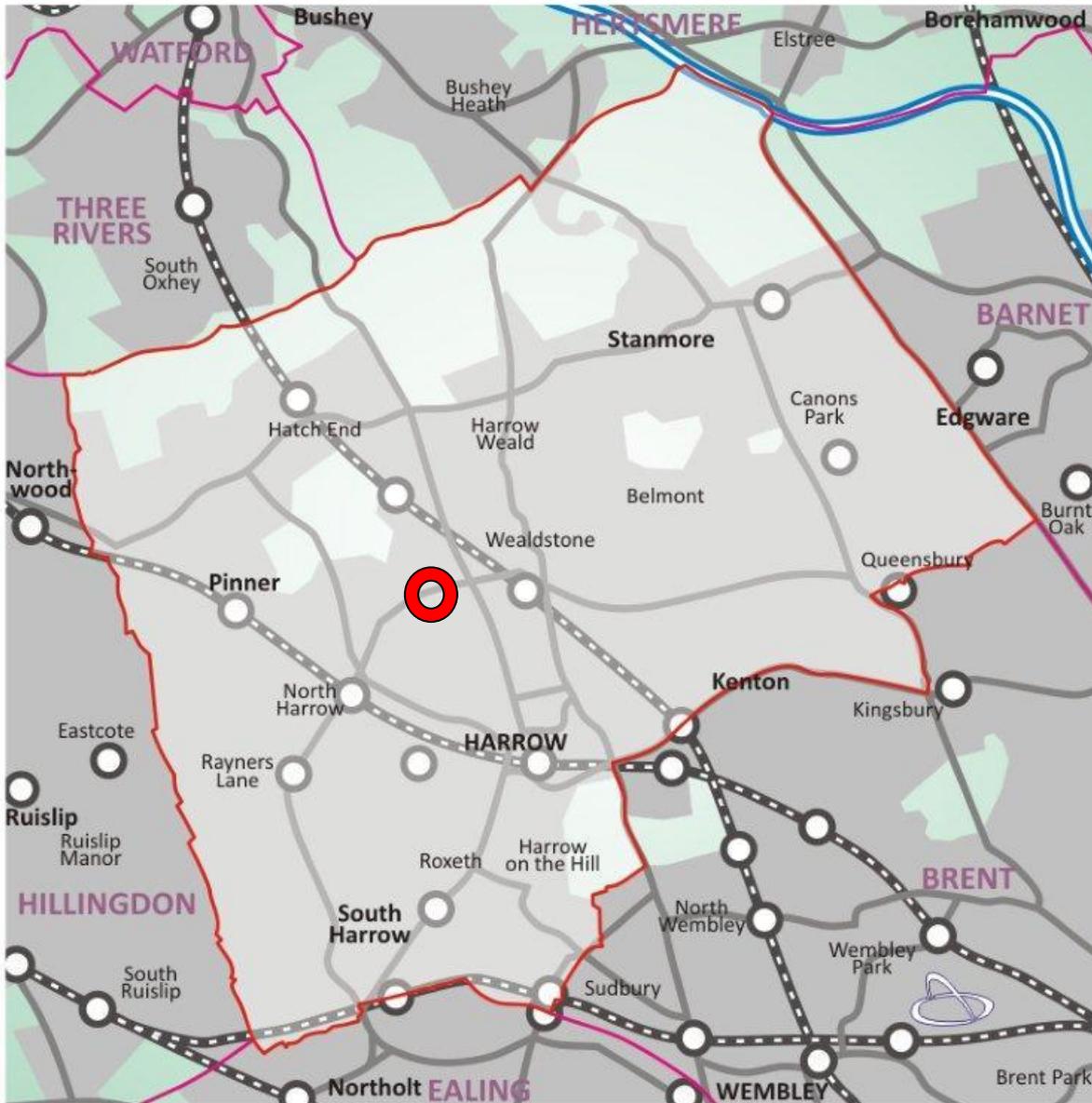
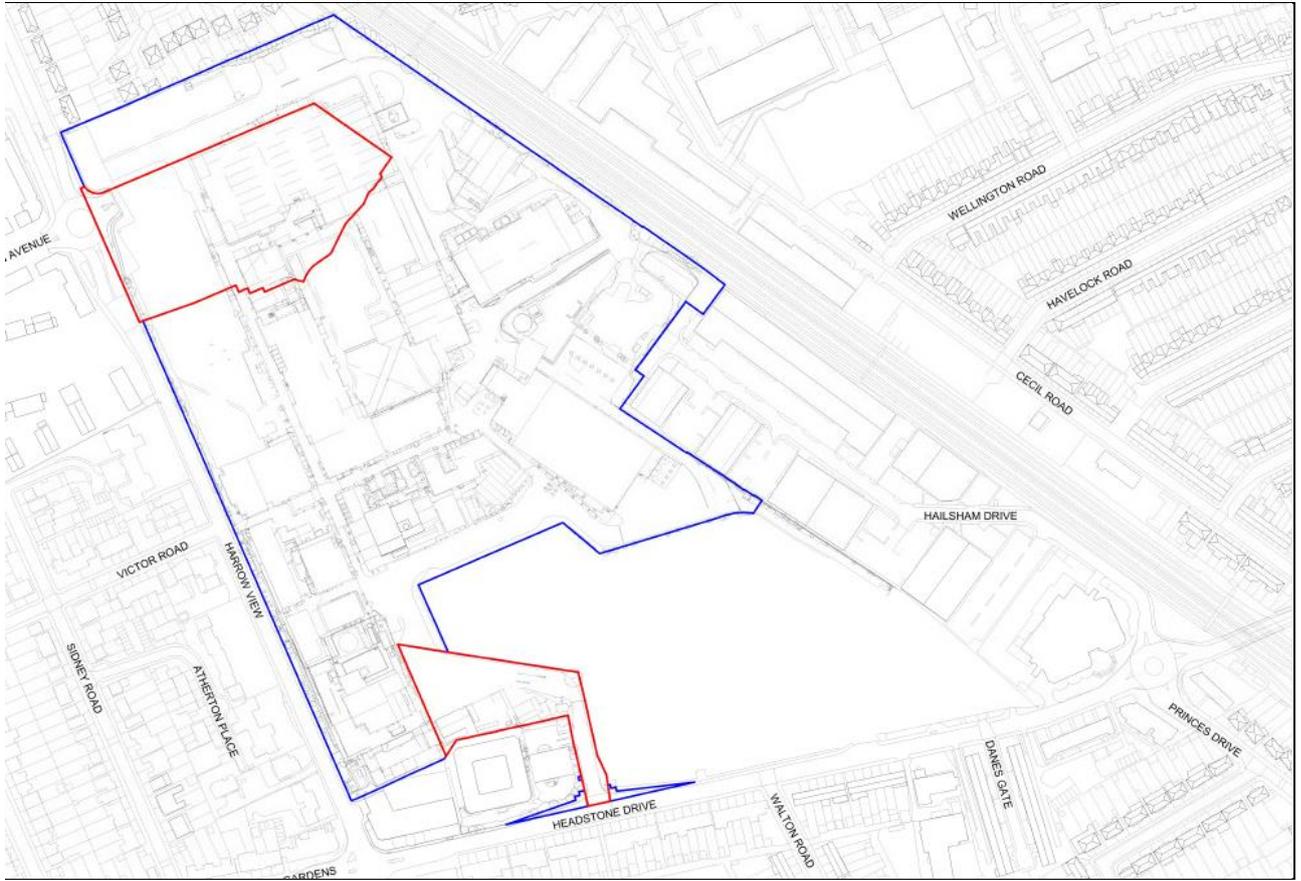


 = application site



<p><b>Plots B1 and C1 (Development Zones B and C)</b> <b>Harrow View East Masterplan Site (Former Kodak Factory Site),</b> <b>Headstone Drive, HA1 4TY</b></p>	<p><b>P/4581/20</b></p>
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# HARROW VIEW EAST Plots B1 & C1



## LONDON BOROUGH OF HARROW

### PLANNING COMMITTEE

14<sup>th</sup> April 2021

**APPLICATION NUMBER:** P/4581/20  
**VALID DATE:** 17/12/2020  
**LOCATION:** PLOTS B1 AND C1 (DEVELOPMENT ZONES B AND C) OF HARROW VIEW EAST MASTERPLAN SITE  
**WARD:** MARLBOROUGH  
**POSTCODE:** HA1 4TY  
**APPLICANT:** HARROW VIEW LLP – MR TOM OXLEY  
**AGENT:** CARTER JONAS  
**CASE OFFICER:** MATT KOLASZEWSKI  
**EXPIRY DATE:** 30/04/2021

### PROPOSAL

Full planning application for the development of Plots B1 and C1 at Harrow View East (former Kodak Factory) for residential dwellings, retail and community floorspace together with associated car and cycle parking, open space, landscaping and ancillary development including all necessary infrastructure works.

Details Include: Building height ranging from 5 - 14 storeys and comprising 474 Residential units; Retail floorspace 456sqm (Use Class E); Flexible Community uses 649sqm (Use Classes E, F1 and F2)

### RECOMMENDATION

- 1) Agree the reasons for approval as set out in this report, and
- 2) Refer this application to the Mayor of London (the GLA) as a Stage 2 referral; and
- 3) Subject to the Mayor of London (or delegated authorised officer) advising that he is content to allow the Council to determine the case itself and does not wish to direct refusal, or to issue a direction under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application, delegate authority to the Interim Chief Planning Officer in consultation with the Director of Legal and Governance Services for the completion of the Section 106 legal agreement and other enabling development and issue of the planning permission, subject to amendments to the conditions, including the insertion or deletion of condition as deemed fit and appropriate to the development or the amendments to the legal agreement as required. The Section 106 Agreement Heads of Terms would cover the following matters:

- 1. Affordable Housing**
  - Provision of 180 affordable homes: 71 shared ownership and 109 affordable rent.
  - 10% of affordable rent accommodation to be constructed and ready for occupation as wheelchair standard home.
  - Early stage review
  
- 2. Carbon Offset**
  - Payment of a total financial contribution of £685,669 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 £95 per tonne of carbon to be offset per year, over a 30 year period.
  
- 3. Design Scheme**
  - To use reasonable endeavours to employ the main scheme Architect on an overseeing/ executive role until practical completion.
  
- 4. Energy Centre**
  - Connection of each phase to the Energy Centre on the wider Harrow View East masterplan site.
  - Provision of a safeguarding route to a connection to any future wider District Heat Network.
  
- 5. Community Uses**
  - Delivery of 649sqm of community floor space.
  - Process for the provision of the community space to the Council in the first instance.
  
- 6. Highways and Parking**
  - (a) Travel Plan**
    - Submission of a travel plan based on the framework travel plan for each of Plots B and C prior to occupation and to cover an initial monitoring period of 5 years
    - Appointment of a travel plan co-ordinator.
  
  - (b) Parking – Car Club Provision**
    - Provision of one car club parking space within the site boundary
    - To enter into an agreement with an approved car club operator to operate the car club
  
  - (c) Highways Agreement**
    - To use reasonable endeavours to enter into a Section 38 Agreement under the Highways Act 1980 (if deemed necessary)

## **7. Employment and Training Plan**

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

## **8. Public Art**

- Submission of a strategy to deliver public art on site up to the value of £200,000.

## **9. Securement of Leisure use in Plot D5 (of wider masterplan)**

- Applicant to use reasonable endeavours to secure a leisure use within Plot D5 of the wider masterplan site (or such other plot as may be agreed with the Council), subject to receiving all necessary and relevant consents.

## **10. 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

## **REASON FOR THE RECOMMENDATIONS**

The principle of development on the former factory site has been established under outline planning application permission P/2165/15 which was approved by the Planning Committee in 2015. The outline permission was granted with all matters reserved for a comprehensive mixed use redevelopment of the Kodak Factory Site. The applicant owns Development Zones B to D of the masterplan site and has already secured reserved matters permissions for development plots B1, C1 and D7 to bring forward the substantive section of the green link on the approved masterplan site and a total of 810 new homes, leisure and community floor space as well as a new energy centre located on Plot D8.

This application solely relates to development plots B1 and C1 located within Development Zones B and C of the approved masterplan site.

The redevelopment of the site would enhance the urban environment in terms of material presence, attractive streetscape, and good routes, access and makes a positive contribution to the local area, in terms of quality and character. The massing and scale proposed would appropriately relate to the wider masterplan site and would permit full optimisation of this previously developed land to bring forward much needed housing which would positively add to the Council's housing delivery targets.

The proposal would secure the provision of affordable housing at a level that meets the minimum affordable housing target set out in the development plan.

The layout and orientation of the buildings and separation distance to neighbouring properties is considered to be satisfactory to protect the amenities of the neighbouring occupiers and the development would contribute towards the strategic objectives of reducing the carbon emissions of the borough.

The decision to grant planning permission has been taken having regard to the National Planning Policy Framework (2019), the policies of The London Plan (2021), Harrow's Core Strategy (2012), the policies of the Harrow and Wealdstone Area Action Plan (2013) and the policies of the Harrow Development Management Policies Local Plan (2013), as well as to all relevant material considerations including the responses to consultation.

## **INFORMATION**

This application is reported to Planning Committee as it would be a major development. The application is therefore referred to the Planning Committee as it does not fall within any of the provisions set out at paragraphs 1(a) – 1(h) of the Scheme of Delegation dated 12th December 2018.

Statutory Return Type:	All other Largescale Major Development
Council Interest:	None
Net Floorspace:	38,607 sqm
GLA Community Infrastructure Levy (CIL) Contribution (provisional):	£2,316,420
Local CIL requirement:	£6,115,348.80

## **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**

Policy D11 of The London Plan (2021) and Policy DM1 of the Development Management Policies Local Plan require all new developments to have regard to safety and the measures to reduce crime in the design of development proposal. It is considered that the development does not adversely affect crime risk. However, a condition has been recommended for evidence of certification of Secure by Design Accreditation for the development to be submitted to and approved in writing by the Local Planning Authority before any part of the development is occupied or used.

