Harrow is within an 'Air Quality Management Area (AQMA) due to the exceedance of the annual and hourly mean Nitrogen Dioxide and the 24 hours mean small airborne particles.

- 6.12.4 In terms of potential effects during construction, the main emissions are likely to be dust and particulate matters (PM<sub>10</sub>) generated during earth movement or from construction materials. However, with appropriate mitigation by way of appropriate duct suppression methods, the impact would have a neutral impact on the surrounding areas. The AQA states that the impact of construction traffic would be below the relevant criteria and will not be significant. Furthermore, in terms of future residents, the report concludes that air quality would be good and would not require mitigation.
- 6.12.5 The desktop assessment identifies that any additional traffic movements are likely to be the most significant local source of pollutants from the proposed development and its surroundings. The effects of this was modelled as part of the AQA and the conclusions drawn from this assessment conclude that the mean Nitrogen Dioxide emission and Particulate Matter (PM<sub>10</sub>), concentrations at surrounding existing receptors from the effects of increased traffic and traffic flows associated with the proposed development is predicted to be above the benchmark requirements of the Sustainable Design and Construction SPG (Greater London Authority, 2014) and therefore the development cannot be considered to be air quality neutral in terms of transport. An assessment of operational road traffic impacts has been provided within the AQA and the report concludes that the development is not considered to be air quality neutral in terms of transport emissions, despite resulting in a significant net reduction in transport emissions and therefore additional mitigation or damage cost is considered necessary.
- 6.12.6 The GLA have commented within their Stage 1 response that the proposed development is not air quality neutral and would exceed the transport emissions benchmark (TEB), and therefore does not comply with London Plan Policy 7.14 (part B(c)) and the Mayor's The Publication London Plan Policy SI 1 (part B) 2a). The GLA have therefore requested that the applicant provide a scheme of mitigation, appropriate in scale, to address the exceedance of the TEB, or address the exceedance of the TEB in scheme design (i.e. reduce vehicle trips associated with the development) by way of condition. Compliance with the Non-Road Mobile Machinery (NRMM) Low Emission Zone for London during the construction phase would also be secured within the Construction Environmental Management Plan, to ensure compliance with Policy 7.14 (part Bb) and The Publication London Plan policy SI 1 (part D). Measures to control emissions during construction and demolition would also be secured and implemented during the construction phase, as per paragraph 6.2 of the air quality assessment, to ensure compliance with Policy 7.14 (part Bb) and The Publication London Plan Policy SI 1 (part D).
- 6.12.7 Whilst the Council's Environmental Health Team has not commented in respect of this matter, it is considered that the mitigations suggested in the AQA in respect of the construction phase would be adequately captured with the Construction Logistics condition. Subject to the imposition of the recommended condition, the proposed development would give rise to no conflict with the above stated policies.
- 6.12.8 Overall it is considered that the proposed development will not generate any likely significant effects, either during the construction or operational phases with the implementation of the mitigation measures identified above. As such, there are no

air quality constraints arising from the proposed development and there would be no conflict with the policies listed under paragraph 6.14.1 of this appraisal.

## **6.13 Aviation**

6.13.1 The relevant policies are:

- National Planning Policy Framework (2019)
- London Plan: 6.6
- Harrow Development Management Local Policies: DM1
- Draft London Plan: T8

6.13.2 An Aviation Risk Assessment was prepared by PagerPower. The position and mass of the proposed development have been informed by advice and recommendations provided. The site is located 4.25km to the north of Safeguarding Area for RAF Northolt and occupies aerodrome height, technical and birdstrike statutory safeguarding zones.

6.13.3 The Ministry of Defence (MOD) was consulted on the proposed development. The MOD completed their own Obstacle Limited Surfaces (OLS) assessments at the early development stages of the application, alongside the applicants both of which informed the current layout and building altitudes. It was concluded that the all assessed building would not infringe the RAF Northolt OLS. The MOD provided comments based on the most up to date iterations of the development and state that in respect of the aerodrome height and technical safeguarding zones no concerns are raised. Furthermore, Within the birdstrike safeguarding zone, the principal concern of the MOD is with the creation of new habitats which may attract and support populations of large and, or, flocking birds hazardous to air traffic. The flat roofs with photovoltaic arrays within this proposal have the potential to attract and support breeding gulls and feral pigeons. To prevent gulls and feral pigeons from successfully breeding on the roof, full access to the roofs should be included in the design and a Bird Hazard Management Plan (BHMP) is required. The BHMP should include provision to prevent successful breeding by large gulls and feral pigeons on the roof spaces. This requirement should be applied as a condition of any planning permission granted.

6.13.4 The MOD concluded that provided the maximum build height does not exceed 82.725m AODL and a condition is applied to any consent granted for the submission of a BHMP and a Construction Management Strategy then the MOD does not object to this proposal. Furthermore, the consultant report confirms that the development would lie beneath the Obstacle Limitation Surfaces for RAF Northolt and would therefore not impinge upon: (1) Take-off and Climb Surface (TOCS); (2) Approach path (APPS); and Conical Surface. Subject to the aforementioned conditions, it is considered that the proposal would accord with the policies above.

## **6.14 Secure by Design**

6.14.1 The Metropolitan Police Secure by Design Officer was consulted during the application and raised concerns with the stepped connections between the site and Grange Farm Development as well as some detailed aspects of the

development 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 there would be appropriate external lighting and CCTV as added security measures which can be conditioned. Other detailed aspects, including the choice of doorways and boundary treatments will be conditioned and a pre-occupation condition is also attached to ensure the proposal achieved Secure by Design Accreditation.

## **6.15 Statement of Community Engagement**

- 6.15.1 The NPPF, Localism Act and the Council's Statement of Community Involvement encourage developers, in the case of major applications such as this, to undertake public consultation exercise prior to submission of a formal application.
- 6.15.2 Prior to the submission of this application, the applicant held a one day consultation event on 27<sup>th</sup> February 2020. The applicant had sent out leaflets (1,767 households) of invitation to local residents that residing close to the site. Invitation letters were also sent to local stakeholders, ward councillors, Harrow Hill Trust, Harrow Hill Planning Committee, Harrow Federation of tenants and residents association. The exhibition was held at the Royal British Legion, 76 Northolt Road and 79 residents attended. The proposals were also presented at the Council's Major Development Panel in February 2020. The applicant has submitted a comprehensive Statement of Community Involvement which sets out the outcome and feedback from these public events.
- 6.15.3 The Council also sent out letters of consultation to local residents in the surrounding area inviting them to make representations on the proposed development.
- 6.15.4 The applicant has sought to encourage public consultation in respect the proposal in line with the guidance set out in the NPPF and the Localism Act.

## **6.16 S.106 Obligations and Infrastructure**

- 6.16.1 The heads of terms of the section 106 agreement have been set out above. These are considered necessary to make the application acceptable, in accordance with policies 3.11, 3.13, 5.2, 6.3, 7.4, 7.5 and 7.6 of The London Plan (2016), Core Strategy (2012) policy CS1 and policies DM1, DM2 DM42, DM43 and DM50 of the Harrow Development Management Polices Local Plan and the Supplementary Planning Document: Planning Obligations (2013).

## **7.0 CONCLUSION 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 redevelopment of the site would enhance the urban environment in terms of material presence, attractive streetscape, and good routes, access and makes a positive contribution to the local area, in terms of quality and character and delivering new public spaces to support the wider masterplan and community. The massing and scale proposed would appropriately relate to the wider masterplan site and would permit full optimisation of this previously developed land to bring forward much needed housing which would positively add to the Council's housing delivery targets. The proposal would secure the provision of affordable housing at a level that meets the minimum affordable housing target set out in the development plan.
- 7.3 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 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 191 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.
- 7.4 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 the site to include the erection of three buildings ranging between 4-6 storeys and up to 191 residential units, associated landscaping; Access; Parking; Refuse stores and cycle parking; associated work:

Plan Numbers:

NRP-HBA-SW-ZZ-DR-A-08-0500 Rev 1, NRP-HBA-SW-ZZ-DR-A-08-0600 Rev 1, NRP-HBA-SW-ZZ-DR-A-08-0700 Rev 1, NRP-HBA-P01-XX-DR-A-20-0201 Rev P2, NRP-HBA-P01-XX-DR-A-20-0202 Rev P2, NRP-HBA-P01-XX-DR-A-20-400 Rev P2, NRP-HBA-P01-XX-DR-A-20-0401 Rev P2, NRP-HBA-P01-05-DR-A-20-0110 Rev P2, NRP-HBA-P01-01-DR-A-20-1202 Rev P2, NRP-HBA-P01-04-DR-A-20-0108 Rev P2, NRP-HBA-P01-00-DR-A-20-0100 Rev P2, NRP-HBA-P01-06-DR-A-20-0112 Rev P2, NRP-HBA-P01-02-DR-A-20-0104 Rev P2, NRP-HBA-P01-05-DR-A-20-0111 Rev P2, NRP-HBA-P01-03-DR-A-20-0106 Rev P2, NRP-HBA-P01-1-DR-A-20-02103 Rev P2, NRP-HBA-P01-04-DR-A-20-0109 Rev P2, NRP-HBA-P01-00-DR-A-20-0101 Rev P2, NRP-HBA-P01-06-DR-A-20-0113 Rev P2, NRP-HBA-P01-02-DR-A-20-0105 Rev P2, NRP-HBA-P01-03-DR-A-20-0107 Rev P2, NRP-HBA-P02-XX-DR-A-20-0203 Rev P2, NRP-HBA-P02-05-DR-A-20-0119 Rev P2, NRP-HBA-P02-01-DR-A-20-0115 Rev P2, NRP-HBA-P02-04-DR-A-20-0118 Rev P2, NRP-HBA-P02-00-DR-A-20-0114 Rev P2, NRP-HBA-P02-06-DR-A-20-0120 Rev P2, NRP-HBA-P02-02-DR-A-20-0116 Rev P2, NRP-HBA-P02-03-DR-A-20-0117 Rev P2, NRP-HBA-P02-XX-DR-A-20-0402 Rev P2, NRP-HBA-P03-XX-DR-A-20-0205 Rev P2, NRP-HBA-P03-XX-DR-A-20-0204 Rev P2, NRP-HBA-P03-05-DR-A-20-0126 Rev P2, NRP-HBA-P03-XX-DR-A-20-0122 Rev P2, NRP-HBA-P03-04-DR-A-20-0125 Rev P2, NRP-HBA-P03-00-DR-A-20-0121 Rev P2, NRP-HBA-P03-06-DR-A-20-0127 Rev P2, NRP-HBA-P03-02-DR-A-20-0123 Rev P2, NRP-HBA-P03-03-DR-A-20-0124 Rev P2, NRP-HBA-P03-XX-DR-A-20-0403 Rev P2, NRP-HBA-SW-XX-DR-A-20-0020 Rev P2, NRP-HBA-SW-05-DR-A-20-0015 Rev P2, NRP-HBA-SW-01-DR-A-20-0011 Rev P3, NRP-HBA-SW-04-DR-A-20-0014 Rev P3, NRP-HBA-SW-00-DR-A-20-0010 Rev P4, NRP-HBA-SW-06-DR-A-20-0016 Rev P3, NRP-HBA-SW-02-DR-A-20-0012 Rev P3, NRP-HBA-SW-03-DR-A-20-0013 Rev P3, NRP-HBA-SW-ZZ-DR-A-20-0030 Rev P2, NRP-HBA-SW-ZZ-DR-A-20-0031 Rev P2, NRP-HBA-SW-XX-DR-A-08-0000 Rev P2, NRP-HBA-SW-00-DR-A-20-0018 Rev P2, NRP-HBA-P03-SW-DR-SK-0008

Supporting Documents:

Planning Statement (Prepared by DP9, June 2020), Aborigicultural Impact Assessment (Prepared by PJC Consultancy, 9<sup>th</sup> June 2020), Air Quality Assessment (Prepared by Ardent Consulting Engineers, ref: 193000-09, dated June 2020), Design and Access Statement (Prepared by Hawkins Brown, dated 15 June 2020), Archaeological Desk-based assessment (Prepared by RPS, dated June 2020), Delivery and Servicing Management Plan (Prepared by Ardent Consulting Engineers, ref: 193000-07, dated June 2020), Daylight and Sunlight Report (Prepared by Point, dated June 2020), Covering Letter (Prepared by Point, dated 12 June 2020), Preliminary Ecological Appraisal (Prepared by The Ecology Partnership), Flood Risk Assessment and Drainage Strategy (Ref: 193000-05, dated June 2020), Framework Travel Plan (Prepared by Ardent Consulting Engineers, dated June 2020), Geo-Environmental & Geotechnical Assessment (Ground) Investigation) Report (Prepared by JOMAS Engineering Environmental), Healthy Streets Transport Assessment (Prepared by Ardent Consulting Engineers, Dated June 2020), Noise Assessment (Prepared by Ardent Consulting Engineers, dated June 2020), Statement of Community Involvement (SCI) (Prepared by Your Shout, dated May 2020), Utilities and Services Statement (Prepared by Ardent Consulting Engineers, dated June 2020), Viability Study (Prepared by Turner Morum LLP, dated June 2020), Aviation Risk Assessment (Prepared by Pagerpower, dated 17 June 2020), Car Park Management Plan (Prepared by Ardent Consulting Engineers, dated June 2020), Circular Economy Statement (Prepared by JAW, dated 12 June 2020), Life Cycle Carbon Assessment (Prepared by JAW, dated 15 June 2020), Outline Construction Logistics Plan (Prepared by Ardent, dated June 2020), Overheating Assessment (Prepared by JAW, dated 15 June 2020), Design and Access (5.0 Landscape Design only), Affordable Housing Document (Prepared by Hawkins Brown, dated 16 November 2020), Technical Report (Prepared by Ardent Consulting Engineers (dated 17 November 2020), Energy Strategy (Prepared by JAW, dated 6 October 2020), Fire Engineering Concept Fire Strategy Report (Prepared by Clarke Banks, dated 3.6.2020), Covering Letter prepared by DP9 (dated 16 November 2020), Wind Microclimate Study (Prepared by Urban Microclimate, dated July 2020), Heat Network Connection Initial Report (Prepared by TPS, dated October 2020), Area Schedule (dated November 2020), Urban Greening Factor – Summary (Prepared by Hawkins Brown, dated 21/12/2020), Email dated 22 May 2020 re. Energy Centre.

3. Construction Logistics Plan

No development shall take place, including demolition, until a construction logistics plan has first been submitted to the Local Planning Authority in writing to be agreed. 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; and

- f) a scheme for recycling/disposing of waste resulting from demolition and construction works.
  - g) measures for the control and reduction of dust
  - 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. Phasing Strategy

Notwithstanding the approved plans, the development hereby approved shall not commence until a Phasing Strategy has been first submitted to, and approved in writing by the local planning authority, setting out how each plot and the buildings within those plots including affordable housing units which will be secured within the first phase of the proposed development, along with associated streets and landscape works would be delivered. The details shall include appropriate safeguards, if necessary, to be provided for buildings that are ready for occupation whilst construction works continue on other phases of the site and any temporary works that may be required to facilitate access to any buildings/part of the site. The Phasing Strategy shall, unless otherwise agreed in writing, be implemented as approved.

REASON: Due to the quantum of development and the number of plots associated with this development, a Phasing Strategy is required to ensure the development is delivered on an appropriate phased basis and appropriate safeguards are in place during these phased work to protect the amenities of future residents of this site. Details are required PRIOR TO COMMENCEMENT OF DEVELOPMENT to ensure a satisfactory method of construction is agreed prior to any works on site commencing.

#### 5. Construction Environmental Management Plan

No site works or development shall take place until a Construction Environmental Management Plan (CEMP) is submitted to and approved in writing by the local planning authority. This should include:

- 1a) how potential impacts on biodiversity, including protected and priority species will be avoided or, where this is not entirely possible, minimized
- b) the steps to be taken to ensure such measures will be fully implemented.
- 2) A Mitigation and Enhancement Management Plan detailing the measures to be undertaken to provide appropriate mitigation and gain for biodiversity, in respect of the impacts of the scheme's construction and operation, within and around the site, to include the provision of:
  - a) Trees, shrubs and other vegetation, including green walls, and any necessary protection for retained trees;
  - b) Full specification of a mix of blue-green and brown roof provision, including blue-green bio-solar areas, with full details of build-up, substrate, water retention, plant species mixes, watering, roof-top invertebrate shelters



and target condition across each roof area. These measures would need also to take account of RAF Northolt views.

- c) Full details of the type, numbers and locations for bat, bird and other wildlife shelters, with a requirement to include provision for swift, house sparrow and a selection of other birds and a mix of bat species including breeding shelters. All bat and bird boxes should be incorporated within the fabric of the new buildings and be of 'woodcrete' or similarly durable material. Overall provision should be one wildlife shelter per every three dwellings with an approximate 45:40:15 mix for birds: bats and invertebrates.
- 3) A detailed lighting strategy that will minimize potential disturbance to the behaviour of nocturnal species including bats and permanently prevent direct illumination of the provided bat shelters.
- 4) A detailed plan for:
- a) the timing of the above works in relation to the construction schedules and the establishment phase for the soft landscaping;
  - b) the maintenance and management of the provided wildlife features for a period of at least 5 years following on from the establishment of the soft landscaping.

The works shall be completed in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.

REASON: For the purposes of proper planning and in support of local, regional and national policy requirements for the enhancement of biodiversity and access to nature.

## 6. Construction Management Strategy – Air Traffic

Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority covering the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the details of cranes and other tall construction equipment (including the details of obstacle lighting).

The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

Reason: To ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems.

REASON: To ensure the safe operation of air traffic.

## 7. 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

8. 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

9. 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

REASON: To prevent the increased risk of flooding, reduce and mitigate the effects of flood risk following guidance in the National Planning Policy Framework.

10. Permeable Paving and Drainage Strategy

Notwithstanding the approved details and prior to the commencement of development, full details of the permeable paving and 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. Details thereby approved shall be retained thereafter.

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

11. Emergency Planning

The development of any building hereby permitted shall not be commenced above damp-proof course level until Emergency Planning Information (reference should be made to EA flood warning procedures for occupants and users. Details

of safe access/egress arrangements and a plan indicating a safe route for the occupants and users away from the source of flooding should be submitted).

has been submitted to and approved in writing by the Local Planning Authority.

Reason: To build in resistance and resilience in managing, reducing and mitigating the effects of flood risk and to ensure evacuation arrangements are adequate and safe access/egress from the site during a flood event is provided.

## 12. Pipe Protection

The development hereby permitted shall not commence until a scheme for the protection of the piped watercourse has been submitted to, and approved in writing by, the Local Planning Authority. The scheme shall include a structural survey by CCTV and trial holes to assess the construction, position, condition and expected life of the culvert; proposal of an agreed method of repair or replacement if required; full details demonstrating that the new structure does not impart any load on the culvert or destabilise it in any way; details of any necessary build over or adjacent to the culvert; details of access for future repairs, blockage clearance, maintenance and future condition surveys, connection point and discharge level.

The applicant can contact the Harrow Infrastructure Team for further information regarding this matter.

Reason: To protect the integrity of the piped watercourse structure, reduce and mitigate the effects of flood risk.

## 13. Materials

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

- a) facing materials for the building, including brickwork bond details;
- b) windows/ doors, including those to all servicing areas;
- c) balcony screens including balustrade detail, privacy screens and soffits;
- d) boundary treatment including all vehicle and pedestrian/ access gates;
- e) ground surfacing; and
- f) raised planters.

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.

14. Noise and Ventilation

The development hereby approved in relation to criterion a) and b) below concerning each building, plot or phase (whichever is relevant) shall not progress beyond damp proof course level until details noted below have been submitted to and approved in writing by the local planning authority:

a) full details (including specification) of any extraction flues, plant/ ventilation systems, rainwater disposal systems (including downpipes) and any rollershutters, gates and other means of controlling access to the car park or areas within the site including, but not limited to the Mews Street adjacent to Plot 03;

b) details to demonstrate that all plant/ ventilation systems would meet the plant noise criteria set out in the submitted Environment Statements; and

c) a follow up acoustic survey to demonstrate installed plant compliance shall be submitted within six months of the first occupation of the development.