## **1.0 SITE DESCRIPTION**

- 1.1** This reserved matters application specifically relates to two parcels of land (total circa 2.19 ha) located within the southern and northern section of the overall factory site and known as development Plots B1 (northern half only) and C1 for the purposes of the masterplan approved under outline permission P/2165/15. The site already benefits from reserved matters approval granted under P/3892/18, which grants permission for 350 new homes and leisure and community floor space.
- 1.2** The wider masterplan site was previously occupied by Kodak Factory which included a range of industrial, logistical and administrative office buildings including the main powerhouse chimney, which is the tallest structure on the site. With the exception of the main chimney, which is to be retained and the administrative office, all of the previous factory buildings have now been demolished. Development has already commenced on development plot D7 owned by the applicant and will deliver 460 new homes. Planning permission was granted under P/3944/19 for plots D1, D2, D4, D5 and D6 to provide 1,226 new homes and flexible commercial floorspace.
- 1.3** The northernmost and easternmost part of the Kodak industrial site and a small section of land located on the southwest corner of the site are designated as a Strategic Industrial Location (SIL) in the Harrow and Wealdstone AAP and the Harrow Local Area Map.
- 1.4** The site lies within the wider Harrow and Wealdstone Opportunity Area, as defined in the London Plan and in terms of area is the largest strategic site in this designation. In addition, the site falls within the Wealdstone West sub area Site 2 (Kodak and Zoom Leisure). The site allocates a minimum output of 1,230 jobs and 985 new homes to be achieved through a comprehensive mixed use led redevelopment of the site.
- 1.5** On the eastern edge of the masterplan site, adjacent to the railway line and to the north of the Waverley Industrial estate, is the underground bunker element of a former Air Ministry citadel building, which is locally listed.
- 1.6** The wider site slopes up from south to north, with maximum levels difference of approximately 6.2 metres. There is a drop in levels from the site down to Harrow View of between 1 and 1.5 metres.
- 1.7** The site benefits from two existing vehicle accesses, one from Harrow View and the principal access from Headstone Drive, adjacent to Kodak's existing Reception Building.
- 1.8** The site contains a number of protected trees, including a row of Limes adjacent to the western boundary of the site with Harrow View.

## **2.0 PROPOSAL**

**2.1** The proposed development seeks full planning permission for Plots B1 and C1 for 474 residential new homes (use class C3); 456sqm retail floorspace (Use Class E); 648 sqm flexible community uses (use classes, E, F1 and F2). The proposed development would also include associated car parking, open space, landscaping and ancillary development including necessary infrastructure works.

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

### **Plot B1**

**2.3** Plot B1 would comprise of two blocks referred to as Blocks A1 and A2 and have been arranged to align with the existing commercial buildings. Block A1 would be 9 storeys in height and would comprise 42 residential units, 7 of these have been designed as wheelchair accessible units. Block A2 would be 6 storeys in height and would comprise 32 residential units. Both blocks would provide an additional storey to that already approved under reserved matters permission P/3892/18. A total of 74 residential units would be provided on this plot, all of which would be London Affordable Rent units.

**2.4** 10 standard residential parking spaces, 1 motorcycle space and 3 accessible spaces totalling 14 are also proposed. All the parking spaces would be provided on-street. Cycle parking is also included and comprises: 136 long-stay and 3 short-stay spaces.

### **Plot C1**

**2.5** Plot C1 proposes 400 residential units and includes Block G at its western edge and Block H at the eastern end. Of the units proposed 106 would be affordable units comprising: 71 shared ownership and 35 London Affordable Rent. Plot C1 would also incorporate 649 sqm (GIA) of community space and 456 sqm (GIA) of retail floorspace (to replace previously approved 768 sqm leisure floorspace). The replaced leisure floorspace would be swapped back into the non-residential space in the recently permitted D1-D6 permission. (P/3944/19). Plot C1 comprises of 9 buildings within two urban cores, known as G1-G4 and H1-H5 respectively:

- Block G1 – 7 storeys in height and comprise 46 dwellings, all of which would be for market sale (8 wheelchair accessible units);
- Block G2 – 7 storeys in height and would comprise 35 dwellings, all of which would be for market sale.
- Block G3 – 5 storeys in height and comprise 35 dwellings; of which 13 would be shared ownership and 22 units would be for market sale.
- Block G4 – 6 storeys in height and comprises 39 dwellings; all of which would be for market sale.
- Block H1 – 14 storeys in height (tallest building on site) and comprises 69 dwellings, all of which are for market sale (7 of which are wheelchair accessible);

- Block H2 – 5-9 storeys in height and comprises 50 dwellings; of which 10 are shared ownership and 40 would be for market sale. This block would include 6 wheelchair accessible units.
- Block H3 – 7 storeys in height and comprises 35 dwellings; all of which would be affordable (London Affordable Rent); including six wheelchair accessible units.
- Block H4 – 7-10 storeys in height and comprises 48 dwellings; all of which would be shared ownership, of which 4 would be wheelchair accessible.
- Block H5 – 6 storeys in height comprising 43 dwellings; all of which would be for market sale, of which 3 are wheelchair accessible.

**2.6** Overall, Plot C1 would comprise the following unit mix: 5 x studio apartments; 166 x 1 bedroom / 2 person units; 186 x 2 bedroom / 4 person units; 22 x 3 bedroom / 4 person units and 9 x 3 bedroom / 5 person units and 1 x 4 bedroom / 6 person units. A total of 41 wheelchair accessible units are proposed.

#### **Other uses**

**2.7** A convenience retail store comprising 465 sqm (GIA) would be located on the ground floor of Block G2.

**2.8** A community use totalling 649 sqm (GIA) within three units are proposed on the ground floors of Blocks G1, G4 and H1 (measuring 229.4 sqm (GIA), 218.3 sqm (GIA) and 200.9 sqm (GIA) respectively).

**2.9** Two podium gardens are provided at the centre of each urban block (G and H). The proposed development would also provide 125 residential car parking spaces across Plot C1, including 103 spaces across two underground car parking podiums and 22 on-street spaces. 1 car club space is proposed and 9 non-residential on-street parking spaces (inclusive of two spaces within a loading bay). Cycle comprises; residential: 718 long-stay and 13 short-stay; retail: 3 long-stay and 13 short-stay; and community use: 3 long-stay and 8 short-stay.

**2.10** In total, the proposed development comprises 474 units, 48 wheelchair accessible units, of which 180 would be affordable (40% of total units by habitable room). 152 residential car parking spaces and 9 non-residential spaces. 31 active electrical vehicle charging and 1 car club space.

## 3.0

**RELEVANT PLANNING HISTORY**

P/3405/11	Outline planning application for a comprehensive, phased, mixed use development of land at Harrow View and Headstone Drive, as set out in the Development Specification (March 2012). The development comprises the demolition of existing buildings and structures (with the exception of the chimney and part of powerhouse) and redevelopment of the site for a mix of uses comprising business and employment uses (within Use Classes B1(a), B1(b), B1(c), B2 and B8 - up to 35,975sqm); residential dwellings (within Use Class C3 - up to 985 units); student accommodation (Sui Generis use - up to 220 units); senior living accommodation (within Use Class C2); assisted living care home (within Use Class C2) (total C2 uses up to 9,300sqm); retail and restaurant uses (within Use Classes A1, A2, A3, A4 and A5 - up to 5,000sqm); commercial leisure uses (Use Class D2); community uses (Use Class D1); health centre (Use Class D1); a primary school (Use Class D1) (total D1/D2 uses up to 8,830sqm); energy centre (Sui Generis use - up to 4,500sqm); together with new streets and other means of access and circulation; highway improvements; associated parking; re-profiling of site levels; utilities diversions and connections; open space; landscaping and ancillary development including infrastructure, works and facilities.	Granted: 21/12/2012
P/2182/15	Modification to section 106 planning agreement relating to planning permission P/3405/11 dated 21 December 2012 as varied by a deed of variation dated 22 December 2014 to define and split the obligations between the East Land (Harrow View East) and West Land (Harrow View West)	Granted 09/12/2015
P/2165/15	Outline planning application (all matters reserved) for a comprehensive, phased, mixed use development of land at Harrow View and Headstone Drive (known as Harrow View East), as set out in the Development Specification (September 2015). The development comprises the	Granted 09/12/2015

	demolition of existing buildings and structures (with the exception of the chimney and part of powerhouse) and redevelopment of the site for a mix of uses comprising business and employment uses (within Use Classes B1(a), B1(b), B1(c), B2 and B8) (up to 32,360 sqm); residential dwellings (within Use Class C3) (up to 1800 units); senior living accommodation and assisted living care home (both within Use Class C2) (up to 10,230 sqm); foodstore (within Use Class A1) (up to 2,000sqm); Flexible active uses (within Use classes A1-A5, B1a and D1) (up to 2,000 sqm); leisure and community uses including commercial leisure uses (Use Class D2); Community uses (Use Class D1), health centre (Use Class D1); a primary school (Use Class D1) (total D1/D2 uses up to 9,730sqm); energy centre (Sui Generis use)( up to 600sqm) (including an interim energy centre in Phase C (up to 200sqm); together with new streets and other means of access and circulation; highway improvements; associated parking (including a multi-storey car park (Sui Generis use)(up to 8,900sqm)); re-profiling of site levels; utilities diversions and connections; open space; landscaping and ancillary development including infrastructure, works and facilities.	
P/4367/17	Non-material amendment to planning permission P/2165/15 dated 09/12/2015 to allow changes to access points, the green link, height locations and phasing boundaries.	Approved 20/12/2017
P/5244/17	Demolition of the existing building surrounding the factory chimney; retention of existing chimney and construction of a new single and two storey building comprising an energy centre (Sui Generis) and a flexible community space (Use Classes D1/D2)	Granted 05/02/2018
P/5079/17	Approval of all reserved matters for development plot D7 and the Green Link of Development Zone D of the Harrow View East Masterplan and details pursuant to conditions 7(Urban Design Report), 8(Energy Strategy), 9(Ecology and Biodiversity Strategy), 11(Housing Schedule), 12(Daylight and Sunlight Assessment), 13(Surface Water Drainage Strategy), 14(Accessibility Strategy), 15(Lighting	Granted 02/02/2018

	Strategy), 16(Refuse Strategy), 17(Noise and Vibration Strategy), 18(Arboricultural Strategy), 19(Landscaping), 20(Transport Strategy), 21(Levels), 22(Open Space Strategy) following outline planning permission granted under P/2165/15 dated 09.12.2015 for the comprehensive phased, mixed use development of land bounded by Harrow View and Headstone Drive (known as Harrow View East)	
P/3004/18	Non-material amendment to planning permission P/2165/15 dated 9/12/2015 to correct factual inaccuracies associated with the approved parameter plans and enable non-material changes to the approved parameter plans (zonal boundaries, limits of deviation and building heights)	Approved 03/08/2018
P/4046/18	Non-material amendment to outline planning permission P/5079/17 dated 2/2/18 to enable amendments to the approved reserved matters plans (FFLs for all blocks, window positions, window and door types, internal layout of homes, Block B gallery access, Block F1 communal entrance, perforated panels to the podium, boundary wall and re-location of existing substation)	Approved 09/07/2019
P/3892/18	Approval of all reserved matters for development Plots B1 and C1 and sections of the Green Link of Development Zones B and C of the Harrow View East Masterplan and details pursuant to Conditions 7 (Urban Design Report), 8 (Energy Strategy), 9 (Ecology and Biodiversity Strategy), 11 (Housing Schedule), 12 (Daylight and Sunlight Assessment), 13(Surface Water Drainage Strategy), 14 (Accessibility Strategy), 15 (Lighting Strategy), 16(Refuse Strategy), 17 (Noise and Vibration Strategy), 18 (Arboricultural Strategy), 19(Landscaping), 20 (Transport Strategy), 21 (Levels), 22 (Open Space Strategy) following outline planning permission granted under P/2165/15 dated 09.12.2015 for the comprehensive phased, mixed use development of land bounded by Harrow View and Headstone Drive (known as Harrow View East)	Approved 06/12/2018
P/3944/19	Full planning application for the development of Plots D1, D2, D4, D5 and D6 at Harrow	Granted 06/11/2020

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

4.1 A total of 1256 consultation letters were sent to neighbouring properties regarding this application which commenced on 22 December for a period of 28 days. The consultation period expired on the 19<sup>th</sup> January 2021. A re-consultation due to administrative letter error 10 February 2021 for a period of 21 days was carried out.

4.2 A site notice was posted on 23<sup>rd</sup> December 2020 in six separate locations. A Harrow Times advert was published on the 31<sup>st</sup> December 2020. The reason for the advertisement is because the application relates to a major development.

4.3 10 objections have been received so far and are summarised below.

#### **Consultation Responses**

##### **Character and Appearance**

- Over 5 storeys in building height would be out of keeping with the surrounding heights of buildings in the area;
- The additional height risks ‘warehousing’ the site, damaging the balance between residential blocks and green space.
- Impact on residents already occupying the site who bought the properties on the basis of the plans at the time.
- Risk of overdevelopment of site if such development continues.
- Strongly object to the 14 floors and it should only be 5-7 floors.
- Degradation of character of the area. Huge concrete blocks would be eye sores.

*Officer response: Please refer to section 6.4 Character and Appearance of the area. The wider masterplan of the site comprises buildings of 18 storeys; on this basis the LPA consider the proposed additional height appropriate in this context and the application is considered to comply with the London Plan 2021 ‘Tall Buildings’ policy D9.*

##### **Car Parking & Highways**

- There is already a shortage of car parking within the development. Although the development maintains a 0.3 spaces per resident it is unsatisfactory.
- Development will result in overflow on-street parking.
- Excessive load on traffic and other amenities adding congestion to the area. There are already queues to Uxbridge Road roundabout and given the additional load coming onto the junction near the front of Harrow View Site, it will exacerbate the situation.
- Impact on Pinner Park Avenue would be huge particularly during peak hours in terms of traffic and congestion.

*Officers Response:*

*This is covered in Section 6.7 relating to Traffic and Highways. The Council's Highways Officer has reviewed all the supporting documents and considered the wider implications of the proposed development on the surrounding area. A number of planning obligations and highway measures have been proposed to ensure that parking stress and congestion is minimised as a result of the development.*

**Public Realm**

- The development would reduce open space, green space and residential space per unit.

*Officer response: Please refer to section 5.4 character and appearance of the area.*

**Crime**

- In residential blocks within close proximity to each other petty crimes will increase.
- Tower blocks tend to fall into low states of repair and become local ghettos for low level crime and have a negative impact on neighbouring residents.

*Officer response: The planning application has been reviewed by the Secure By Design Officer and has recommended Secure by Design accreditation is attained to ensure the safety of the area.*

**Noise**

- The development could have a negative impact on Her Majesty's Courts and Tribunal Service (HMCTS) and the operation of the courts. A Construction Management Plan (CMP) must take into account the operational needs of the court and, where necessary, appropriate noise mitigation and management must be implemented during the demolition, construction and operation of the proposed development to ensure that the operation of the courts is not unreasonably restricted as a result of the proposed development.
- High tower blocks would add significant noise levels.

*Officer response:* A Construction Mngement Plan condition is proposed. This will ensure that the construction of the development would not cause undue harm to adjoining premises etc.

**Residential Amenity**

- Loss of privacy due to overlooking large buildings.
- Sense of enclosure to apartments making it feel like a ‘concrete jungle’

*Officer response:* This has been addressed within the Residential Amenity Section of the report.

**Local Infrastructure**

- Inadequate investment in local roads, public transport, local services, such as doctors surgeries, schools and dentists etc.

*Officer response:*

*A number of Section 106 obligations have been included in relation to local transport services. Furthermore, a Community Infrastructure Levy has been applied to this development which will be used to provide local infrastructure to support the new development.*

**Non-Planning Matters**

- Water pressure has dropped again after the Harrow View West development. Specific actions to ensure the water pressure is maintained in the surrounding vicinity should be incorporated.
- Breaking trust with the neighbours.

*Officer response:* Please note that the above issues are not planning matters and therefore would not substantiate a reason for the refusal of this application.

**4.4 Statutory and Non-Statutory Consultation**

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

**Consultation Responses**

**LBH Highways**

The proposal for an increase in residential units does not appear to result in a severe or harmful impact for the surrounding highway network and mitigation measures have already been secured in order to minimise the impact and also improve facilities for new and existing residents however, further information is required on the overall impact on public transport. Subject to receipt of satisfactory information, conditions are required for a detailed construction logistics plan (pre-commencement), detailed delivery and servicing plan and car park management plan (pre-occupation).

- The proposed levels of cycle parking are acceptable;
- Public Transport – there are various bus stops around the perimeter of the site. S106 contributions have already been secured to provide improvements to facilities and bus services eg. Countdown, shelters and extra buses.
- Car Club – there is already one space available on the development at plot D7 and a further space is proposed on-street within plot C1. This facility should help to reduce car parking demand by giving residents who only occasionally use a car an alternative to private car ownership.
- Local Highway Network – the development is not within a Controlled Parking Zone at present. Residents of this development will not be eligible for permits for the surrounding CPZ's. S106 contributions have already been secured to enable the Council to investigate the need to introduce further measures in the surrounding areas to mitigate against the likely impact. It is anticipated that a CPZ may be sought for the development itself in order to deter commuters from parking on the adopted roads as the site is a short distance from Harrow & Wealdstone Station.
- Proposed Car Parking – the development is intended to be 'car lite.' Future residents are expected to predominantly travel by non-car modes, therefore, low levels of parking have been agreed across the site.
- S106 contributions have already been secured that will be used to address many of the issues identified at the ATZ 'concern' locations. Any that are not included can be considered by ward Councillors for possible remedial work.
- Vision Zero – Road safety conditions are generally good in the surrounding area. It is agreed that at present, it would be best to continue monitoring this junction as the safety records are not at a level of concern.
- Trip Generation – The assessments show that the proposal would result in an increase in trips over those already agreed for these plots. B1 is expected to see an additional 83 two-way trips per day and C1 an extra 651 two-way trips per day. This is a 35% increase in trips on the RMA figures.
- Impact Assessment – The increase in vehicle trips is considered to be negligible at less than 15 additional two-way trips in both peak hours (over that already approved in the RMA). It does seem that there is sufficient provision of bus services however, TfL would need to confirm that there is still sufficient capacity on these services to cater for this amount of trips plus those generated by the rest of the Harrow View east and west developments. The expected impact on rail/Underground services appears low, again due to this application being for a relatively modest uplift for two plots. As the assessment does not take into account the impact of the entire development, it is not possible to determine the likely impact that this additional proposal would have on capacity.
- Borough Impacts – funds have already been secured to address the potential impact of the redevelopment of this site and it is not

considered that this proposal would result in the need for any extra contributions.

### **LBH Economic Development**

As a major application, we will be seeking the following to be included in any s106 agreement:

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

In addition, it is essential that s106 contributions agreed as part of the outline application (linked to the initial Land Securities application P/3405/11) are carried through as appropriate into subsequent applications as the cost of the s106 contributions should fall across all phases and sites. For the purposes of this application, particular attention is drawn to the “Town Centre Contribution” and the “Construction Training Contribution”.

### **LBH Drainage**

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

We can confirm that the Flood Risk Assessment and drainage strategy submitted are satisfactory, however the following details are still required and can be conditioned.

- the green roof details which includes the cross section of green roof construction and their maintenance plan should be submitted.
- foul water discharge level consented by Thames Water should be submitted.

### **LBH Housing Officer**

Provision of 40% affordable housing by habitable room (38% by unit) is strongly supported. Affordable tenure split of 62.3% London Affordable Rent by habitable room and 37.7% intermediate by habitable room, is also strongly supported.

Housing’s priority need is for 2 bed and 3 bed London Affordable Rent units. This is reflected in our target bed size mix for London Affordable Rent units of 40% for each of these bed sizes. In terms of the proposed bed size mix of the London Affordable Rent units, when compared to Housing’s target mix, the provision of 47% 2b4p units is welcomed. However there is an overprovision of 1b2p (37%) units against our target mix (10%), resulting in under provision of 3 bed and larger units (16%). This is disappointing given the identified need for family units of this bed size.

Wheelchair accessible unit provision in the London Affordable Rent is 13 wheelchair units out of 109 affordable rented units. So that’s 11.9% which is in excess of the 10% target and half of them are 2b4p units (the others being 1b2p) which meets wheelchair housing priority need for 2 and 3 bed wheelchair units.

In terms of affordability, the 1 bed units, being at an income requirement of £53,750, are slightly over our target income level of £49,000 but this is considered acceptable. The 2 and 3 bed unit income levels meet the Council's current income/affordability target.

Overall, this proposal is supported by Housing.

**LBH Planning Policy Officer**

No comments received

**LBH Urban Design Officer**

This is a well-designed residential development which will make a good place to live in Harrow. It was presented at two design review panels (DRP) in September 2020 and November 2020. The DRP support the proposal and judge it to be a high-quality scheme. Maintaining the design quality of the original scheme for these sites whilst increasing the density has been challenging. 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.

**LBH Biodiversity Officer**

The new proposals will increase pressure on the site simply from the number of people, their activities and pets so the likelihood of delivering promised gain levels or for the site to contribute positively to the local ecological network is reduced compared to the previous scheme. Contribute to the retro greening of some other area(s) within the neighbourhood as a condition would be advisable.

**LBH Landscape Architect**

No objection subject to hard and soft landscape conditions.

**Greater London Authority**

Please refer to the Stage 1 Report attached as Appendix 5.

**Secured by Design**

We have met with the architects from Pollard, Thomas and Edwards with regards to Secured By Design, and they display an aspiration to achieve an SBD accreditation.

Compartmentation on all floors, for all blocks with 25 or more flats will be required for the required Secured By design award. A number of tested and certified security doors will need to be added to the submitted plans to make compartmentation possible.

Concerns that the podium gates have moved from the agreed compromised locations, or have disappeared on some of the submitted plans and that the stairs leading up to the podium gardens could become Anti-social behaviour hotspots. These stairs need to be fully visible and have good naturally active and visibility. The gates would be preferred at the bottom of the stairs. The development will not be able to achieve secured by design without the required gates preventing non-resident's access to the podium gardens.

A list of required security standards for these developments was sent on 4th November 2020 to Paul Hohnen of Pollard, Thomas, Edwards.

If this list is fully adhered to and the extra doors added to the blocks to achieve the required compartmentalisation and podium access gates are installed and there are no dead space areas around the gates or stairs which could be exploited, for crime or ASB, then the required Secure By Design award should be obtainable.

**Historic England**

No comments

**Natural England**

No comments

**Transport for London**

Comments incorporated within the GLA Stage 1 Report attached as Appendix 5.

**London Underground Limited**

No comments to make on this planning application.

**Thames Water**

No comments received

**Network Rail**

No comments received

**Ministry of Defence**

MOD has no safeguarding concerns with the heights of the development.

The principal safeguarding concern of the MOD in relation to this development in the vicinity of RAF Northolt relates to the potential increase in birdstrike risk to aircraft operations. To address the potential of the development to provide a desirable habitat for hazardous birds, the MOD request that conditions are attached to any permission granted requiring the submission and approval of:

- Bird Hazard Management Plan (BHMP);
- Landscaping scheme (in consultation with the MOD) prior to commencement;
- Drainage details and mitigation methods to address the potential for surface water drainage to provide an attractant or supportive environment for those species hazardous to aviation.

Noise

The MOD advises that the proposed development will be exposed to noise from aircraft activities at RAF Northolt, which some residents, when living on the development, may find disturbing. Subject to the above design requirements being implemented as part of any planning permission granted, the MOD maintains no safeguarding objection to this application.

**Brent Council**  
No Objection

**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 2021, 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**      A full list of all the policies used in the consideration of this application is provided as Informative 1 in Appendix 1 of this report.

## **6.0 ASSESSMENT**

**6.1** The main issues are;

- Principle of Development
- Environmental Impact Assessment
- Character and Appearance of the Area
- Fire Strategy
- Impact to Residential Amenity
- Housing Output and Affordable Housing
- Traffic, Parking, Access, Servicing and Sustainable Transport
- Development and Flood Risk
- Trees, Ecology and Biodiversity
- Energy & Sustainability
- Land Contamination
- Air Quality/ Wind Climate
- Statement of Community Involvement
- Section 106 Obligations
- Consultation Responses

## **6.2 Principle of Development**

**6.2.1** The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2021): D3, H1, H6, E9
- Harrow Core Strategy (2012): CS1
- Harrow and Wealdstone Area Action Plan (AAP): AAP1, AAP3, AAP5, AAP13, AAP17
- Harrow Development Management Polices Local Plan (2013):DM1, DM2, DM35, DM46

### Wider Masterplan Site

**6.2.2** The principle of redevelopment of the Kodak factory site has been long established through the approval of two outline permissions under refs: P/3405/11 and P/2165/15 for the comprehensive phased mixed re-development of the former factory site. Further to the outline permission granted under P/2165/15, the applicant sought a non-material minor amendment application (s.96a application) under ref: P/4367/17 to correct inaccurate measurements annotated on the approved parameter plans and referred to in the approved Specification and Guideline Documents. This application followed a detailed survey of the site which established that the onsite measurements did not correlate with the approved parameter plans. This application was approved in October 2017. Following this s.96a application, a further s.96a application (Ref: P/5023/17) was submitted and subsequently approved in December 2017. The amendments in this later application are the same as that approved under application P/4367/17,

save that a minor adjustment has been made between the development plot boundary shared between zones B and D to include the full extent of the green link and shared surface route within zone D. A further s.96a application was submitted under ref: P/3004/18 which sought to correct the factual inaccuracies associated with the approved parameters plans in relating to development plots B1 and C1, and to enable changes to the approved parameter plans specifically relating to the zonal boundaries, limits of deviations and building heights. This was approved in August 2018.

### Plots B1 and C1

6.2.3 In December 2018, Reserved Matters were granted in relation to Plots B1 and C1 (subject of the current application) under planning reference: P/3892/18 which was approved on 06 December 2018. That application was put forward under the context of the outline planning application and sought to deliver 350 new homes over two development plots, as well as community and leisure uses within Plot C1. This application seeks only to amend the scheme which has already been approved. The table below sets out a comparison of the approved and current schemes.

	<b>Approved (P/3892/18)</b>	<b>Current Scheme (P/4581/20)</b>	<b>Difference from approved</b>
<b>Plot B1 (Blocks A1 and A2)</b>			
<b>Total No. units</b>	60	74	+14
<b>Affordable (%)</b>	100% (LAR)	100% (LAR)	-
<b>Block A1 + A2 Height / units</b>	A1: 8 storeys 34 units A2: 5 storeys 26 units	A1: 9 storeys 42 units A2: 6 storeys 32 units	+ 1 storey + 8 units + 1 storey + 6 units
<b>Plot C1 (Blocks G and H)</b>			
<b>Total no. units</b>	290	400	+110
<b>Affordable (%)</b>	27.6% (18 LAR units) 62 (SO units)	26.5% (35 LAR units) 71 (SO units)	- 1.1% (proportion of LAR units +)
<b>Blocks G-4 + H1-H5 Height / Units  (previously blocks C1- C10)</b>	C1 - 6 storeys 39 units C2 - 6 storeys 20 units C3 - 4-5 storeys 32 units C4 - 6 storeys 29 units C5 - 10 storeys 53 units C6 - 4-5 storeys 23 units C7 - 5 storeys 16 units C8 - 5 storeys 12 units C9 - 6 storeys 21 units C10 - 6 storeys 39 units	G1 - 7 storeys 46 units G2 - 7 storeys 35 units G3 - 5 storeys 35 units G4 - 6 storeys 39 units H1 - 14 storeys 69 units H2 - 5-9 storeys 50 units H3 - 7 storeys 35 units H4 - 7-10 storeys 48 units H5 - 6 storeys 43 units -	+ 1 storey + 7 units + 1 storey + 15 units + 1 storey (part) + 4 units - + 10 units + 4 storeys +16 units + 1-4 storeys + 27 units + 2 storeys +19 units + 2-5 storeys + 36 units - +22 units -

<b>Community Use (GIA)</b>	636 sqm	648.6 sqm	+ 12.6 sqm
<b>Retail (GIA)</b>	-	455.8 sqm	+ 455.8 sqm
<b>Leisure (GIA)</b>	768 sqm	-	- 768 sqm

\*Leisure space to be swapped back into the non-residential space in the recently permitted D1-D6 planning permission (P/3944/19).

- 6.2.4 The subject site is located within the “Heart of Harrow” which encompasses the two town centres of Harrow and Wealdstone, the Station Road corridor linking the two centres, and the industrial land and open spaces surrounding Wealdstone, including the Kodak site, Headstone Manor and the Harrow Leisure Centre.
- 6.2.5 The Heart of Harrow was designated as an Opportunity Area in the 2016 version of the London Plan and the outline permission granted under P/2165/15 was approved on the basis of this designation. The Opportunity Area designation is expected to contribute to the delivery of 3,000 jobs and a minimum of 2,800 new homes within the Area, through higher density residential and mixed use development on key strategic.
- 6.2.6 In addition to being an Opportunity Area, the entire Heart of Harrow is also designated as a Housing Zone, which seeks to help unlock the potential to deliver more than 5,000 new homes over the plan period. Housing Zones are designed to work flexibly depending on the local circumstances, however all new developments would need to be built to high quality standards and in compliance with all relevant policies contained within the development plan. In particular, proposals will need to demonstrate how new homes will come forward in a master planned approach, delivering strong communities through urban design and achieving a coherent neighbourhood.
- 6.2.7 The Kodak factory site is identified as a development opportunity site in the AAP and falls within the Wealdstone West sub area Site 2. The site allocates a minimum output of 1,230 jobs and 985 new homes to be achieved through a comprehensive mixed use led redevelopment of the site.
- 6.2.8 The approved masterplan divides the site into four different development zones (phases), which are further split into development plots. Whilst the masterplan was granted outline permission with all matters reserved, there are certain parameters that are fixed under this outline permission, which includes the amount of open space to be provided, the heights of the buildings, access point and primarily route through the site. The parameter plans also fixes the floor spaces for different uses to be provided within each development phase and the number of residential units. The applicant has already secured reserved matters approval for development plot D7 and planning permission to deliver a new energy centre (and associated community floor space) on plot D8.