The application shall be implemented in full accordance with such details and be maintained thereafter.

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

15. 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. This should also include details of the following:

1. Decarbonisation strategy for the DH network connection;
2. GLA's Carbon Emission Reporting Spreadsheet for use updated SAP10 emission factors alongside the SAP 2012 emission factors;
3. Confirmation of estimated energy costs.

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.

REASON: To ensure the delivery of a sustainable development

16. Contamination

The development hereby approved in relation to each plot or phase (whichever is relevant) shall not be first occupied until a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to

demonstrate that the site remediation criteria have been met. It shall also include any plan (a 'long-term monitoring and maintenance plan') for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the local planning authority. The long-term monitoring and maintenance plan shall be implemented as approved.

A verification report is only required to be submitted and approved once per phase.

REASON: To protect groundwater and future end users of the site

17. Landscaping

Notwithstanding the details that have been submitted, the development hereby approved shall not commence 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) A scheme for detailed hard and soft landscaping of the development, to include details of the planting, hard surfacing materials, raised planters and external seating and so on. 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 garden/open space areas and the adjacent co-living units.
- b) Green roofs, hard and soft landscape details and planting plans, the roofs at first, third and fourth floor and the roof area with PV panels to be incorporated into the green roof areas where feasible, including written specification of the planting and the biodiverse roof details, planting plans, and associated features (e.g. invertebrate shelters), details of the proposed irrigation or any watering system to be installed for regular watering in dry / drought conditions for the landscaped areas maintenance and proposed ongoing plant replacement, for any plant failures, during the lifetime of the built development;
- 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 all furniture, boundary treatment, specification for the proposed supports and fixings for plants, landscape structures and any pergolas and climbing plant frames, including proposed material and source / manufacturer,

irrigation for planting and detailed drawings of such; for all communal areas, raised beds and bespoke furniture;

- e) Details of the two access points on the eastern boundary of the site including step depths, access ramps and / or any relevant details associated with the safe access to and from the Grange Farm Development; and
- f) Suitable wayfinding signage and mitigation should be secured to ensure the safe function of pedestrian, play and servicing road through the middle of the site and to avoid conflicts between the different user groups.

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

#### 18. Refuse Strategy

Unless otherwise agreed in writing by the Local Planning Authority, prior to commencement of development (excluding any demolition works) pursuant to this permission, details of:

- (a) the proposed number of refuse and recycling bins per unit.

The development shall be carried out in accordance with the approved details and the details outlined within the Delivery and Servicing Management Plan (Prepared by Ardent) dated June 2020 unless otherwise agreed in writing by the Local Planning Authority.

REASON: To ensure that adequate refuse storage and disposal facilities are provided, in the interests of local character and amenity.

#### 19. Water Efficiency

The development hereby approved in relation to each building, plot or phase (whichever is relevant) shall not progress beyond damp proof course level until a strategy for the efficient use of mains water within the residential parts of the development, pursuant to a water consumption limit of 105 litres per person per day, has been submitted to, and agreed in writing by, the local planning authority. The development shall be carried out in accordance with the strategy so agreed and shall be retained as such thereafter.

REASON: To ensure that the development makes efficient use of mains water.

20. 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

21. Photovoltaic

The development hereby approved in relation to each building, plot or phase (whichever is relevant) shall not progress above damp proof course level until a detailed roof layout has been submitted to, and approved by the local planning authority indicating the proposed location of the photovoltaic panels (PV). This should include details of over shading impacts on roof plant uses and details ensuring these would not exceed RAF Northolt height restrictions.

REASON: To ensure the delivery of a sustainable development

22. 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

23. Communal Facilities

Prior to the first occupation of the development, details of a strategy for the provision of communal facilities for television reception (e.g. 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

24. Landscape Management and Maintenance

The development relating to the Detailed Application hereby approved shall not be first occupied until a scheme for the on-going management, management programme of works and maintenance of all the hard and soft landscaping within the development, to include a Landscape Management Plan, including long term design objectives, management responsibilities and set out, graphically and / or in writing, the overall functional and aesthetic objectives of the landscape scheme and the steps (e.g. legal arrangements including ownership and management responsibilities, planned maintenance tasks, any phased works, management programme of works, monitoring procedures etc.) that will be taken after implementation to ensure that the scheme becomes successfully established and reaches maturity.

The maintenance schedules should include details of the arrangement for the implementation for all landscape areas including communal residential areas green roof, blue infrastructure, other than small, privately owned, domestic gardens and who is responsible for the maintenance. The aforementioned details shall be submitted to, and approved in writing by, the local planning authority. Details shall also include schedule of landscape maintenance for year 1, years 2-5 and on-going maintenance from year 6 onwards.

The Landscape Management Plan 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

Notwithstanding the details hereby approved, 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. Car Park Design and 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);
- e) Identify number and location of disabled bay(s) for London Affordable Rent Housing.
- f) details of the siting, size and manoeuvrability of motorcycle spaces.

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

29. Aboricultural 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 Aboricultural Impact Assessment (Prepared by PJC, dated 9 June 2020) 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 aforementioned report and Tree Protection Plan. 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. Mailboxes

The mailboxes as shown on the approved plans shall be installed to ensure that they are secure and meet all safety standards and shall be made available prior to the first occupation of each relevant building and maintained thereafter.

REASON: To ensure that the development contributes to the achievement of a lifetime neighbourhood and a high standard of design and layout.

36. Piling

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

REASON: To protect groundwater and future end users of the site.

37. Storage

The residential units hereby approved shall each be provided with storage space in accordance with standard set out under Table 3.3 (Minimum Space Standards for new dwellings) appended to policy 3.5C of the London Plan (2016) unless otherwise agreed in writing by the local planning authority.

REASON: To ensure that the development achieves a high standard of residential quality for future occupiers of the development

38. Connection to District Heat Network (DHN)

Should a connection to the Grange Farm district heating networking not be achieved within 5 years of occupation of the development, the applicant must provide confirmation and evidence to the local planning authority that retrofitting of the temporary gas boiler energy centre hereby approved, with LZC heating technology that will meet the 35% on-site carbon reduction target of the development has been provided, unless otherwise agreed.

REASON: To ensure the delivery of a sustainable development

## **Informatives**

### **1. Planning Policie**

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

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, S11, S12, S13, S14, S15, S12, S13, 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)

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](mailto: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 £998,880 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 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

5. Harrow Community Infrastructure Levy (Provisional)

Harrow has a Community Infrastructure Levy which applies Borough wide for certain developments of over 100sqm gross internal floor space.

Harrow's Charges are:

Residential (Use Class C3) - £110 per sqm;

Hotels (Use Class C1), Residential Institutions except Hospitals, (Use Class C2), Student Accommodation, Hostels and HMOs (Sui generis) - £55 per sqm;

Retail (Use Class A1), Financial & Professional Services (Use Class A2), Restaurants and Cafes (Use Class A3) Drinking Establishments (Use Class A4) Hot Food Takeaways (Use Class A5) - £100 per sqm

All other uses - Nil.

The Provisional Harrow CIL liability for the application, based on the Harrow CIL levy rate for Harrow of £110/sqm is £2,730,604.94

This amount includes indexation which is 323/224. The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).

The CIL Liability is payable upon the commencement of development.

You are advised to visit the planningportal website where you can download the relevant CIL Forms.

Please complete and return the Assumption of Liability Form 1 and CIL Additional Information Form 0 .

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

#### 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. 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

8. 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.

9. 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.

10. 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)

**Checked**

<u>Interim Chief Planning Officer</u>	<u>Beverley Kuchar 07/01/2021</u>
<u>Corporate Director</u>	<u>Paul Walker 07/01/2021</u>



## **APPENDIX 2: SITE PHOTOS**

View from Northolt Road access into the Retail Park



Existing Access to Retail Park



View of existing retail units, car park and corner of Waitrose Store to left and Grange Farm Close to the right



View of site from car park of retail park



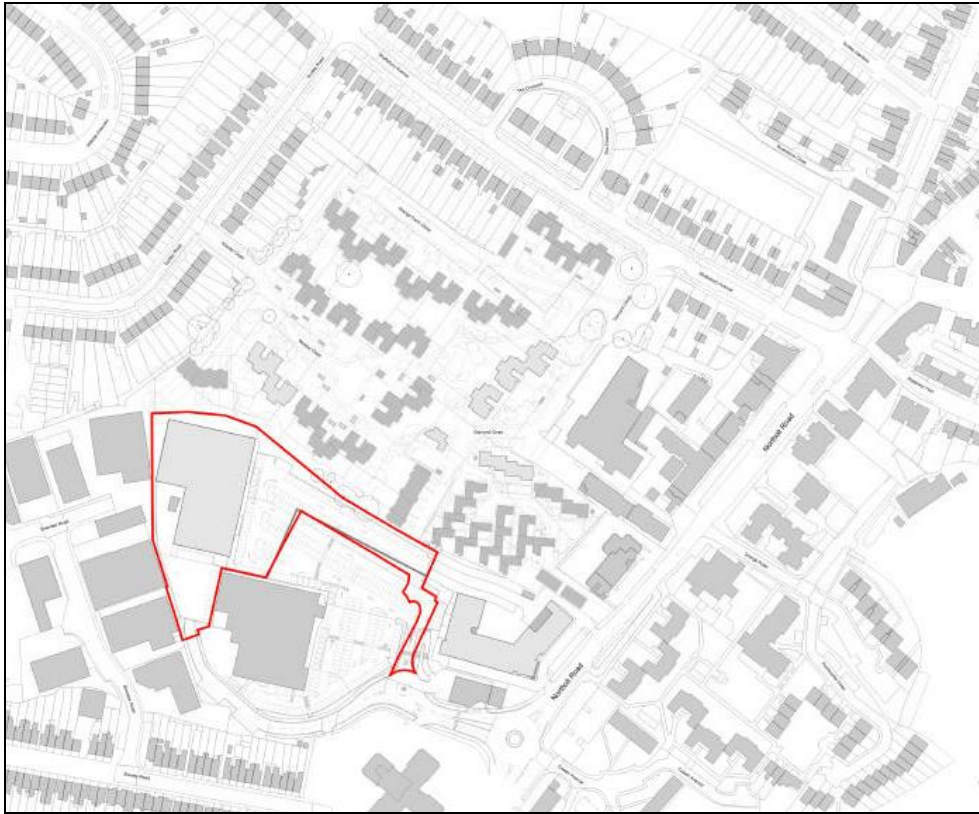
View of existing delivery and service road south-west of the site



View from Retail Park car park towards Northolt Road



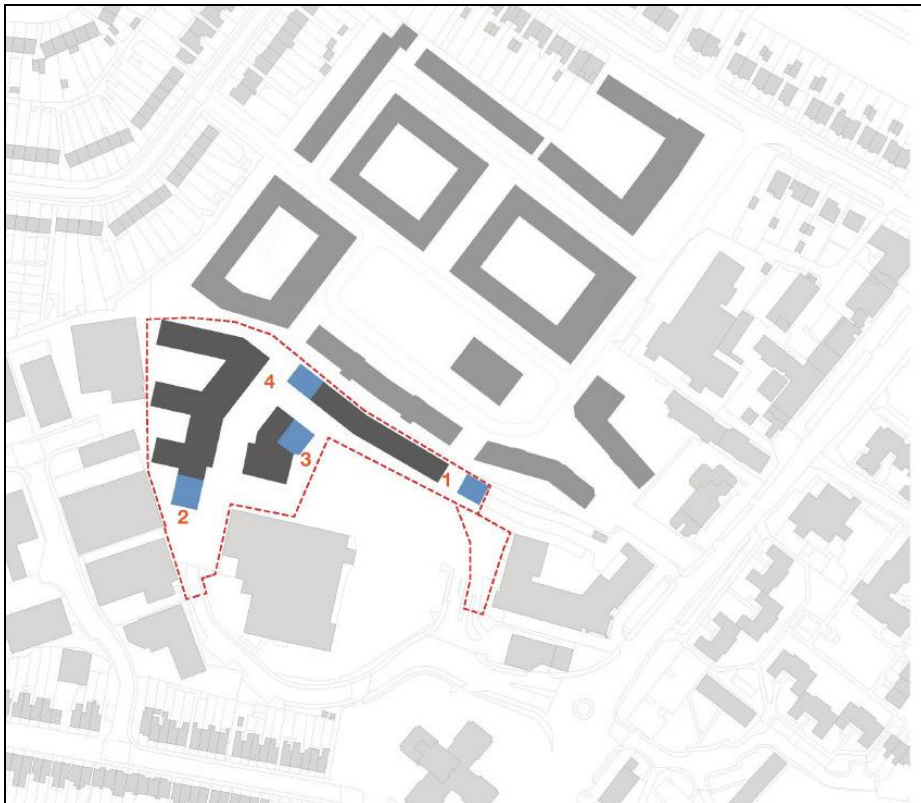
## APPENDIX 3: SITE PLAN



Proposed site plan

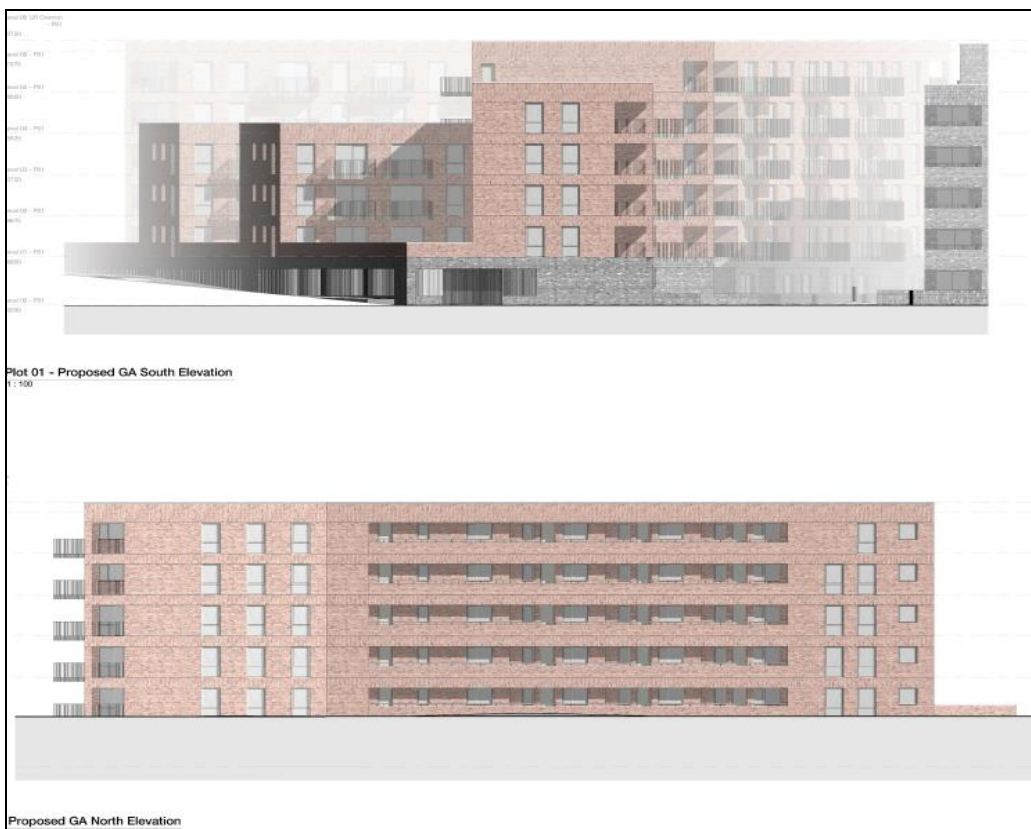


Proposed Site in context of emerging Grange Farm Development

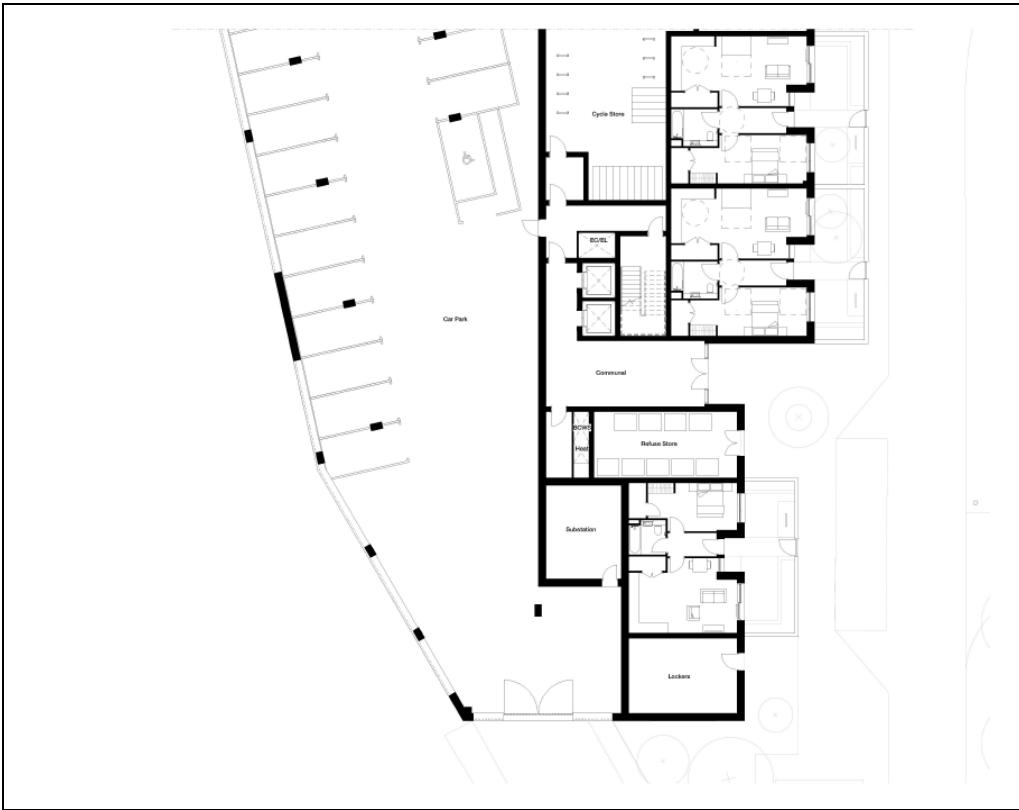


## **APPENDIX 4: PLANS AND ELEVATIONS**

Plot 01 (Linear block)



Plot 1A (Ground Floor)