- 6.2.9 This application relates to the development plots B1 (northern section only) and C1 (Development Zones B and C) of the Harrow View East masterplan approved under application P/2165/15. As noted under the planning history section, the outline permission grants permission to deliver up to 1,800 new homes on this site, new employment floor space of up to 32,360sqm, a new 3 form entry primary school, up to 10,230sqm of senior living/ assisted care accommodation, a food store (up to 2,000sqm), flexible commercial floor space (up to 2,000sqm), commercial leisure, community floor space, health centre, energy centre, associated new streets, highway improvements, multi-storey car park, open space and associated landscaping.
- 6.2.10 The proposed development would deliver approximately 455.8 sqm (GIA) of retail space (use class E) and 648.6 sqm of community space. There is a slight increase in community use floor space since the previous reserved matters application, however the 2015 outline planning permission identified an allowance of 8,720 sqm of employment space within Zone B and 13,400 sqm of employment use within Zone C and a maximum allowance of 1,570 sqm of community centre within Zone C. This will not be breached as a result of the current application.
- 6.2.11 The previously approved leisure floorspace under the current proposals would be replaced with a retail convenience store to be located on the ground floor of Plot C1 Block G2 to provide an active frontage facing the Harrow View highway. This is considered appropriate given that the three community uses would also be located on the ground floors of Blocks G1, G4 and H11 facing onto the Green Link to also provide active frontages on the surrounding street. The previously approved leisure space would be relocated to Block D5 approved as part of planning permission P/3944/19. This permission had allowed for flexible active uses (including use classes A1, A2, B1(a) and D1). Although a leisure use previously fell under Class D2 (outside of the flexible uses approved), the updated use class orders (September 2020) groups D1 and D2 uses under Class E. As such, the principle of locating the leisure use at the aforementioned site is considered acceptable and would achieve mix of uses encouraged to promote balanced communities at this site.
- 6.2.12 To ensure certainty that mixed and balanced communities are achieved through the relocation of the leisure facility, a section 106 obligation will be secured to ensure that the displaced leisure use will only be provided in Block D5 under the flexible use floorspace previously approved, upon implementation of the current application.
- 6.2.13 The current application seeks only to amend what has already been permitted under reserved matters application P/3892/18 and therefore the principle of the development has already been established. Since the grant of that permission both the National Planning Policy Framework (2019) and The London Plan (2021) have been updated. All the relevant updated policies have been addressed in the subsequent sections of this report.

6.2.14 Whilst it is acknowledged that concerns have been raised with regards to the increased heights of the buildings and the subsequent increase in density, such an increase would be supported in strategic terms by optimising site potential and density through high quality design. Furthermore, the increase in density on this site is appropriate at this location given the Housing Zone designation and the site being located within Harrow and Wealdstone Opportunity Area. Officers acknowledged that there is only an infinite supply of land available to deliver high density schemes in order to meet housing targets and given that the targets have increased further through the adoption of the new London Plan, the LPA is required to consider where suitable to maximum development potential on brownfield land, in particular on key strategic sites. With the former Kodak Factory site being the largest designated strategic site within the AAP and given its sustainable location close to local transport infrastructure and proximity to Wealdstone District Centre, further optimisation of the site would be considered appropriate and welcomed.

#### **Provision of Out-of-Centre Retail Use**

6.2.15 The proposal would include 456sqm (GIA) of retail floorspace. Paragraph 86 of the NPPF requires LPA's to apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Paragraph 89 goes on to state that when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, LPA's should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (in the case if there is no locally set threshold, the default threshold is 2,500sqm). This is consistent with policies E9 of the London Plan, DM35 of the DMP, AAP17 of the AAP and SD7 of the Draft London Plan. Harrow's threshold is set under policy DM35 of the DMP at 2,500sqm.

6.2.16 The original outline permission granted under P/3405/11 has already accepted the principle of retail and commercial uses for up to a floor area of 5,000sqm and this quantum is set out under the site description to Site 2 allocation within the AAP. The subsequent outline planning permission granted under P/2165/15, in light of the changes to national, regional and local development plan policies was required to be supported with a full retail sequential test and impact assessment report that assessed the impact of the retail provision on the existing Wealdstone District Centre and the local neighbourhood parade located on Headstone Drive. The impact assessment on the Wealdstone District Centre and the local neighbourhood parade was found to be acceptable under P/2165/15, which included the quantum of up to 2,000sqm for food store (Use Class A1) and up to 2,000sqm of flexible active uses which included B1a and D1 Use Classes.

6.2.17 The total quantum of 4560sqm of commercial floor space proposed under this application falls below the threshold required for an impact assessment. Furthermore, since the grant of outline planning permission under P/2165/15, the detailed reserved matters submitted under P/4610/17 for Development Zone A, secured a much lower quantum of flexible active

uses at a total floor area of 738sqm (Use Classes B1a, A1-A5 and D1) and a food store with a floor area of 522sqm.

- 6.2.18 Having regard to the fact that the site allocation supports the associated non-residential land uses and the relatively small scale floor area proposed on the application site, and that already secured on the wider masterplan site, it is considered that proposals would not have a detrimental impact upon the functioning and vitality of the nearby Wealdstone District Centre and the local neighbourhood parade. The retail unit would be located at key strategic routes within the masterplan site and would not result in a concentration of retail uses that would individually, or in conjunction with the proposed food store located within Zone A amount to any unacceptable impact on Wealdstone District Centre and the local neighbourhood parade. Furthermore, Officers consider that given the quantum of population that would reside on this masterplan site once complete, the proposed flexible uses would serve as a place marking function alongside providing local employment opportunities and therefore can be supported in principle.

### **Community Use**

- 6.2.19 The proposal includes the provision of 648sqm flexible community floor space within plot C1. The AAP envisages the provision of community facilities on the application site to support the new sustainable community to be created and the scheme responds to that aspiration, so these uses are supported in principle. It is not clear at this stage how these community facilities will be operated or maintained. However, it is considered necessary to secure a s.106 heads of terms to secure this community floorspace to be transferred to the Council to enable them to nominate the facilities to appropriate community uses at nil cost to the Council.

### **Conclusion**

- 6.2.20 In view of the above and as demonstrated further in this report, it is considered that the proposal would meet aspirations of the policies listed above and therefore the proposed development is acceptable in principle.

## **6.3 Environmental Impact Assessment (EIA)**

- 6.3.1 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.

- 6.3.2 The applicant requested an EIA Screening Opinion from the LPA (planning reference: P/3333/20) in accordance with Regulations 5 and 6 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).

- 6.3.3 The LPA concluded that the development was considered not to be a development that required 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.

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

6.4.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2021): D1, D3, D4, D8, D9, D12, HC3, HC4
- Harrow Core Strategy (2012): CS1B, CS1E
- Harrow and Wealdstone Area Action Plan (2013): AAP1, AAP4, AAP6
- Harrow Development Management Policies (2013): DM1, DM2, DM3, DM7
- Residential Design Guide Supplementary Planning Document (2010)

### Context and Layout

6.4.2 The NPPF identifies that good design is a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making place better for people (paragraph 56). The NPPF states that planning decisions should aim to ensure that developments will function well and add to the overall quality of the area, establish a strong sense of place, respond to local character, create safe and accessible environments, and ensure good architecture (paragraph 58).

6.4.3 The New London Plan Policy D3 (Optimising site capacity through the design led approach) requires development proposals to be consistent with the following approach:

- Enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape;
- Encourage and facilitate active travel;
- Clearly define public and private environments;
- Facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries;
- Achieve safe, secure and inclusive environments;
- Provide active frontages;
- Deliver appropriate outlook, privacy and amenity;
- Provide conveniently located green spaces for play, relaxation and physical activity;

- Help prevent or mitigate the impacts of noise and poor air quality;
- Achieve indoor and outdoor environments that are comfortable and inviting;
- Respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect;
- Be of high-quality design and utilising of attractive, robust materials which weather and mature well;
- Aim for high sustainability standards; and
- Provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places.

6.4.4 New London Plan D4 (Delivering Good Design) highlights that visual modelling and assessments should be undertaken where appropriate and that proposals where the proposed density exceeds 350 units/ha, such developments should be subject to a DRP.

6.4.5 The Core strategy defines tall buildings to 30m+ and this scheme is within this threshold so therefore the application and consideration of policy D9 in the London Plan (2021) is not relevant here. Notwithstanding this, officers have considered the application against the spirit of the policy and there is no conflict with the aims of policy D9.

6.4.6 At a local level, the Development Management Policies DPD, Policy DM1 (Achieving a High Standard of Development), requires all new developments to achieve a high standard of design and layout, having regard to the appearance of proposed buildings, including but not limited to architectural inspiration, detailing, roof form, materials and colour, entrances, windows and the context provided by neighbouring buildings, the local character and pattern of development.

6.4.7 Harrow and Wealdstone AAP, Policy AAP4 (Achieving a High Standard of Development Throughout the Heart of Harrow), requires all developments within the Heart of Harrow to use high-quality, durable and serviceable materials to the external finishes of buildings.

#### Design, Scale and Materiality

6.4.8 Detailed proposals have now been developed for most plots within Harrow View East as a combination of reserved matters and full planning applications. Following the new and emerging site context, the scheme architects, PTE, have reviewed the existing approved reserved matters scheme against this emerging context which has ultimately identified opportunities for additional massing to better complement this context, improve the legibility of the new neighbourhood and provide more homes. The proposals have been developed through DRP engagement. The Council's appointed Urban Design Officer is in support of the scheme as are the GLA in their Stage 1 response.

- 6.4.9 The approved reserved matters scheme comprises building heights ranging from a minimum of five storeys to a maximum of ten storeys. The approved reserved matters proposals for Plot B1 comprised two buildings of eight and five storeys. The eight-storey building is very similar to the general datum height of buildings around the green link and it is considered that in its approved form, would be dominated by the 14-storey building proposed on the adjacent Plot A3. An increase of just one storey to a total of nine-storeys in height is proposed for Block A1 to better distinguish this building from the general datum height around the green link and reinforce this as a prominent building, assisting the legibility of the masterplan. The top floor of the building will be reduced in size and articulated with recessed roof terraces, contributing to the visual prominence of the building and creating dynamic massing which is viewed differently when approached from different directions of the site. The reserved matters scheme for Plot B1 also proposes a five-storey building known as Block A2 which fronts onto the park to the north. Other buildings along the park frontage range in height between 6-8 storeys. The new proposals for Plot B1 seek to increase the height of the building from five to six storeys, aligning the datum height of the remaining frontage around the Green Link. The building has been designed to provide a setting for the more articulated forms of Block A1.
- 6.4.10 The tallest ten-storey element approved as part of the reserved matters scheme was proposed within Plot C1 and was designed to create a cluster of 10 storey buildings terminating key views down the green link. In November 2020, LB Harrow approved a full planning application for Harrow View LLP's third phase of development at Harrow View East for Plots D1-D2 and D4-D6. These proposals introduced an 18-storey building as part of this cluster, located in a prominent position at the head of the park.
- 6.4.11 The revised proposals seek to increase the height of the tallest element by four storeys, to create a 14-storey block to reflect its location in the second most prominent position, terminating views from the south of the green link. The height of 14-storeys in this location will sit between 10 and 18-storey heights either side, reinforcing the hierarchy and variety in heights introduced by the Phase 3 (D1-D6) scheme.
- 6.4.12 A modest increase in height is also proposed across the rest of Plot C1, with heights carefully distributed to reinforce placemaking and legibility. A datum height of 6 storeys is proposed for the building facing on to the Green Link, reflecting the scale of the approved buildings opposite. Building heights along the Avenue are designed to create variety in the roofscape. A 7-storey datum height is proposed to complement the 7-8 storey datum height approved as part of the Phase 3 section of the Avenue. Distinguishably taller buildings are proposed at the corner of the Lane (9 storeys) and Green Link (10 storeys) to highlight the routes. The Lane is envisaged as a more intimate space and is flanked by the lowest element, at 5-storeys. A 6-storey scheme with a setback 7th floor is proposed along Harrow View.

- 6.4.13 In terms of townscape, the Heritage, Townscape and Visual Impact Assessment (HTVIA) considers that the development will benefit the townscape of the local area by introducing new high-quality architecture, public realm and improved permeability through the site. The assessment of the visual receptors has not identified any adverse effects arising from the proposed development and in fact the HTVIA concludes that the proposals will introduce new buildings of high architectural quality into the experience of people using the area. Indeed, there will be an improvement to the general visual character of the area and to the plots.

Impact on Heritage Assets

- 6.4.14 The applicant has submitted a Heritage, Townscape and Visual Impact Assessment (HTVIA).
- 6.4.15 The subject site is not located within a Conservation Area and does not contain any statutory listed buildings. There is a locally listed underground Air Ministry Citadel, known as Station Z located immediately to the north of the subject site, which consists of a basement and sub-basement that can be accessed via a prefabricated metal entrance hut. The basement level is roofed over by three and a half feet of reinforced concrete. The above ground structures were demolished in 1996.
- 6.4.16 Approximately 600m north-west of the subject site is the grounds of Headstone Manor which comprises the statutorily listed Headstone Manor (Grade I), Great Barn (Grade II), Small Barn (Grade II), the Granary (Grade II) and the Scheduled Monument moat of Headstone Manor.
- 6.4.17 The site is not located within any Strategic views as determined by the adopted London View Management Framework (2012).
- 6.4.18 The site lies partially within the setting of protected viewing corridor (yellow cone) of Old Redding. Most notably Harrow on the Hill and St Mary's Church are key views from this open space. The Kodak factory is also visible from this view. The chimney of the former powerhouse situated within Development Zone D of the wider Harrow View East masterplan site has a height of approx. 64.6 metres, as such, the presence of the former factory can be viewed at a number of local vantage points and from a number of distant points from higher ground.
- 6.4.19 The site falls within the wider yellow cone, however it is considered that the development would not compromise views of Harrow on the Hill or St Mary's Church as the site is set much lower than these features and as such there would be no impact upon protected views.
- 6.4.20 In terms of the impact upon heritage assets, the impact upon the listed buildings located on Headstone Manor grounds will not be significant, given its distance and orientation from the subject site. The HTVIA shows that there might be some glimpsed views of the proposed development from the north-east corner gardens, but the Manor House itself is not discernible

within its tightly defined setting within the trees. As such, there would be no impact upon the setting of these listed buildings. In terms of the locally listed underground Air Ministry Citadel, given that its structure and interest and value is contained below ground, it is considered that there would be no impact on this structure. The HTVIA also gives consideration on the impact and views from other heritage assets within a 1km radius of the development site and it has been demonstrated through this assessment that there would be no impact upon the setting of these other statutory and locally listed buildings.

6.4.21 In terms of townscape and views, the HTVIA demonstrates that there would be inter-visibility of the proposed development from surrounding areas at certain vantage point at street level along Harrow View, Headstone Drive, Pinner Park Gardens and Cecil Road. In terms of the distant views, from Pinner Park Farm, Headstone Manor Recreation Ground, Pinner New Cemetery, Headstone Lane Station Bridge and Harrow and Wealdstone Station Bridge, the proposed development will be perceptible in the backdrop views from these locations but this will be at a considerable distance and therefore the impact would be low. Furthermore the high quality architecture that would replace the former factory buildings would be of some benefit to the townscape and views.