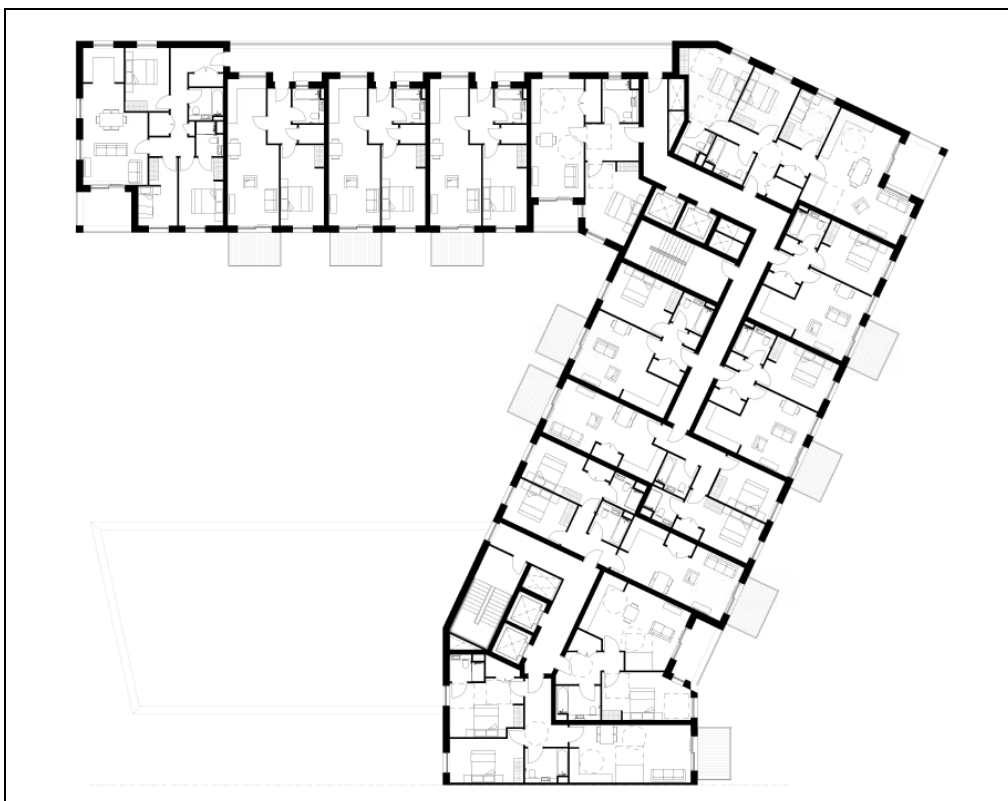
Plot 1A (Typical Upper Floor Layout)



Plot 1B (Ground Floor Layout)

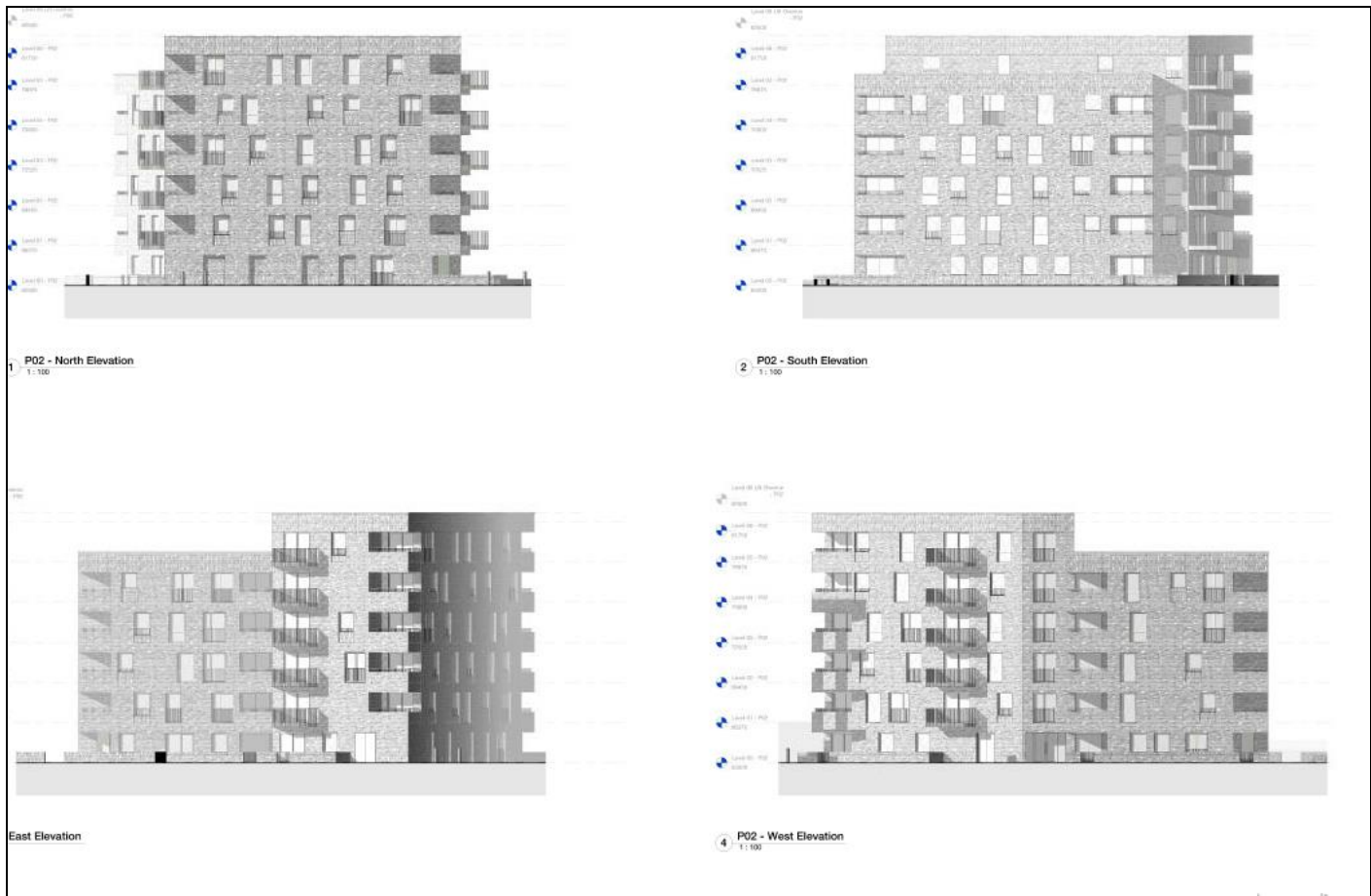


Plot 1B (Typical Upper Floor Layout)





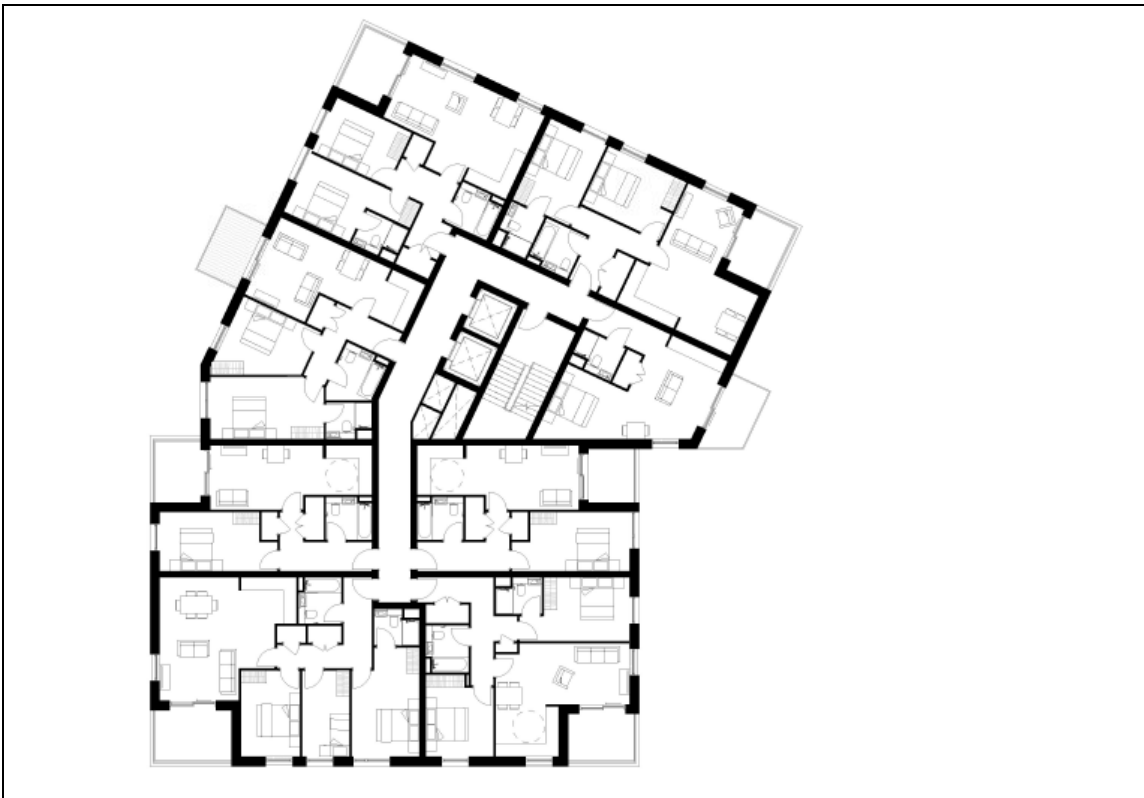
## Plot 02 (Pavilion Block)



## Plot 02 (Proposed Ground Floor)



Plot 02 (Typical Upper Floor Layout)



Plot 03 (Mews Block)





1 Plot 03 - Proposed GA East Elevation  
1 : 100



2 Plot 03 - Proposed GA West Elevation  
1 : 100

## Plot 03 (Ground Floor Plan)



## Plot 03 (Typical Upper Floor layout)



### 3D Views

#### Proposed Development in context of Grange Farm consented scheme



Sketch View from connection to Grange Farm towards Plots 01 and 02 (left) and View towards Plot 03 (right)



Sketch view along Mews Street (Plot 03) (Left) and Views towards Plots 01 and 02 with Grange Farm (right)



View of the steps leading to Grange Farm from a ground floor garden in Plot 01



## APPENDIX 5: STAGE 1 GLA RESPONSE

### GREATER LONDON AUTHORITY

#### Good Growth

Selina Hotwani  
West Area Team  
Regeneration, Enterprise and Planning  
London Borough of Harrow

Our ref: GLA/2020/6010/S1/01  
Your ref: P/2052/20  
Date: 24 August 2020

By Email

Dear Selina

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

**Northolt Road Retail Park, South Harrow**

**Local Planning Authority reference: P/2052/20**

I refer to the copy of the above planning application, which was received from you on 09 July 2020. On 24 August 2020, Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and Skills, acting under delegated authority, considered a report on this proposal, reference GLA/2020/6010/S1/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not yet comply with the London Plan and the Mayor's Intend to Publish London Plan for the reasons set out in paragraph 75 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the

Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Melvyn Dresner, e-mail [Melvyn.Dresner@tfl.gov.uk](mailto:Melvyn.Dresner@tfl.gov.uk), telephone 07590600428.