6.4.22 Whilst noting that there will be a change within the townscape views, the changes to the landscape panorama associated with the form of development would not erode the fundamental qualities of these views. The scale and development typologies would instead reflect the sites strategic location, within the Heart of Harrow AAP area. Based on the above, the proposal would not give rise to any conflict with the policies listed above.

#### Impact on Protected Views

6.4.23 A Heritage, Townscape and Visual Impact Assessment has been submitted in support of the planning application. In terms of visual impact generally, the main change will be the visibility of new residential buildings from the immediate residential neighbourhoods. Due to the high quality of the buildings proposed, no adverse visual effects have been identified and it is considered that there will be an improvement to the general visual character of the area and to the plots. In respect of Policy DM3, all of the site falls within the wider yellow cone, however it is considered that the development would not compromise views of Harrow on the Hill or St Mary's Church as the site is set much lower in the landscape than these features and the high-quality design also ensures that there would be no detrimental impact to the viewing corridor.

#### Landscaping/ Urban Greening

6.4.24 The public realm chapter of the Design and Access Statement explains that looking at the proposed development in isolation generates an Urban Greening Factor of 0.32. This is largely due to the significant road and street

network associated with the proposed development which also benefits the wider masterplan area.

- 6.4.25 The wider masterplan area includes an extensive area of 'Green Link' which is to benefit all areas of the masterplan. When the proportion of the Green Link associated with the proposed development is factored into the calculation, the Urban Greening Factor for the proposed development increases to 0.35.
- 6.4.26 The Proposed Development aims to maximise the area of green roofs in the scheme to improve with surface water management and enhance biodiversity. Section 6 of the Design and Access Statement sets out the site wide landscaping strategy for the different streets, public spaces and podiums. Details in respect of trees, planting and street furniture are provided for all landscaped areas depending on their character. The aim is to continue the theme of the wider masterplan area; which is heavily landscaped to reflect its setting within the 'Green Link'. Whilst the overall Urban Greening Factor falls slightly short of suggested targets set out in the Intend to Publish London Plan targets, it is considered that every effort has been made to maximise urban greening and that the total score is reflective of a strong response to this policy in the context of the wider Harrow View East site.
- 6.4.27 The strategy for the project as a whole depends on the network of streets and green spaces extending the spaces of the green route. One key aspect of the strategy is that clumps of the same trees specified in the green are, where possible, located within this site; giving viewers from the park the impression that the park extends right through the site. Elsewhere street trees give colour and structure to specific sides of each street. Special tree planting within the playable spaces. Low planting is made at and around parking areas and other street side spaces, to break up the perceived extent and presence of the carriageway kerbing. The strategy also incorporates measures to contribute to habitat creation to increase biodiversity: Providing native planting and wildlife attracting species, planting of climbing species where possible, as well as using a flowering lawn mix and native bulb planting along the areas of low planting to provide biodiversity and amenity interest to the site.
- 6.4.28 In addition to a planting palette which focuses on native planting rather than ornamental species, bat and bird boxes will be accommodated into built elements where possible and biodiversity features in the wider landscaping will provide habitat opportunities for birds and insects. Planting at ground level as opposed to raised planters on the ground floor landscape and public realm will also support long term establishment of trees, hedges and shrub planting which will provide long term habitats for wildlife which are part of a bigger network of these types of planting within the masterplan. Overall a strong network of potential wildlife habitat is created throughout the site.

- 6.4.29 Tree planting is provided in ways that expand the wider strategy and provision for greening; this site becomes an extension of the Green Link as a landscape setting for the buildings. The space to the north which directly connects to the Green Link is brought together with a continued tree palette. The suggested tree species achieve the desired engagement with the wider site.
- 6.4.30 ‘Green Link’ Trees are proposed to match the species to create a sense of the site being immersed in the park. Clumps of trees, located at the end of visible sight lines from or along the Green Link, provide a spatial continuity of this space. These are predominantly clumps of birch or pines, with opportunity for two larger woodland trees where there is sufficient space for large trees to thrive. A row of linear trees to the southern boundary of the site provide a screen and strong emphasis of the boundary between residential and adjacent neighbouring sites. Feature trees are to emphasise special moments within the continuation of the Green Link space. The communal amenity spaces which accommodate play and seating feature some ‘special trees’ which are intentionally playful with fruit / nuts which become part of the playful landscape.
- 6.4.31 Primary Road (The Avenue) which will be adopted by the Council, is a street which accommodates vehicular and service access, and which helps to define much of the broader urban structure of the development as a whole and create strong threshold between the residential and industrial uses beyond. To strengthen the role of this space, the design:
- Seeks to capitalise on the non-symmetrical uses along this route with opportunities for green pockets, rain gardens, tree planting and orientation.
  - Reveals the street from the green route with large clumps of trees marking deep views, and strengthening legibility and a perception of the development as a green environment
  - Uses careful location of street parking in such a way as to resist the parking areas becoming too dominant visually and physically. This is achieved by selective tree planting and breaking the stretches of parking areas up as much as possible, to sustain permeability, and convenient areas to be able to cross the road.
  - Footway widths and front gardens are optimised by maintaining minimum widths for each, and wherever possible, maximising these to strengthen a feeling of spatial variety, and difference between one part of the development and another.
- 6.4.32 This edge of the public realm and landscape forms part of the Harrow View road edge and provides a forecourt space for layby and retail uses, as well as providing part of the pedestrian and public realm network for the development as a whole. It contributes to the visible frontage of the project as a whole, and in this role, the design seeks to provide a positive image to the street; carefully designed to accommodate practical needs, but also arranged to look like a carefully designed space. The space has to work hard to accommodate existing trees, support access to retail uses, allow for layby parking, pedestrian crossing, bus stops, cycle parking and at the

same provide a positive public environment next to the busy road environment. A few key measures to achieve this include:

- Maximising the width of the footway.
- Designing the space to feel integral with the rest of the Harrow View frontage but in particular to engage with the western section of the Green Link, where it comes up to meet Harrow View.
- Supporting the strategy of the landscape feeling bigger than the spaces between buildings; using a range of scales of landscape elements with consistent material extents.
- Retaining trees to create screening and designing the space to allow trees, tree pits and other spaces to be experienced in proximity, with pleasure
- Making the tree pit surrounds spatially generous and positive in image and in their rectangular and raised arrangement echoing the distribution of entrance mats set within a landscape, which also informs the design of the Lane.
- Wide footways, crossings, bus stops, supermarket, green link

6.4.33 This stretch of public realm and landscape extends the Green Link north between the two building blocks, and links through visually and physically to the northern east-west stretch of the Avenue. The space provides a positive pedestrian experience by accommodating a green and playful public space, ground floor gardens and defensible spaces, access to some residential entrances, as well as accommodating service and refuse access at managed times. The space forms part of the life of the wider Green Link and associated communities, and it engages with the biodiverse and play based amenities that characterise the network of the wider development.

6.4.34 In addition to this general network, The Lane is also designed to provide spatial and physical qualities that enhance local distinctiveness. There is a linear pattern to the arrangement of spaces as a whole, which helps to make the space feel connected and inviting. Standard materials such as concrete pin kerbs are used as paving to achieve a woven texture to this part of the ground. But there is also a series of hard landscaped mats and some variety of boundary treatments that resists a corridor-like effect and instead opens up the perception of the space from building to building. In fact, as with the rest of the strategy, because the patterning stretches around the southern frontage of the buildings, there is a sense of the landscape running underneath and beyond the buildings.

6.4.35 The Lane is designed to accommodate everyday pedestrian, playful and servicing uses. Patterned 'mats' serve entrances and mark moments of social interaction. Gardens are made private with deep planting thresholds. Playful spaces are woven throughout the length of the space; though focussed towards the southern end, where the Green Link opens up. The image of the road is suppressed within the landscape, to maintain the feeling of a shared social space. At the southern end, the materials of the hard landscape are intended to run inside the community spaces, strengthening the feeling of the shared landscape as a social infrastructure.

- 6.4.36 Overall, the landscaping strategy proposed would integrate with the wider masterplan site and would provide a high quality finish. The detailed landscaping strategy and detailed planting together with the maintenance and management plan will be secured by condition.

#### Refuse and Servicing

- 6.4.37 A strategy for refuse collection has been developed in dialogue with the Harrow Council's Waste & Recycling Services team and is based on their guidance document 'Code of Practice for the Storage and Collection of Refuse and Materials for Recycling in Domestic Properties' (2016). A refuse store for each building is provided and has been located with 10m of the vehicle collection point. Communal entrances to each building are provided in close proximity to the street to allow direct access for drop off and deliveries from the street.

- 6.4.38 A strategy for refuse collection has been developed using Harrow Council's guidance document 'Code of Practice for the Storage and Collection of Refuse and Materials for Recycling in Domestic Properties' (2016). Refuse stores for each core are provided within the curtilage of the buildings and has been located within 10m of the vehicle collection point. Access to the Building G2 bin store will be from the loading bay. This bay will be time managed to ensure no conflicts with convenience store delivery vehicles or retail customer parking. Buildings with bin stores located on The Lane (G3, G4, H2, H1) will be serviced via the protected service route connected to Plot D7. Buildings H5 and H1 will be serviced via an access route in the adjacent Plots (D5 and D6) connecting The Avenue North with the Park. As the Block G1 bin store is inaccessible for refuse vehicles via Harrow View, Building G will incorporate a managed strategy for bin collection day. This strategy requires that the bins from the Block G1 communal bin store be moved to the temporary holding area in Block G2 for collection from the Block G2 Bin Store facing The Avenue. Separate refuse stores have been provided for retail and community uses within 10m of collection points. A total of 108 bins are provided for the 9 blocks, which accords with standards.

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

- 6.4.40 The Strategy States the following:

#### Zone 1 - Primary Roads and Shared Surfaces:

The lighting strategy for the Primary Road and shared surfaces will be same and sufficient lighting for safety by incorporating strategically placed lighting columns at a height of 4-8m. The lighting on the road will be positioned to provide comfort to prevent repeated pattern of high and low luminance

values on a lit run of road becoming too evident and ensure lighting are placed to provide uniform and evenly distribute lighting illumination. Given the close proximity of commercial units in Plot C1, the luminaires will be configured to minimise light pollution into the dwellings and to maximise the light distribution and aesthetics. To minimise misdirected or obstructive light the lighting columns have been selected such that the beam angle will be less than 90° as recommended by the ILP. The colour temperature will be limited to 4000K to minimise potential detrimental impacts on local biodiversity. The Adoptable Street Lighting will comply with the Council's Standards for Adoptable Roads.

**Zone 2 – Secondary / Residential Streets and Cycle Links** The lighting strategy for the residential streets and cycle links is to provide sufficient lighting for safety, however, ensuring an attractive night time environment to allow users to navigate the main routes safely. External lighting will be provided via wall facade mounted luminaires, to minimise columns along the main pedestrian areas, to focus on the safe navigation across the main footpaths, however, not to over light the Green Link in order to encourage biodiversity. All luminaires will also be LED to ensure that UV light is minimised and the lamps colour temperature will not exceed 4000K which will further assist in encouraging biodiversity. Localised furniture across the pedestrian routes could accommodate low level LED feature lighting to define seating areas throughout. It is not expected that these lights will produce a significant impact on the overall lighting levels.

**Zone 3 – Courtyards** The lighting strategy within podium courtyards will accommodate low level bollard luminaires and possible low level bench lighting to appropriately illuminate pedestrian walkways and to minimise light pollution and the impact to the surrounding residential dwellings.

**Zone 4 – Public Open Spaces.** The lighting strategy for the public open spaces is to create an area of safety and wellbeing as well as an attractive night-time environment. The lighting strategy for the public open spaces is to strategically locate column/pole lights around the perimeter of the spaces, matching the existing surrounding pedestrian areas and lighting provision under earlier phases of the development. Given the close proximity of ground floor residential units in Plot B1, luminaires will be selected to minimise light pollution into the dwellings and to maximise the light distribution and aesthetics, whilst considering Secure by Design requirements. Refer to Appendix 01 for proposed luminaire types.

- 6.4.41 External Building Lighting All main entrances to the building will be illuminated by soffit mounted downlighters / wall mounted luminaires to comply with the relevant British Standards.

## Summary

- 6.4.42 The National Planning Policy Framework reiterates the Government's commitment to good design. However, the NPPF is also clear that local planning authorities should not attempt to impose architectural styles or particular tastes and emphasises that good design goes beyond the consideration of visual appearance and architecture.
- 6.4.43 It is considered that the proposal would introduce high quality architecture, materials and public realm to the site. The proposal has undergone robust design scrutiny and various experts in the design field, have concluded that the scale and height would not cause detriment to the urban context of the area.
- 6.4.44 As with any planning proposal, the consequential impacts in relation to character and appearance must be weighed in balance against all other relevant material planning considerations, as set out within the report. Overall, officers consider that the proposal has been well considered and would result in a high-quality development that would comply with the relevant policies. Any actual or perceived local adverse impacts on townscape would not outweigh the overall benefits of the proposal.
- 6.4.45 Since the Council's Area Action Plan was adopted in 2013 and outline planning permission was granted in 2015, the masterplan for the site has been evolved considerably based on rigorous design analysis and introducing additional height at the proposed points within the site is considered to be justified. Furthermore, the introduction of the Opportunity Area and Housing Zone designations by the GLA in this area mean that additional height is required to meet these strategic objectives. The proposed development is therefore in line with policies listed above.

## **6.5 Fire Strategy**

- 6.5.1 The application was accompanied by a Fire Strategy in accordance with policy D12 of The London Plan (2021). The GLA raised no objection to the submitted Fire Strategy but requested it to be appropriately secured through planning conditions. The Council's Building Control Officer has reviewed the fire strategy and has made comments and requested further information to be provided. The applicant shall be providing further details to this effect, including a more detailed fire strategy for Plot B1 which has commenced development under the extant reserved matters approval. Notwithstanding this, a condition is recommended to ensure that a fully comprehensive fire strategy is provided prior to the progression of damp proof course level for each building.

## 6.6 Impact to Residential Amenity

6.6.1 The relevant policies are:

- The London Plan (2021): D1, D3, D6, D14, S4
- Harrow Core Strategy (2012): CS1
- Harrow Development Management Policies Local Plan (2013): DM1, DM28

### Outlook / Visual Amenities

6.6.2 There are no specific policies within the AAP which deal with safeguarding residential amenity but it states that development proposals would be required to meet policy DM1 of the Development Management Policies Local Plan (2013), which seeks to ensure that “proposals that would be detrimental to the privacy and amenity of neighbouring occupiers, or that would fail to achieve satisfactory privacy and amenity for future occupiers of the development, will be resisted”. Policies DM27 relating to amenity space and DM28 children and young people’s play facilities are also applicable

6.6.3 Policy D6 of The London Plan requires all new residential development to provide, amongst other things, accommodation which is adequate to meet people’s needs. In this regard, minimum gross internal areas (GIA) are required for different types of accommodation, and new residential accommodation should have a layout that provides a functional space. Table 3.1 of The London Plan specifies minimum GIAs for residential units and advises that these minimum sizes should be exceeded where possible. The Mayors Housing SPG sets out detailed guidance on a range of matters relating to residential quality, incorporating the Secured by Design principles, and these form the basis for the assessment below. The use of these residential unit GIA’s as minima is also reiterated in Appendix 1 of the Residential Design Guide SPD. This is supported by policy AAP13 of the AAP.