Yours sincerely



**John Finlayson**  
Head of Development Management

cc Navin Shah, London Assembly Constituency Member  
Andrew Boff, Chair of London Assembly Planning Committee  
National Planning Casework Unit, MHCLG  
Danny Calver, TfL  
Sunny Desai, DP9 Ltd.



**Northolt Road Retail Park, South Harrow**

in the London Borough of Harrow

planning application ref: P/2052/20

<b>Strategic planning application stage 1 referral</b> Town and Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Mayor of London) Order 2008.
<b>The proposal</b> Redevelopment of the site to provide three buildings ranging from 4-6 storeys for the provision of 191 residential units, associated landscaping, access, car and cycle parking, refuse stores and associated works.
<b>The applicant</b> The applicant is <b>Northolt Retail Park LLP (Aitch Group)</b> . The architect is <b>Hawkins/Brown</b> .
<b>Strategic issues</b> <b>Principle of development:</b> The principle of the redevelopment of an edge-of-centre retail park to provide residential uses is supported as it optimises the land and contributes towards housing delivery, in accordance with the Mayor's Intend to Publish London Plan Policies SD6, SD7, SD8, E9 and H1. The loss of retail uses does not raise strategic concern (paragraphs 13-16). <b>Affordable housing:</b> The scheme proposes 10% affordable housing by habitable room, with a tenure split of 60% low-cost rent housing and 40% intermediate housing. The provision of 10% affordable housing falls significantly below the threshold level of affordable housing set out in the Mayor's Intend to Publish London Plan and, prior to the independent verification of the viability position, is wholly unacceptable. The applicant's viability assessment will be robustly scrutinised by GLA Officers to ensure the scheme provides the maximum reasonable amount of affordable housing. Early and late stage viability review mechanisms, and affordability levels should be secured (paragraphs 17-26). <b>Design:</b> The proposal seeks to optimise the site and the proposed building heights are sympathetic to the surrounding context. The massing of the proposed buildings could be acceptable subject to further consideration of the architectural detailing. Further consideration should be given to elements of residential quality, and further information is required in relation to the proposed play strategy. A revised fire statement must also be provided, evidencing compliance with the Mayor's Intend to Publish London Plan Policy D12 (paragraphs 30-48). <b>Transport:</b> Options for improved pedestrian access to the site, as well as links from the proposed on-site cycle route into wider cycle routes, should be reviewed and improved. An assessment of collision analysis should be undertaken. A delivery and servicing plan, and construction logistics plan should be secured by condition. (paragraphs 64-70). Issues relating to <b>energy, air quality and urban greening</b> need to be addressed.
<b>Recommendation</b> That Harrow Council be advised that the application does not yet fully comply with the London Plan and the Mayor's Intend to Publish London Plan, for the reasons set out in paragraph 75 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

## Page 2:

### Context

1 On 9 July 2020, the Mayor of London received documents from Harrow Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town and Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan and the Intend to Publish London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1A of the Schedule to the Order 2008:

- Category 1A(1)- "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats".

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

4 The Mayor of London's statement on this case will be made available on the GLA website: [www.london.gov.uk](http://www.london.gov.uk).

### Site description

5 The site is 0.93 hectares in size and comprises the north-west corner of the Northolt Road Retail Park in South Harrow. The site is bound by a site known as Grange Farm Estate to the north (which received permission for comprehensive redevelopment in 2019), by a Waitrose supermarket and associated car parking to the south and east, and by industrial/retail units to the west. The site is accessed via the Northolt Retail Park's access roundabout. The site retains a right of access over the retail park's unadopted access roads. The site currently comprises existing "big-box" retail units (occupied by Dunelm, Sports Direct and Homesense retailers) and associated surface car parking. There is an existing water culvert that runs through part of the site.

6 The site does not contain any designated heritage assets and is not located within a conservation area. The site is located approximately 350 metres from the Mount Park Estate Conservation Area, approximately 300 metres from the Roxeth Hill Conservation Area and approximately 360 metres from the Grade II listed 29-37 Horn Buckle Close. The site is located within RAF Northolt's conical protected surfaces.

7 The nearest part of the Strategic Road Network is Northolt Road which is adjacent to the site. Northolt Road is served by five regular bus routes (395, 140, 116, H9 and H10), school buses and night services (N140). The nearest station is South Harrow, which is on the Piccadilly Line, approximately 400 metres from site. The highest Public Transport Accessibility Level on site is 4, on a scale of 1 to 6b, where 1 is the least accessible location and 6b the most.

## Page 3

### Details of the proposal

8 The proposal comprises the demolition of the existing buildings and the redevelopment of the site to provide three buildings ranging from 4-6 storeys for the provision of 191 residential unit, associated landscaping, access, parking, refuse and cycle parking, and associated works.

### Case history

9 GLA officers held a pre-application meeting on this scheme on 29 January 2020. The pre-application report (reference number GLA/5400) concluded that while the proposed residential use is supported in principle, to ensure a high-quality environment for future residents, further consideration should be given to the layout of the proposed scheme, the quantum of development proposed within the site and the wider area's masterplanning. Furthermore, the pre-application concluded that the applicant should address comments made in respect of affordable housing, urban design, historic environment, inclusive access, energy, the circular economy, flood risk, sustainable drainage, water efficiency, urban greening and transport, to ensure accordance with the London Plan and the Mayor's Intend to Publish London Plan.

### Strategic planning issues and relevant policies and guidance

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

11 The following are relevant material considerations:

- The National Planning Policy Framework (February 2019) and National Planning Practice Guidance;
- The London Plan Intend to Publish Version (December 2019) which should be taken into account on the basis explained in the NPPF;
- On the 13 March 2020, the Secretary of State issued a set of Directions under Section 337 of the Greater London Authority Act 1999 (as amended) and, to the extent that they are relevant to this particular application, have been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation; and
- The Mayor's Affordable Housing and Viability SPG.

12 The relevant issues and corresponding policies are, as follows:

- Land use London Plan; Mayor's Intend to publish London Plan;
- Housing and affordable housing London Plan; Mayor's Intend to publish London Plan; Affordable Housing and Viability SPG; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;

## Page 4

- Urban design and heritage London Plan; Mayor's Intend to Publish London Plan; Shaping Neighbourhoods: Character and Context SPG;
- Inclusive design London Plan; Mayor's Intend to Publish London Plan; Accessible London: Achieving an Inclusive Environment SPG;
- Sustainable development London Plan; Mayor's Intend to Publish London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;
- Transport London Plan; the Mayor's Transport Strategy.

### Principle of development

13 Spatially, the site is not located within a town centre or an opportunity area. The site is approximately 350 metres from the South Harrow Town Centre, which is classified as a District Centre within the London Plan and the Mayor's Intend to Publish London Plan. The site is therefore an out-of-centre location.

14 The proposal comprises the demolition of all on-site buildings and the redevelopment of the site for residential land uses. As existing the site comprises 2,973 sq.m. of retail warehouse (A1 Use Class), currently occupied by "big box" retailers (Dunelm, Sports Direct and Home Sense).

15 Policies SD6, SD7, SD8 and E9 of the Mayor's Intend to Publish London Plan seek to realise the potential of edge of centre sites (including existing retail parks) through mixed-use or residential development that makes the best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. Further, Policy H1 of the Mayor's Intend to Publish London Plan sets out that the redevelopment of retail and leisure parks to deliver housing intensification is encouraged. Accordingly, the principle of the introduction of residential use on this out-of-centre site is supported. In accordance with Policy SD7 of the Mayor's Intend to Publish London Plan, this net loss of retail floorspace does not raise strategic concerns.

16 London Plan Policy 3.3 'Increasing housing supply', in seeking to increase the supply of housing in London, sets borough housing targets, and in Table 3.1 sets a minimum ten-year housing supply monitoring target for the London Borough of Harrow of 5,927 additional homes between 2015 and 2025. The Mayor's Intend to Publish London Plan sets a ten-year target of 8,020 for the period 2019/2020 to 2028/2029. The increase in the housing targets identified in the Mayor's Intend to Publish London Plan evidences the continued need for housing in Harrow. The scheme proposes to deliver 194 residential units, which would contribute towards Harrow's housing targets and is supported. Affordable housing is discussed in the subsequent section of this report.

### Affordable housing

17 London Plan Policy 3.12 requires boroughs to seek the maximum reasonable amount of affordable housing in all schemes. London Plan Policies 3.11 and 3.12, Policy H4 of the Mayor's Intend to Publish London Plan, as well as the Mayor's

## Page 5:

Affordable Housing and Viability SPG set a strategic target of 50% affordable housing in all new developments.

18 The Mayor's Affordable Housing and Viability SPG and Policy H5 of the Mayor's Intend to Publish London Plan set out the 'threshold approach' to planning applications whereby schemes that meet or exceed the relevant 35% or 50% threshold of affordable housing by habitable room without public subsidy, and meet the Mayor's preferred tenure mix, are eligible to follow the "Fast-Track Route". Generally, this means that schemes that provide 35% affordable housing by habitable room on site (or 50% for industrial and public land), without public subsidy, and meet the specified tenure mix, in accordance with Policy H5 of the Mayor's Intend to Publish London Plan, are not required to submit viability information nor be subject to a late stage review.

19 Policy H6 of the Mayor's Intend to Publish London Plan and the Mayor's Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the borough as low cost rented homes or intermediate based on identified need. There is a presumption that the 40 per cent to be decided by the borough will focus on low cost rent, however in some cases a more flexible tenure may be appropriate, for example due to viability constraints or to achieve mixed and inclusive communities. In this case, the Harrow Local Plan sets an affordable housing tenure balance of 60% social / affordable rent and 40% intermediate.

20 The scheme proposes 191 residential units of which 10% is proposed as affordable housing by habitable room (18 units). It is understood that the affordable housing proposals comprise a tenure split of 60% low-cost rented housing (London Affordable Rent) and 40% intermediate housing (shared ownership).

21 The provision of 10% affordable housing falls significantly below the 35% threshold level of affordable housing and, in the absence of a verified viability position, is unacceptable. While the proposal complies with the minimum tenure expectations set out in the Council's Local Plan and Policy H6 of the Mayor's Intend to Publish London Plan, as set out above, the overall proposed quantum of affordable does not comply with policy aspirations set out in Policies H4 and H5 of the Mayor's Intend to Publish London Plan, and is required to follow the viability tested route.

22 A Financial Viability Appraisal (FVA) has been submitted as part of the application, which is currently being scrutinised by Council and GLA officers to ensure the scheme provides the maximum viable amount of affordable housing. In accordance with the Mayor's Affordable Housing and Viability SPG, the Council is required to publish the financial viability assessment (including any reviews) to ensure transparency of information.

#### Viability review mechanisms

23 As with all schemes which follow the 'Viability Tested Route', the application will be subject to both early implementation and late stage viability reviews, in accordance with Policy H6 of the Mayor's Intend to Publish London Plan. Early and late-stage review mechanisms should ensure that any additional affordable housing is provided

## Page 6

on-site where sufficient surplus profit is generated, in line with the Mayor's Affordable Housing and Viability SPG.

### *Housing affordability*

24 The Mayor is committed to the delivery of genuinely affordable housing and Policy H6 of the Mayor's Intend to Publish London Plan, the Mayor's Affordable Housing and Viability SPG and the Mayor's Affordable Homes Programme 2016-21 Funding Guidance set out the Mayor's preferred affordable housing products. The applicant is advised that the Mayor's preference is for affordable rent products to be secured at London Affordable Rent benchmark levels, and for intermediate shared ownership products to be secured as affordable to a range of incomes below the upper limit of £90,000 per annum and benchmarked against the monitoring figure of £56,200 per annum in the London Plan Annual Monitoring Report. All affordable housing must be robustly secured in perpetuity, within a Section 106 agreement.

25 A draft of the S106 agreement must be agreed with GLA officers prior to any Stage II referral; example clauses are provided within the Affordable Housing and Viability SPG.

### *Phasing*

26 The phasing of the proposed scheme should be clarified, noting that the delivery of affordable housing should be secured within the first phase of the proposed development.

### Housing mix

27 London Plan Policies 3.8 and 3.11 as well as Policy H10 of the Mayor's Intend to Publish London Plan, encourage a choice of housing based on local needs with regard given to robust local evidence of need, the requirement to deliver mixed and inclusive neighbourhoods and the need to deliver a range of unit types at different price points across London.

28 The scheme proposes 191 residential units with a range of typologies and tenures, as detailed in the table below:

Unit Type	Studio	1-Bed, 2 Person	2-Bed, Four Person	3-Bed, Five Person*	Total
	10   5%	83   43%	70   37%	28   15%	191   100%

\*8 of which are provided as maisonettes.

29 The housing mix comprises a range of unit sizes including studios, 1-beds, 2-beds and 3-beds. Subject to the Council confirming the proposed mix meets the local need of the Borough, GLA Officers are supportive of the housing mix from a strategic perspective.

## Page 7

### **Urban design**

30 The design principles in chapter seven of the London Plan and chapter 3 of the Mayor's Intend to Publish London Plan expect all developments to achieve a high standard of design which responds to local character, enhances the public realm and provides architecture of the highest quality.

31 London Plan Policy 3.4 and Policy D3 of the Mayor's Intend to Publish London Plan seek to optimise the potential of sites. As per Policy D3 of the Mayor's Intend to Publish London Plan, a design-led approach to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth.

### Height, massing and architecture

32 The proposed height of the development (up to 6 storeys) has been designed to fit within the restrictions of the conical surface for RAF Northolt. The proposed height is accordingly sympathetic to the surrounding context, and it is noted the consented redevelopment of Grange Farm Estate, which is located to north of the site, fits within this same context.

33 The development has been designed to optimise the site and comprises three main plots, which are located between the Grange Farm Estate to the north and the carpark operated and managed by the neighbouring Waitrose to the south and south-east. On Plot 1, the building is located to the west and frames three courtyards; on Plot 2 a pavilion block located in the centre of the site; and on Plot 3, a linear mews steps down in height along the northern boundary of the site. The proposed massing of the proposed buildings could be acceptable subject to further consideration of the architectural detailing. Specifically, noting the length and lack of variety along the Plot 1 and Plot 3 façades, consideration should be given to the creation of added interest with further variations in materials or vertical articulation along the respective elevations. The use of brick as the primary building material is nonetheless strongly supported, and the proposed differences in brick colour between the three different plots will create some variation across the site. The material detailing should be secured through the grant of any planning permission.

### Layout

34 The use of the south-west corner of the site for vehicle access is supported, as it removes the majority of vehicles from the site (with the exception of service vehicles) and creates a predominantly pedestrianised environment. The creation of pedestrian access between the proposed site and the Grange Farm Estate to the north is strongly supported, as it provides pedestrian permeability and improved access for residents of the development, and residents in the surrounding area. This access should be secured by the Council. High quality planting, paving and lighting should be secured by the Council, and a maintenance / management strategy for this space should be secured.

35 The provision of high-quality landscaped spaces and public realm is supported and should be secured. As further discussed in the play space and transport sections of this report, to ensure the safe function of the pedestrian, play and servicing road through the middle of the site, pedestrian, cyclist and vehicle conflict should be

## Page 8

avoided through securing of suitable mitigation and a legible route. Suitable wayfinding signage and mitigation should be secured.

### Residential quality

36 London Plan Policy 3.5 and Policy D6 of the Mayor's Intend to Publish London Plan promote quality in new housing provision, with further guidance provided by the Housing SPG.

37 The proposals set out that all the units and room sizes meet or exceed minimum room standards. The proposed development will include a range of private and communal amenity spaces. The Council should also secure high-quality landscaping features within these communal and publicly accessible areas, including areas for rest and shade. Private external space is proposed for each unit in the form of balconies, terraces and private gardens, with a minimum of 5sqm of private amenity space per 1-2 bed dwelling and an extra 1sqm per additional occupant.

38 Across the scheme, 78% of units are dual aspect. While this number is relatively low, it is noted that there are no single aspect, north-facing units proposed. Furthermore, as the scheme has been designed with a pedestrian / cycle / play street through its centre, meaning that single aspect units that overlook this street are still provided with a relatively quiet aspect. Noting the proximity of the units within Plot 2 and 3 to the neighbouring Waitrose carpark, the Council should secure sufficient landscaping to provide a buffer and sufficient levels of privacy, particularly for the ground floor units and habitable rooms. Taking into account the noise considerations (further discussed in the Agent of Change section of this report), it is considered the scheme is broadly acceptable in respect of aspect.

39 The core within Plot 1 serves a maximum of 10 apartments per floor. While the applicant states that this has been reduced wherever possible, it is unclear why this floorplate is acceptable in this instance, and the number of units per core should be further reduced, in line with the Housing SPG. All other plots serve a maximum of 8 units per core which accord with Standard 12 of the Housing SPG (March 2016). The design and access statement states that all cores receive natural light and adequate ventilation. It is unclear how this is achieved in all the proposed blocks and this should be addressed by the applicant.

### Play space

40 London Plan Policy 3.6 and Policy S4 of the Mayor's Intend to Publish London Plan seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child.

41 While the application documents state out that the proposal generates a requirement of 350 sq.m. of play space using the GLA play space calculator, further information is required to enable GLA officers to assess the play space. The tenure breakdown has not been provided by unit and the information in the relevant section of the Design and Access statement is not legible due to image quality.

## Page 9

42 The proposed development includes a total of 400 sq.m of play space comprising equipped and informal play spaces located in a range of locations throughout the scheme. Specifically, door-step playable space is provided at podium level in communal courtyards and in public space. Informal play space for the 0-5 age bracket is proposed within one communal courtyard of Plot A and within a publicly accessible space. Equipped playable spaces are proposed within one communal courtyard of Plot A and within two publicly accessible play spaces. The documents also indicate play space will be provided within a "play street".

43 The provision of on-site high quality, safe, playable features for children, as well as safety measures and shaded spaces, should be secured by the Council via condition or S106 obligation. Noting that the "play street" will also be used by pedestrians, cyclists and access vehicles, mitigation measures to avoid user conflicts within this space should be secured by the Council.

44 The play strategy indicates that space for older children is proposed within the neighbouring, approved Grange Farm Estate redevelopment. The applicant is required to demonstrate that the off-site play space fully satisfies the needs of the proposed development whilst meeting the needs of residents within the approved development. Subject to addressing this requirement of the SPG, the Council should secure the off-site play provision (comprising the creation of new provision, improvements to existing/emerging play facilities and/or an appropriate financial contribution) within a S106 agreement.

45 The location of the proposed affordable housing within the scheme is required to be clarified. In accordance with Policy S4 of the Mayor's Intend to Publish London Plan, the applicant must demonstrate that the proposed play space within the communal courtyards of Plot A is not segregated by tenure and this must be secured within any planning permission.

### Fire safety

46 A fire statement has been provided with the planning application, however the statement provided does not meet the requirements of Policy D12 (part B1-6) of the Mayor's Intend to Publish London Plan. Notably, the fire statement should detail the qualifications of the assessor who has prepared the document; this should be specified within the statement. Furthermore, the statement has been prepared to confirm that the proposed development will be built to comply with the functional requirements of the Building Regulations; this does not address the policy requirements of Policy D12 of the Mayor's Intend to Publish London Plan which, in the interests of fire safety and to ensure the safety of all building users, seeks to ensure that development proposals achieve the highest standards of fire safety.

47 A revised fire statement should be secured which clearly address (in appropriate sections) the requirements outlined in Policy D12 (part B, 1-6) of the Mayor's Intend to Publish London Plan, including: construction methods and materials; means of escape for all building users; fire safety features, which reduce the risk to life; access for fire service personnel and equipment; access within the site for fire appliances; and how potential future modifications to the building will take into account, and not comprise, the base build fire safety and protection measures. Furthermore, Policy D5(b) of the Mayor's Intend to Publish London Plan sets out that,

## Page 10

in all developments where lifts are installed, a minimum of one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift; this should be suitable for use to evacuate people who require level access from the building and should be addressed and secured within the revised fire statement.