### Internal Space Standards

6.6.4 The minimum space standards are set out at Table 3.1 of the London Plan (2021) and are reproduced within the Mayor’s Housing SPG. The proposals exceed the Nationally Described Space Standard and policies at national, regional and local levels. The homes proposed are a minimum of 38 sqm (with wheelchair adaptable units being 46sqm and 52sqm), provided with a shower room and boast wide, full-height windows, with window heads at 2.4m above floor level allowing daylight to penetrate through and to the back of the homes. The homes are based on a standard layout which ensures that they are of a consistent quality and enables them to be built at a price that ensures they are affordable to purchasers. The majority of new homes (54%) are dual aspect, including all larger homes, and there are no north facing single aspect homes. All homes are provided with a private outdoor amenity space as either a garden or balcony.

- 6.6.5 The scheme is designed to meet the standards set out in the 'GLA Housing Supplementary Planning Guidance (March 2016)'. All homes have been designed to meet or exceed the Nationally Described Space Standards. The scheme has also been designed to take into account the Governments National Design Guide (October 2019). In terms of accessibility, 90% of new homes have been designed to comply with Building Regulations Approved Document Part M 2015 Category 2 (Accessible and Adaptable Dwellings). 10% have been designed to comply with Category 3 (Wheelchair User Dwellings).

#### Overlooking and Privacy

- 6.6.6 In assessing the impact in terms of outlook and privacy, there would be some minimal level of overlooking of the communal garden and facing windows serving Goodstone Court at oblique angles from proposed building B1. Furthermore, sufficient distance would be retained between opposing elevations, which would be a good level of separation distance. In terms of Block J on the Harrow View West site, the intervening highway would provide more than adequate separation distance from that neighbouring building and the proposed buildings in Plot C1. To ensure the privacy between residents and pedestrians, a selection of hedge plants are proposed to provide a green screen.
- 6.6.7 The proposed buildings within both Plots would have satisfactory relationships with other buildings within the wider masterplan site, in terms of outlook, light and privacy.
- 6.6.8 In conclusion, the proposed development whilst would introduce a high density form of development within close proximity to existing building, it has been demonstrated that the proposal would not give rise to an unacceptable level of harm to any residential amenities of neighbouring site so as to warrant a refusal on such grounds. It is considered that the proposal would give rise to no conflict with the development plan policies stated above.

#### Play Space

- 6.6.9 The GLA required further detail to demonstrate where off-site play space is proposed in order to demonstrate that the proposal fully satisfies the needs of the development whilst continuing to meet the needs of existing residents (or in this case, to ensure there is no "double-counting" of playable spaces that have already been approved for other parts of the wider masterplan.
- 6.6.10 The applicant has clarified the matter. They state that to ensure there is no double counting of playable spaces that have already been approved by other parts of the wider masterplan, a review of the play provision of the other plots which allocate play spaces within the Green Link has been carried out to ensure there will be enough area provided to satisfy the requirements for all plots from this space.

- 6.6.11 The two other parts of the wider masterplan which allocate play within the green link are plots D1-D6 and D7. D7 includes the Green Link part of the masterplan within its planning application and proposes a considerable over provision of play as part of the masterplan approach, that The Green Link accommodates play and amenity space for the wider masterplan. The D7 application contained an overprovision of 979.5m<sup>2</sup> of play which enables the other plots to allocate play within the Green Link. D1 -D6 allocates 570m<sup>2</sup> of 12+ age play B1 allocates 121m<sup>2</sup> 12+ age play in the green link C1 allocates 260m<sup>2</sup> for the 12+ age play in the green link. There is a total of 951m<sup>2</sup> of play space proposed.
- 6.6.12 It is further considered that the proposed development has to be considered in the context of the wider masterplan forming part of the Harrow View East site, which will be delivering a generous green link and community square (public open space) of circa 23,520sqm across the entire Harrow View East masterplan site (based on the correct parameter plans approved under the non-material amendment application P/3004/18).
- 6.6.13 On the basis of the above, it is considered that the GLA comments have been addressed and the play space provision is adequate when viewed against the wider master plan site. Accordingly, compliance with policy S4 of the London Plan 2021 and policy DM28 of the Development Management Policies Document (2013) has been achieved.

#### Daylight/Sunlight

- 6.6.14 Daylight and Sunlight has been tested in two forms as part of this submission. The Daylight and Sunlight Report prepared by Waterslade analyses the potential daylight, sunlight and overshadowing effects of the proposed development on surrounding future development as well as the daylight, sunlight and overshadowing which will be experienced by future residents of the proposed development.
- 6.6.15 In assessing the impact of a new development on neighbouring properties it is usual to only consider main habitable spaces (i.e. living rooms, bedrooms and kitchens) within residential properties. The majority of neighbouring properties are either of commercial occupancy or are located a considerable distance away from the proposed scheme to be materially impacted by the proposed development, therefore only two surrounding properties have been assessed.
- 6.6.16 A detailed assessment was conducted of Goodstone Court, located to the south of the site, in relation to the proposed impact caused by the proposed scheme within Plot B1. The daylight and sunlight impact to this property is considered to be negligible. The closest building located within the redevelopment of the Harrow View West site to the west of Plot C1 which is under construction has also been assessed. A number of the site facing windows are underneath balconies which restricts their access to daylight and sunlight; in accordance with BRE guidance, VSC targets apply to unfettered plain facades and VSE figures under balconies should not be

used to judge the acceptability of proposed massing. Notwithstanding this, the VSC figures for the windows under balconies and VSC figures with its effect removed, in line with BRE guidance, have been provided in the table of results. Discounting the effect of the balconies, all but eight windows fully comply with the BRE guidelines. These eight windows will experience proportional reductions of up to 0.67 however they will retain very good VSC values of between 24%-26%. Furthermore, these rooms will continue to achieve their respective ADF targets and therefore, will receive good levels of daylight. Given that this property is not complete, there will be no occupants to experience a reduction or increase in daylight. Therefore, the ADF assessment is most appropriate in this situation. The property will retain very good sunlight levels, fully complying with BRE guidelines. Overall, the daylight and sunlight impact to this surrounding property will be small and the retained daylight levels will be very good for an urban location. Therefore, the impact to this property should be considered acceptable.

- 6.6.17 The results of the proposed development on neighbouring consented blocks within the Harrow View East site are considered to be acceptable for Plot D7 (Block F and Block B) Plot D5, Plot D6 and Plot A3. In terms of the effects on future residents themselves, the Daylight Sunlight Report provides the ADF results for all of the habitable rooms associated with the proposed development. Overall, there is an 85% compliance rate which is considered good in an urban development of this scale and is acceptable. The rooms that receive lower levels of daylight generally have access to direct skylight restricted by balconies.
- 6.6.18 The balconies are an asset to the flats they serve, and so the well-lit external amenity space they provide must be balanced against the reduced daylight to the rooms behind. This exceeds the 82% ADF pass rate achieved by the previous reserved matters submission. With regards to overshadowing, the overshadowing to the amenity area to the south of Plot C1 will be fully compliant with the BRE guidelines. In terms of the two courtyards within Plot C1, less than 50% of the area of each courtyard will be able to receive at least two hours of sunlight on March 21st.
- 6.6.19 However, one area (Block G) will only be marginally below guidance, with 47% of the area receiving at least 2 hours of direct sunlight the other (Block H) achieves 26%. This is not uncommon in winter months and this amenity space is more likely to be used in summer when it is good weather. These results also closely mirror the overshadowing figures in the approved B1/C1 reserved matters application. Calculations undertaken for April 21st and June 21st demonstrate that over 50% of the area of both courtyards will receive at least two hours of sunlight, particularly in June when over 70% of the area will receive this. Overall, this represents a good level of sunlight amenity in relation to a courtyard amenity space within a high density residential environment.
- 6.6.20 The uplift in units proposed as part of this full planning application seeks to make best use of development land. This necessitates an increase in

density which requires a flexible approach to daylight and sunlight. The National Planning Policy Framework 2018 (para 123.c) states that 'when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site.' It is therefore considered that the proposed development meets the BRE's targets as well as Policies D4, D3, D6 and D9 of the London Plan, and Policy DM1 of the Development Management Policies DPD.

### Noise and Disturbance

- 6.6.21 A baseline noise survey was undertaken on 9th-11th October 2017 to establish the baseline noise environmental around the site. An assessment has been carried out in relation to noise levels likely to be incident on the proposed building facades and to provide acoustic performance specifications such that acceptable internal noise criteria can be achieved.
- 6.6.22 Internal noise levels will be controlled by glazing and trickle ventilation configurations. Rw38 dB double glazing is required in the worst affected bedrooms overlooking Harrow View to protect the residences from any potential noise impact arising from road traffic however, other areas only require standard thermal double glazing. Given the size of the proposed balconies, these are not considered to be subject to the external noise limits discussed in BS8233 and the WHO guidelines. External amenity spaces proposed within the courtyards of the blocks would be expected to have noise levels in line with the recommended levels. As such, external noise levels at the site are considered to be acceptable.
- 6.6.23 The Vibration Assessment concludes that vibration and structure borne noise are not considered to be problematic for any residential block located more than 30m from the railway line. Plot C1 is one of the closest blocks to the railway line however it is still located approximately 75m away, with Plot B1 being situated even further away from the railway. Therefore, vibration and structure borne noise are not considered to be an issue.
- 6.6.24 The Proposed Development will not generate any likely significant effects, either during construction or operation, either on its own or cumulatively. Furthermore, noise during construction and noise associated with the Proposed Development is not expected to have any adverse effects on the existing or future neighbours to the site and therefore Policies D13 and D14 of the London Plan are satisfied.

### Summary

- 6.6.25 In conclusion, it is considered that the proposal would not result in impacts on residential amenity that would be significant enough to warrant a refusal.

## 6.7 Housing Output & Affordable Housing

6.7.1 The relevant policies are:

- The London Plan (2021): GG2, H1, H4, H5, H6, H10
- Harrow Core Strategy (2012): CS1I, CS1J, CS81
- Harrow Development Management Policies Local Plan (2013): DM24
- Harrow and Wealdstone Area Action Plan: AAP13
- Mayor of London Affordable Housing and Viability Supplementary Planning Guidance (2017)
- Mayor of London Housing Supplementary Planning Guidance (2016)

### Affordable Housing, Mix, Tenure

6.7.2 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).

6.7.3 The proposed development triggers an affordable housing requirement as it constitutes a major residential development. Policy H4 of The London Plan (2021) 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.

6.7.4 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 make 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.

6.7.5 The London Plan (2021), 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 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).

- 6.7.6 The application seeks permission for 474 residential dwellings (or 1,287 habitable rooms). The applicant proposes 180 affordable units (515 habitable rooms) which equates to 40% of total units by habitable rooms (38% by unit). Of these, 37.7% would be intermediate rent and 62.3% would be London Affordable Rent (LAR). The applicant has provided a schedule of the type, mix, tenure and floor areas of units to be proposed across the site, which includes 1 bed (2 person), 2 bed (3 and 4 person) and 3 bed (4 and 5 person) and would include a mix of flats and duplexes. The applicant has provided the GIA for each unit type which has been considered to be acceptable in terms of the national space standards. The homes for affordable rent would be provided within buildings Plot B1 (Blocks A1 and A2) and Block H3 in Plot C1. The shared ownership units would be located within buildings G3, H3 and H4 within Plot C1.
- 6.7.7 Plot B1 would comprise 74 affordable rent units and include a mix of 25 x 1B2P; 40 x 2B4P and 9 x 3B5P units. Plot C1 would comprise 71 shared ownership units with a unit mix of 27 x 1B2P; 37 x 2B3P; 6 x 3B4P and 1 x 3B5P units and 36 affordable rent units comprising a mix of 16 x 1B2P; 11 x 2B4P; 7 x 3B5P and 1 x 4B6P units.
- 6.7.8 The Council's Housing Officer has reviewed the proposals and strongly supports the proposed provision and tenure. Whilst it is noted that there is an overprovision of 1B2P (37%) units against the target mix of 10%, the provision of 47 x 2B4P and 3B+ units (16%) weighs in favour of the scheme. Furthermore, the provision of 13 wheelchair accessible units out of 109 affordable rented units, equating to 11.9% which is in excess of the 10% target and half of them being 2B4P units (the others being 1B2P) would meet wheelchair housing priority need for 2 and 3 bed wheelchair units within the Borough. In this regard, the proposed Affordable Housing mix is considered acceptable.
- 6.7.9 The scheme would deliver 5 studio apartments (within private tenure only) 191 one bedroom units, 237 two bedroom units and 40 three bedroom units and 1 four bedroom unit.
- 6.7.10 The approved reserved matters application also comprised a total of 40% affordable housing (140 units), therefore the revised proposals subject of the current application would result in the same proportion of affordable housing and include an uplift of 40 affordable units on site. All the homes have been designed to be tenure blind so that different tenures are indistinguishable from the street which is welcomed. Based on the above, the affordable housing offer is considered acceptable.

## Housing Output and Unit Mix

- 6.7.11 The London Plan (2021) 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.”
- 6.7.12 The proposed development seeks an overall unit mix of 5 x studios (1.1%); 191 x 1 bedroom units (40.3%); 237 x 2 bedroom units (50%); 40 x 3 bedroom units (8.4%) and 1 x 4 bedroom unit (0.2%). 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 considered that the weight towards larger units i.e. 2, 3 and 4 bedroom units respectively is considered acceptable and coupled with the acceptable affordable housing offer would create a genuinely mixed and balanced community. It is therefore considered that the quantum of dwellings and tenure mix would make a valuable contribution to meeting local housing needs in the borough.
- 6.7.13 The London Plan (2021) removes the density matrix that was previously included in order to promote a design led approach rather than the application of a prescriptive matrix. Policy GG2 of The London Plan (2021) 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 Plan. The proposed development will provide 474 new homes, which generates a density of 182.3 dwellings per hectare (495 habitable rooms per hectare) based on a combined site area of 2.6 hectares. The density of the scheme has been determined through a design led approach taking into account of the site context and infrastructure capacity.
- 6.7.14 In considering the design attributes of the scheme against the proposed density, the LPA consider the dwelling mix to be appropriate, the quality of design to be of a high standard and an appropriate level of site coverage ratio, amounting to 30% (excluding podium gardens) of development against the remaining open space areas. In this regard, it is considered that the housing output is appropriate for the site and would result in a good balance between built form and open space.