### Agent of Change

48 Policy D13 of the Mayor's Intend to Publish London Plan states that the Agent of Change principle places the responsibility for mitigating impacts from existing noise (and other nuisance-generating activities or uses) on the proposed new noise-sensitive development. Furthermore, it states that development proposals: should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances; explore mitigation measures early in the design stage, with necessary and appropriate provisions, including ongoing and future management of mitigation measures secured through planning obligations; and separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, and insulation and other acoustic design measures.

49 Due to the proximity of the neighbouring industrial uses located to the west of the site, and the introduction of residential land uses within the proposed development, Policy D13 is applicable to the proposed scheme. The application sets out that this principle has been considered in the design development of the proposal, with units located within Plot 1, at the closest point, benefiting from triple aspect as well as two primary frontages facing away from the industrial estate. Furthermore, the proposals incorporate acoustic fencing along the western boundary, and the incorporation of solid balconies screening of at least 1.2 metres to ensure that the proposed amenity spaces would be of a good quality in respect of the acoustic environment. The Council should secure mitigation measures accordingly.

### **Heritage**

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

51 Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Any harm must be given considerable importance and weight.

## Page 11

52 The site does not contain any designated heritage assets nor is the site located within a conservation area. There are no statutorily listed buildings or structures in immediate proximity to the site, however the site is located approximately 350 metres from the Mount Park Estate Conservation Area, approximately 300 metres from the Roxeth Hill Conservation Area and approximately 360 metres from the Grade II listed 29-37 Horn Buckle Close.

53 Due to the distance of the proposed development to the designated heritage assets, the proposed development's built form, and the relative scale and character of the surrounding urban form, it is not anticipated the proposed development would be visible in conjunction with the designated heritage assets and therefore would introduce no change to the respective settings of the heritage assets.

54 Having regard to the statutory duties in respect of listed buildings and conservation areas in the Planning (Listed Buildings and Conservation Areas) Act 1990, and NPPF requirements in relation to listed buildings, structures and conservation areas, GLA officers are satisfied that no harm will arise to the nearby designated heritage assets through the delivery of the proposed scheme.

55 It is considered that the proposed development is generally sympathetic to the form and scale of the surrounding context, including the nearby designated heritage assets (as considered above), and the scheme is considered to accord with London Plan Policy 7.8. and Policy HC1 of the Mayor's Intend to Publish London Plan.

### **Inclusive design**

56 London Plan Policy 7.2 and Policy D5 of the Mayor's Intend to Publish London Plan require that all new development achieves the highest standard of accessible and inclusive design and can be used safely, easily and with dignity by all. London Plan Policy 3.8 and Policy D7 of the Mayor's Intend to Publish London Plan requires that 90% of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and 10% meets Building Regulation requirement M4(3) 'wheelchair user dwellings', that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

57 The proposal states that all units have been designed to meet M4(2) requirements and 10% of units would meet M4(3) requirements. The Council should secure policy compliant levels of accessible dwellings through to the delivery stage, and that these M4(3) units are provided across a variety of housing typologies, tenure and locations within the scheme to give disabled and older people similar choices to non-disabled people.

58 As detailed in the Fire Safety section of this report, a minimum of at least one lift per core (or more subject to capacity assessments) must be a suitably sized fire evacuation lift, suitable to be used to evacuate people who require level access from the building, in accordance with Policy D5 of the Mayor's Intend to Publish London Plan.

## Page 12

### Environment

#### Energy

59 Further information is required in respect of a number of elements of the energy strategy to ensure compliance with the London Plan and Mayor's Intend to Publish London Plan. This includes information in relation to the decarbonisation strategy, Be Clean, Be Lean and Be Green elements, carbon performance and offsetting. Detailed technical comments in respect of energy have been circulated to the Council and applicant under a separate cover to be addressed in their entirety.

#### Air quality

60 The proposed development is predicted to result in a reduction in vehicle movements compared to the site's existing use, and it has been assumed that the development will not lead to adverse impacts on local air quality. The assessment has also shown that air quality for future residents of the proposed development will be acceptable.

61 The proposed development is, however, not air quality neutral and exceeds the transport emissions benchmark (TEB), and therefore does not comply with London Plan Policy 7.14 (part B(c)) and the Mayor's Intend to Publish London Plan Policy SI 1 (part B) 2a). The applicant must provide a scheme of mitigation, appropriate in scale, to address the exceedance of the TEB, or address the exceedance of the TEB in scheme design (i.e. reduce vehicle trips associated with the development).

62 The proposed development will include a communal gas boiler prior to connection to a district heat network. An assessment of the gas boiler has not been carried out as details are not yet available, however this will need to be assessed prior to occupation of the proposed development. A pre-occupation condition should be secured requiring an assessment of the impacts of the communal boiler to ensure that there are no adverse impacts on air quality at existing locations, and that future occupants are not adversely impacted by its emissions and to ensure compliance with Policy 7.14 (part B) and Policy SI 1 (part B) of the Mayor's Intend to Publish Policy.

63 Compliance with the Non-Road Mobile Machinery (NRMM) Low Emission Zone for London during the construction phase should be appropriately secured, to ensure compliance with Policy 7.14 (part Bb) and Intend to Publish Policy SI 1 (part D). Measures to control emissions during construction and demolition must be appropriately secured and implemented during the construction phase, as per paragraph 6.2 of the air quality assessment, to ensure compliance with Policy 7.14 (part Bb) and Intend to Publish Policy SI 1 (part D).

#### Urban greening and trees

64 The applicant has calculated the Urban Greening Factor (UGF) of the proposed development as 0.4, which meets the target set by Policy G5 of the Mayor's Intend to Publish London Plan. The green roofs shown for the UGF calculation do not appear to have been included in any of the planning drawings. The applicant should

## Page 13

clarify this and submit detailed drawings showing the location and design of the green roofs.

### Transport

65 It is proposed to provide 0.35 car parking spaces per unit; the approach to car parking is acceptable. The provision for Blue Badge parking and Electric Vehicle Charging Points is in line with the Mayor's Intend to Publish London and should be secured.

#### Active travel and Healthy Streets

66 The provision of pedestrian and cycle links on site, and connections to the neighbouring Grange Farm Estate, are supported and should be secured. Removing or adjusting individual parking bays of the Waitrose car park could allow for improved pedestrian links between the store, the development site and Grange Farm Estate. As such, it is recommended that options between Waitrose and the applicant are explored.

67 The level of cycle parking and its design accords with the London Cycle Design Standards and the Mayor's Intend to Publish London Plan policy and should be secured by condition.

68 The Road Safety Audit should be reviewed by the local highway authority. An assessment of collision analysis should be undertaken to ensure the scheme aligns with the Mayor's Vision Zero Action Plan.

69 An Active Travel Zone assessment is included in the Transport Assessment which shows the local environment generally scores well. This should be confirmed by the local highway authority. It is not clear how the on-site cycle route links into wider cycle routes. The applicant should work with the local authority to ensure the proposed development links into any nearby active travel improvement proposals.

#### Delivery and servicing plan

70 The assessment and measures proposed in the Transport Assessment to manage deliveries and servicing are supported and should be secured by condition.

71 An outline Construction Logistic Plan has been provided and should be secured by condition.

### Local planning authority's position

72 GLA Officers understand that Harrow Council planning officers have engaged in pre-application discussions with the applicant and are currently undertaking an assessment of the submitted planning application, including the viability information. The committee date is not yet known.

#### Legal considerations

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

#### Financial considerations

74 There are no financial considerations at this stage.

#### Conclusion

75 London Plan and the Mayor's Intend to Publish London Plan policies on land uses, housing, affordable housing, urban design, play space, Agent of Change, heritage, inclusive design, energy, air quality, urban greening and transport are relevant to this application. The below issues must be addressed to ensure the proposal complies with the London Plan and the Mayor's Intend to Publish London Plan:

- **Principle of development:** The principle of the redevelopment of an edge-of-centre retail park to provide residential uses is supported as it optimises the land and contributes towards housing delivery, in accordance with the Mayor's Intend to Publish London Plan Policies SD6, SD7, SD8, E9 and H1. The loss of retail uses does not raise strategic concern.
- **Affordable housing:** The scheme proposes 10% affordable housing by habitable room, with a tenure split of 60% low-cost rent housing and 40% intermediate housing. The provision of 10% affordable housing falls significantly below the threshold level of affordable housing set out in the Mayor's Intend to Publish London Plan and, prior to the independent verification of the viability position, is wholly unacceptable. The applicant's viability assessment will be robustly scrutinised by GLA Officers to ensure the scheme provides the maximum reasonable amount of affordable housing. Early and late stage viability review mechanisms, and affordability levels should be secured.
- **Design:** The proposal seeks to optimise the site and the proposed building heights are sympathetic to the surrounding context. The massing of the proposed buildings could be acceptable subject to further consideration of the architectural detailing. Further consideration should be given to elements of residential quality, and further information is required in relation to the proposed play strategy. A revised fire statement must also be provided, evidencing compliance with Intend to Publish London Plan Policy D12.

#### Page 15

- **Energy:** Further information is required in respect of a number of elements of the energy strategy to ensure compliance with the London Plan and Mayor's Intend to Publish London Plan. This includes information in relation to the decarbonisation strategy, Be Clean, Be Lean and Be Green elements, carbon performance and offsetting.
- **Air quality:** The proposed development is not air quality neutral and exceeds the transport emissions benchmark (TEB). A scheme of mitigation, which is appropriate in scale, must be provided to address the exceedance of the TEB, or address the exceedance of the TEB in scheme design. Conditions should be imposed to ensure the development does not lead to adverse impacts on local air quality.
- **Urban greening:** The green roofs shown for the UGF calculation do not appear to have been included in any of the planning drawings. The applicant should clarify this and submit detailed drawings showing the location and design of the green roofs.
- **Transport:** Options for improved pedestrian access to the site, as well as links from the proposed on-site cycle route into wider cycle routes, should be reviewed and improved. An assessment of collision analysis should be undertaken. A delivery and servicing plan, and construction logistics plan should be secured by condition.

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