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

6.8.1 The relevant policies are:

- The London Plan (2021): T4, T5, T6
- Harrow Core Strategy (2012): CS1
- Harrow Development Management Policies Local Plan (2013):DM1, DM42

6.8.2 The Transport Assessment submitted in support of the application concludes that there is expected to be a negligible uplift in trips generated by the development when compared against the approved reserved matters application. It is not anticipated that there will be any further impact on the local highway network following the relatively modest uplift in the number of proposed units. The impacts, both network-wide and at a strategic level, are considered to be low.

6.8.3 In response to Healthy Streets and Vision Zero, the Transport Assessment analyses all of the key routes surrounding the site and the measures suggested to improve key indicators such as making roads easy to cross, making people feel safe and creating cleaner air. Furthermore, it will not have significant adverse impacts on the capacities or safe operation of the surrounding transport networks.

6.8.4 It is important to note that the plots within the wider Harrow View East site, which have been subject to a number of Reserved Matters applications, have a combined total parking ratio of 0.33 spaces/dwelling, with the lowest of 0.11 consented on Plot A3. Given that the Site forms part of an Outer London Opportunity Area (Harrow & Wealdstone) the maximum car parking standard is 0.5 spaces/dwelling based on the London Plan.

6.8.5 The Proposed Development will provide a total of 152 car parking spaces for residents, which provides a parking ratio of 0.32 spaces per dwelling. The previously approved reserved matters application proposed a total of 121 parking spaces at a ratio of 0.35 spaces per dwelling. As with other plots at Eastman Village, residential parking will be provided in the form of two podium car parks on Plot C1 within Block G and H, accommodated below shared communal gardens. 116 car parking spaces will be accommodated within the podiums whilst 22 on-street residential spaces will be provided at Plot C1 and 14 on-street residential spaces will be provided at Plot B1.

6.8.6 Vehicular access to Plot C1 will be taken from Harrow View and via Primary Street which continues via Plot C1 towards Plots D1-D6 to the south-east of Plot C1. The design of Primary Street within this new full planning application reflects the same design as agreed for the reserved matters application. The exception to this is the location of the podium car park accesses and minor amendments to the on-street parking and landscaping. Primary Street is proposed to be adopted by LB Harrow and has been designed with a 6.0m carriageway. Vehicular access for Plot B1 will be taken from the existing Hargrave Drive and there will be on-street parking

spaces similar to the proposals within the reserved matters application. Approximately 9 on-street car parking spaces, including two spaces within the loading bay, will be provided for retail customers on Primary Street, within Plot C1. This is a reduction on the 11 spaces within the approved reserved matters application for Plot C1's leisure/community uses. The specific time restrictions for these spaces would be confirmed by LB Harrow as part of adopting Primary Street, though it is expected that they would be free to use with a maximum stay of at least 30 minutes.

6.8.7 Residential car parking will be prioritised for larger family dwellings on a first-come-first-serve basis. As per Policy T6.1 'Residential Parking' of the London Plan, 3% of all dwellings will have a designated accessible parking space from the outset and these spaces are included within the podiums of the individual plots. If demand necessitated, the additional 7% accessible parking could be provided in the future through replacement of standard spaces within the Plot C1 podiums or through conversion of on-street spaces. As per the approved reserved matters application, it is proposed that 1 car club space is provided on Primary Street. Several car club spaces are already provided as part of the wider Harrow View East site and the requirement for additional spaces in the Proposed Development will be confirmed by the car club operator in due course, depending on demand for the service.

6.8.8 As per Policy T6.1 of the London Plan, 20% (30) of all residential spaces will have active charging facilities with passive provision for all remaining spaces.

#### Cycle Parking

6.8.9 The proposed residential cycle parking provision by plot is outlined in the table below. 5% of the total long stay provision will be in the form of Sheffield stands with spaces for larger and adapted cycles. Two-tier racks will provide space for the remainder.

6.8.10 Cycle parking provision for the proposed development is based on the minimum standards in the Intend to Publish London Plan. All long-stay spaces will be provided in secure and covered locations in line with Draft London Plan and London Cycling Design Standards. Short-stay cycle parking will be situated within the public realm in visible, convenient locations which provide step-free access and are within 15m of the main entrance of their allocated residential core or non-residential unit.

6.8.11 In consideration of the above, the Proposed Development is therefore in line with Policy T5 of the London Plan, which requires a greater level of cycle parking than the adopted London Plan (2016).

#### Servicing

6.8.12 Communal entrances to each building are provided in close proximity to the street to allow direct access for drop-off and deliveries from the street.

Access for deliveries, furniture removals and maintenance will be off a dedicated lay-by located on The Avenue at the northern end of The Lane. Blocks located along the Green Link can be serviced by the access route adjacent to Plots D5 and D6. Blocks G1 and G4 can be accessed from the services route connecting via Plot D7. Plot C1 incorporates a delivery loading bay on The Avenue which is segregated from both the pedestrian and vehicular flows. This loading bay will operate on a time restricted basis which will allow for full servicing of the community convenience, as well as a timed refuse collection zone and occasional short-term retail parking in times not reserved for the above.

### Conclusion

- 6.8.13 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 above.

## **6.9 Development and Flood Risk**

- 6.9.1 The relevant policies are:
- The London Plan (2021): SI12, SI13
  - Harrow Core Strategy (2012): CS1
  - Harrow Development Management Policies Local Plan (2013): DM1, DM9, DM10
- 6.9.2 The applicant a Flood Risk Assessment (FRA) for this site. The entirety of the site and surrounding areas are shown to be within Flood Zone 1 i.e. land having a less than 1 in 1,000 annual probability of fluvial or tidal flooding. The FRA confirms that there is negligible risk of tidal flooding.
- 6.9.3 Wealdstone Brooke and Yeading Brook are located to the east and northwest of the site respectively. Based on the EA's Flood Risk from Surface Water mapping, the site is considered to be at low risk of fluvial flooding.
- 6.9.4 The EA's Surface Water Flood Risk mapping shows that majority of the site to be at 'low risk' of surface water flooding. However, there are some isolated areas of potential surface water flooding shown within the site. The FRA states that these areas are isolated and the proposed surface water drainage system will reduce the risk of such potential water flooding/ ponding. Further, the slight gradient across the site means that any overland flows will be directed from the site. The FRA concludes that the site will be at low risk of surface water flooding. In addition, the FRA concludes that the site is at low risk of groundwater flooding. In order to afford the site addition protection from any potential 'residual' flood risk, finished floor levels will be set a minimum 'standard' of 0.15m above adjacent infrastructure thoroughfare levels.

- 6.9.5 The Drainage Strategy submitted in support of the application explains that numerous SUDS features will be used to achieve greenfield run-off rates and ensure that surface water run-off is carefully managed. These features include swales, attenuation ponds, rain gardens and green roofs. These features will provide water quality as well as amenity benefits.
- 6.9.6 The Flood Risk Assessment confirms that the site is at low risk of flooding from all potential sources. Furthermore, all finished floor levels will be set at a minimum 'standard' 0.15m above adjacent infrastructure thoroughfare levels. Safe access and egress have also been demonstrated showing the development will not result in the loss of floodplain storage.
- 6.9.7 The FRA has been reviewed by the Council's Drainage Authority and they have stated that the Flood Risk Assessment and drainage strategy submitted are satisfactory, however the following details are still required and can be conditioned.
- The green roof details which includes the cross section of green roof construction and their maintenance plan should be submitted.
  - Foul water discharge level consented by Thames Water should be submitted.

### Summary

- 6.9.8 In summary, subject to the applicant submitting the above details and the imposition of appropriate drainage conditions, it is considered that the proposal would be acceptable.

## **6.10 Trees, Ecology and Biodiversity**

- 6.10.1 The relevant policies are:
- The London Plan (2021): G6, G6
  - Harrow Core Strategy (2012):CS1
  - Harrow Development Management Polices Local Plan (2013):DM1, DM20, DM21
  - Harrow and Wealdstone Area Action Plan: AAP12
- 6.10.2 The application was accompanied by a Biodiversity Enhancement Strategy, Biodiversity Net Gain Assessment and Calculations prepared by Middlemarch Environmental.
- 6.10.3 Plots B1 and C1 were cleared of all existing buildings in Summer 2019 under the extant outline planning permission. The report concludes existing site presents only limited ecological value in the form of scattered trees. Protection methods have been identified regarding the scattered trees, nesting birds, terrestrial mammals and invasive species to ensure compliant with relevant wildlife legislation. The net gains to biodiversity have also been provided and the proposed development is stated to deliver an uplift of 2.30 habitat units, a site increase in biodiversity value of 205.80% over the current habitat value. The proposed development also result in an increase in 0.13 hedgerow units, a site increase in biodiversity

of 186.77% over the current habitat value. Other species-specific biodiversity enhancements have been recommended to be incorporated into the proposed development including the installation of bat, bird boxes and invertebrate features.

- 6.10.4 The Ministry of Defence have raised concerns in relation to the impact of the buildings on the birdstrike safeguarding zones, particularly in relation to the creation of new habitats resulting from the provision of green roofs may be attract and support populations of large and, or flocking birds close to the aerodrome and to the potential increase in birdstrike risk to aircraft operations as a result. Conditions have been suggested. On review of these conditions, the LPA consider that as conditions have not previously been imposed on taller elements (18 storeys) approved under the wider masterplan it would be unreasonable to add these at this stage. Furthermore, it is considered that the conditions to be imposed may prejudice the ecological policies which promote urban greening and biodiversity enhancement within all new developments. As such, the LPA do not consider the suggested conditions to be appropriate to this scheme.
- 6.10.5 The Biodiversity Officer was consulted on the proposal and considers that given the new proposals will increase pressure on due to the number of people and their associated activities, the likelihood of delivering promised ecological gain levels or for the site to contribute positively to the local ecological network is reduced compared to the previous scheme. Contribution to mitigate the additional impact through retro greening measures of some other areas within the neighbourhood is recommended.
- 6.10.6 As the aforementioned matters could be secured via condition, Officers are satisfied that the proposals meet the development plan objectives in terms of biodiversity enhancement. On that basis, the proposed development complies with the National Planning Policy Framework (2019), policy G9 of The London Plan (2021), policy CS1 of the Core Strategy (2012), policies DM1, DM20 and DM21 of the Harrow Development Management Policies Local Plan (2013).

### Trees

- 6.10.7 An Arboricultural Method Statement was submitted in support of the planning application. It is noted that Tree Group G13 identified within the Tree Plan are covered by a Tree Preservation Order (TPO) (Ref: 874), however these are identified as being of low retention value ( The report confirms that it would be necessary to remove an individual tree (T74) within Plot B1 to enable development on this site as well as a number of trees forming Group G13 within Plot C1, due to their proximity to the frontage of the proposed buildings. It is therefore considered that the loss of these specimens would not result in detrimental impact to the visual amenity of the site. Replacement planting is also proposed. A condition to ensure that no works to any further trees protected by TPO (including those subject to pruning) is recommended without prior written consent of the LPA, unless authorised as part of the current application.

6.10.8 The Council's Tree Officer has reviewed the documentation and considers that subject to the aforementioned condition, the application would accord with the relevant policies listed above.

## **6.11 Energy and Sustainability**

6.11.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2021): GG6, D14, SI1, SI2, SI3, SI4, SI5, SI12, SI13
- Harrow Core Strategy (2012): CS1T, CS1U, CS1W, CS1X
- Harrow Development Management Policies (2013): DM12, DM13, DM14, DM15

6.11.2 The Energy Assessment produced by Silcock Dawson & Partners has been developed in line with the London Plan 'Energy Hierarchy', which encourages a tiered approach to low carbon design, comprising: adoption of measures for energy demand reduction (Be Lean) in the first instance, integration of energy efficient supply (Be Clean) secondly, and use of renewable energy (Be Green) as the final consideration. It is demonstrated that the energy strategy can exceed energy and carbon policy targets and the energy efficiency measures combined with renewable energy technologies deliver a 43% carbon dioxide reduction.

6.11.3 The proposed development will be served by a communal energy system granted approval as part of the planning applications for Plots D7 and D8, which forms part of the wider Harrow View LLP site. The CHP in the Harrow View LLP site Energy Centre will act as the lead heat source for the community heating system to generate 60% of the annual heat demand, reducing the emissions by 129 tonnes when using SAP 2012 emission factors. Photovoltaic panels will be mounted on the roofs of Plots B1 and C1. The remaining carbon for the residential aspect to be offset by a cash in lieu payment to be secured in the Section 106 agreement. In relation to overheating, the risk analysis has been carried out in accordance with recommended best practice CIBSE Technical Memoranda 59 design methodology.

6.11.4 The overheating risk assessment shows that the apartments in Plot B1 have a low risk of overheating. Just 3 of the 16 rooms modelled failed the TM59 overheating criteria. These failures would be mitigated by the introduction of internal blinds or other measures such as alternative glazing specification where required. Blinds will be provided where necessary to fixed windows and balcony doors in Plot C1. This will reduce the solar gains and result in 14 of the 23 rooms studied complying with the TM59 overheating criteria. The spaces that fail are generally in apartments that have a southerly aspect. The degree of failure is slight with the number of hours above the comfort range being around 3.5% of the occupied hours in comparison to the target of 3.0%. Mitigation measures to reduce the solar gain will be investigated at the next design stage this may include for

example a further reduction of the G value or the use of solar reflective blinds.

- 6.11.5 The community spaces at ground floor level of Plot C1 are being constructed to a shell specification and their final uses are unknown at this stage. For the purposes of the overheating assessment an office type use has been assumed and shows a low risk of overheating if natural ventilation is applied when simulated using DSY 1 weather data. However, due to the ground floor location and potential security issues it is proposed that these spaces will have active cooling as part of the final fit out solution, but this will be dependent on the ultimate use.
- 6.11.6 The use of low flow efficient sanitary ware, water meters, leak detection and flow regulators will all assist in reducing potable water consumption on site. The Energy Statement submitted in support of the application concludes that the Non-domestic spaces within the development will include efficient water fittings as part of their fit designs, with flow rates restricted to meet BREEAM WAT 01 excellent standard.
- 6.11.7 The GLA raised a number of concerns regarding the Energy Strategy. They stated that The proposals require further supporting evidence and minor amendment for the Be Lean, overheating and PV. The decarbonisation plan for the DHN is also required to be resolved. The DHN heat pump feasibility document should be submitted and agreed between GLA and the proposed network operator before the use of SAP 2012 emission factors can be permitted.
- 6.11.8 In response the application has addressed the issues raised. The Energy Centre has been designed and main equipment procured. The construction is underway on site as part of the first phase of the development (being built pursuant to the 2015 outline permission) and is known as D8. The buildings encompassed within the proposed development shall be served from this existing energy centre (D8) as detailed in the masterplan, and in line with the site wide approved Energy Strategy. Please refer to the proposed heat pump feasibility report for details of the proposed future decarbonisation strategy.
- 6.11.9 Whilst a small number of rooms do not fully comply with the requirements of CIBSE TM59 the low number of non-compliances are by a small margin at up to 3.5% against a target of 3.0%. The building design is limited by the precedents set by previous planning permissions, which determines the general form and orientation of the blocks, however the design incorporates significant measures to reduce the effect of solar gains and improve ventilation rates as described below. The apartment balconies have been arranged to reduce the solar gains to the rooms below. Solar control glazing is proposed to all elevations with a value of 0.4 unless these can demonstrate low levels of solar gain. Blinds will be provided to all windows but are only simulated on fixed windows and balcony doors. Opening windows have been simulated on fixed windows and balcony doors. Opening windows have been simulated without the blinds in use, so the

effective windows have been simulated without the blinds in use, so the effective opening area will not be affected. The blinds in use, so the effective opening area will not be affected. The blinds on the balcony doors will be fixed to the door leaf, not the door frame, so will not obstruct air flow. All required blinds will be included within the base build installation. All windows will have the facility to open fully, including inward fully openable panes to deliver the maximum possible ventilation.

6.11.10 The Energy Strategy is considered acceptable overall, subject to the Stage 2 response from the GLA.

## **6.12 Land Contamination**

6.12.1 The relevant policies are:

- The London Plan (2021): SD1
- Harrow Core Strategy (2012): CS1
- Harrow Development Management Policies Local Plan (2013): DM15

6.12.2 The applicant has submitted a Ground Investigation Report and Remediation Method Statement to support this application. Both reports formed part of the submission of application P/1347/18, which was submitted pursuant to condition 27 attached to the outline permission P/2165/15, which required a) site investigations scheme; b) the results of the site investigation and remediation strategy and c) a verification plan setting out the data that will be collected in order to demonstrate that the works sets out in the remediation strategy are complete and identifying any requirement for any long term monitoring of pollutant leakages, maintenance and arrangements for contingency action. Both reports set out that no further desk based assessment or ground investigation works have been undertaken in the intervening period and that the overarching conclusions and remedial measures detailed within the original 2018 reports remain unaltered and valid.

6.12.3 The details pursuant condition 27 of P/2165/15 have been approved on 09 December 2015 for the land covering Zones B to D of the wider masterplan site, to which this current application site falls within (Zones B and C). As such, there is no further requirement for land contamination assessment to be secured by condition. The development therefore complies with the National Planning Policy Framework (2019), policies SI1 and SI5 of The London Plan (2021), policy CS1 of the Core Strategy (2012), policies DM1, DM12 and DM14 of the Harrow Development Management Policies Local Plan (2013).

## **6.13 Air Quality/ Wind Microclimate**

6.13.1 The relevant policies are:

- The London Plan (2021): D8, SI1
- Harrow Core Strategy (2012): CS1.T
- Harrow Development Management Policies Local Plan (2013): DM15

- 6.13.2 Harrow is within an 'Air Quality Management Area (AQMA) due to the exceedance of the annual and hourly mean Nitrogen Dioxide and the 24 hours mean small airborne particles.
- 6.13.3 Monitoring of air quality within the London Borough of Harrow is undertaken at two automatic monitoring stations. One location along Pinner Road, monitored roadside concentrations of NO<sub>2</sub>, whilst the other at Stanmore monitored urban background concentrations of NO<sub>2</sub>. Meteorological conditions have a significant influence over air pollutant concentrations and dispersion. 2019 meteorological data in the assessment is derived from the London City Airport Meteorological Station.
- 6.13.4 In terms of potential effects during construction, the main emissions are likely to be dust and particulate matter generated during earth moving (particularly during dry months), or from construction materials. In relation to potential effect of the completed development, additional vehicle movement associated with the Proposed Development will generate additional exhaust emissions, such as NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> on the local and regional road networks however the impact is considered to be 'negligible' at all existing receptors.
- 6.13.5 In terms of construction, good practice mitigation measures relating to communications, dust management, earthworks, construction, and trackout are to be included within the previously approved CEMP (for Plot B1) and the proposed CLP (for Plot C1). With the implementation of these appropriate mitigation measures, the risk of adverse effects due to emissions from the construction phase will not be significant. The building emissions are considered Air Quality Neutral. Both transport NO<sub>x</sub> emissions and transport PM<sub>10</sub> emissions are below the transport emission benchmark. In accordance with the GLA Air Quality Neutral Guidance, the development is considered 'neutral' in terms of Air Quality from transport emissions and no mitigation measures are required. As demonstrated above, Policy SI1 of the London Plan, and Policy DM1 of the Development Management Policies DPD are satisfied. The GLA have provided detailed comments at Stage 1 referral and the applicants will be addressing the matters raised prior to the Stage 2 referral.

#### Wind Microclimate

- 6.13.6 A Wind Microclimate Impact Assessment for the development was undertaken to assess the local wind environment associated with the completed development, and the resulting pedestrian comfort within and immediately surrounding the site. The assessment uses a 'future baseline' to assess the wind conditions in and around the site; this includes Plots D7 and D8 that form part of the masterplan but have already been built out and are deemed to be 'existing.' The 'propose' scenario includes buildings in the future as well as the wider Harrow View East site, Harrow View West and Headstone Drive development.

- 6.13.7 Overall, the baseline future wind conditions are considered suitable for pedestrian comfort throughout the site during the most challenging conditions (winter). The majority of the area is also shown to be comfortable for either occasional sitting or standing.
- 6.13.8 For Plot B1 specifically there are generally no comfort concerns as most of the area is considered for 'frequent sitting' and 'occasional sitting.' Balconies, deck access and terraces are also considered suitable for their intended comfort use within Plot B1. However, for Plot C1, it is expected a higher increase in wind speeds compared to Plot B1 and the rest of the masterplan site as a result of the varied building massing and being more open to the effects of the predominant wind direction. It is however mostly comfortable for 'sitting' or 'standing with small areas on Primary Street and the Green Link (East) considered to be suitable for 'walking.'
- 6.13.9 The area on Primary Street is a thoroughfare for vehicles and pedestrians and the area on Green Link (East) is a wide area surrounded by two of the largest buildings on the masterplan site (D5 and H1). It is also located at the junction where other laneways meet, causing windspeeds to be elevated. Informal seating has been proposed where 'standing' comfort conditions are shown, in addition to seating provided in areas identified as suitable for 'sitting.' Whilst most of the balconies and terraces are fully suitable for their intended comfort use, it is noted that 9 balconies have shown comfort levels of 'walking' whilst most the area is suitable for 'standing' and therefore considered acceptable.
- 6.13.10 The Council's Landscape Officer has reviewed the details of the document and confirms there are no concerns raised with Plot B1 with most of the area achieving acceptable wind comfort levels of 'frequent sitting' or 'standing.' Within Plot C1 there are sufficient areas proposed for sitting that would be within the right comfort zones, although some of the seating is provided in areas where 'standing' comfort is shown. On balance, this is not a cause for concern since there is a choice of locations. There is a small area on Plot C1, Block H podium on the southern edge which is shown to be 'unsafe' – strong winds. The landscaping has not been included in the assessment and therefore the wind study shows the worst-case scenario. This does not appear to be a significant issue once the proposed landscaping and balustrading is installed. The barrier of the balustrade plus the added vegetation should mitigate the possible problem, and this area should be carefully detailed to ensure the wind is mitigated.
- 6.13.11 Based on the above, it is considered that the wind microclimate arising from the proposed development is acceptable.

## **6.14 Statement of Community Involvement**

- 6.14.1 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.

- 6.14.2 Prior to the submission of this application, the applicant sent a letters to the members of Harrow Council and key stakeholders to meet to discuss the initial proposals in August 2020. Further to this, meetings were held with Magnolia Residents Association (28/09/2020) and Harrow Cyclists (20/10/2020). The proposals were also taken to the Council's Major Development Panel, public meeting which took place 03 November 2020.
- 6.14.3 Local residents were given the opportunity to review the proposals and provide feedback during an 'at-a-distance' consultation which ran from 28<sup>th</sup> October 2020 to 16<sup>th</sup> November 2020. To promote the consultation a letter informing local stakeholders of the consultation was also sent on 31<sup>st</sup> October 2020 encouraging their feedback. Furthermore letters to 573 nearby residents were sent to advertise the consultation requesting feedback to be provided by 03 November 2020. A postal version of the consultation documents were also sent to 3,179 local residents on 03 November 2020, who could provide feedback either online or via a freepost address. An advert in the Harrow Times detailing the 'at-a-distance' consultation was also included.
- 6.14.4 Overall, the consultation website was viewed by 300 people, with visitors spending an average of 3 and half minutes on the website. 80 feedback forms were submitted via the website and 14 postal forms were received.
- 6.14.5 Following the validation of the planning application, the Council sent letters of consultation to local residents in the surrounding area inviting them to make representations on the proposed development. In addition, site notices were displayed, and the application was advertised in the local newspaper.
- 6.14.6 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.

## **6.15 Section 106 Obligations**

- 6.15.1 The relevant policies are:
- The London Plan (2021): DF1, H4, H5, H6
  - Harrow Core Strategy (2012): CS1.Z/AA, CS2.Q
  - Harrow Development Management Policies Local Plan (2013): DM50
  - Planning Obligations and Affordable Housing Supplementary Planning Document (2013)

- 6.15.2 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 H4, H5, H6 and DF1 of The London Plan (2021), Core Strategy (2012) policy CS1, policies AAP3, AAP13 and AAP19 of the Harrow and Wealdstone Area Action Plan(2013) and policies DM1, DM2 DM42, DM43 and DM50 of the Harrow Development Management Policies Local Plan and the Supplementary Planning Document: Planning Obligations (2013).

## **7.0 CONCLUSION AND REASONS FOR APPROVAL**

- 7.1.1 The redevelopment of the site would enhance the urban environment in terms of material presence, attractive streetscape, and good routes, access and makes a positive contribution to the local area, in terms of quality and character and delivering new public spaces to support the wider masterplan and community. The massing and scale proposed would appropriately relate to the wider masterplan site and would permit full optimisation of this previously developed land to bring forward much needed housing which would positively add to the Council's housing delivery targets.
- 7.1.2 The proposal would secure the provision of affordable housing at a level that meets the minimum affordable housing target set out in the development plan.
- 7.1.3 The proposals would not give rise to any unreasonable impact upon the amenities of any neighbouring occupiers and will provide satisfactory living accommodation for potential occupiers. It is considered that the external appearance, scale, layout, access and landscaping scheme submitted is acceptable and it is recommended that the application is approved
- 7.1.4 The decision to grant planning permission has been taken having regard to the National Planning Policy Framework (2019), the policies of The London Plan (2021), Harrow's Core Strategy (2012), the policies of the Harrow and Wealdstone Area Action Plan (2013) and the policies of the Harrow Development Management Policies Local Plan (2013), as well as to all relevant material considerations including the responses to consultation.

## **Appendix 1 – CONDITIONS AND INFORMATIVES**

- 1 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 & Country Planning Act 1990.

- 2 Save where varied by other planning conditions comprising this planning permission or unless otherwise agreed in writing by the local planning authority, the development hereby permitted shall be carried out in accordance with the following approved plans to show the redevelopment of the site to include the erection of buildings of up to 14 storeys and up to 474 residential units together with up to 456sqm GIA of non-residential floorspace and 649sqm GIA community floorspace:

Approved Plans:

Approved Documents:

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

- 3 No development shall take place in relation to Plot C1, until a Detailed Construction Logistics Plan has been submitted to, and approved in writing by, the local planning authority in accordance with the format and guidance provided by the Transport for London - [www.constructionlogistics.org](http://www.constructionlogistics.org). The Detailed Construction Logistics Plan shall provide for:

- a) Parking of vehicles of site operatives/visitors;
- b) HGV access to site - loading and unloading of plant and materials;
- c) Number of HGV's anticipated;
- d) Storage of plant and materials used in constructing the development;
- e) Programme of work and phasing (in line with the Phasing Strategy to be submitted pursuant to condition 3 attached to this permission);
- f) Site layout plan;
- g) Highway condition (before, during, after);
- h) Measures to control dust and dirt during construction;
- i) A scheme for recycling/disposing of waste resulting from demolition and construction works;
- j) details showing the frontage/ the boundary of the site enclosed by site hoarding to a minimum height of 2 metres; and
- k) Details of cranes and other tall construction equipment (including obstacle lighting).

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

REASON: To minimise the impacts of construction upon the amenities of neighbouring occupiers and to ensure that development does not adversely affect safety on the transport network. Details are required **PRIOR TO COMMENCEMENT OF DEVELOPMENT** to ensure a satisfactory method of construction is agreed prior to any works on site commencing.

- 4 Notwithstanding the approved Drainage Strategy, no development in relation to each Plot C1 shall take place until details of works for the disposal of surface water, including surface water attenuation and storage, have been submitted to, and agreed in writing by, the local planning authority. The submitted details shall include measures to prevent water pollution and details of SuDS and their management and maintenance. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development achieves an appropriate greenfield run-off rate in this critical drainage area and to ensure that sustainable urban drainage measures are exploited. To ensure that measures are agreed and built-in to the development to manage and reduce surface water run-off, this condition is a PRE-COMMENCEMENT condition to ensure satisfactory drainage can be provided on site to serve the development.

- 5 Notwithstanding the approved Drainage Strategy, no development in relation to each Plot C1 shall take place until a foul water drainage strategy, has been submitted to and agreed in writing by the local planning authority. The development shall not be occupied until the agreed drainage strategy has been implemented.

REASON: To ensure that there would be adequate infrastructure in place for the disposal of foul water arising from the development, and to ensure that the development would be resistant and resilient to foul water flooding. To ensure that measures are agreed and put in place to dispose of foul water arising from the development, this condition is a PRE-COMMENCEMENT condition.

- 6 No site works or development in relation to Plot C1 shall commence until details of the levels of the building(s), road(s) and footpath(s) in relation to the adjoining land and highway(s), and any other changes proposed in the level of the site, have been submitted to, and agreed in writing by the local planning authority. The development shall be carried out in accordance with the details so agreed.

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

- 7 The development hereby approved in relation to each building or plot (whichever is relevant) shall not progress beyond damp proof course level until a Fire Statement produced by a third party suitably qualified assessor has been submitted to, and agreed in writing by, the local planning authority. The development shall be carried out in accordance with the strategy so agreed and shall be retained as such thereafter unless otherwise agreed by the local planning authority or Fire Authority.

REASON: To ensure that the development proposals achieve the highest standard of fire safety.

- 8 Notwithstanding the details shown on the approved drawings, the development relating to each building or plot (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.

- 9 The development hereby approved for each relevant building or plot (whichever is relevant) as noted below shall not progress beyond damp proof course level until:

- a) one x 1:1 sample mock-up of the blocks within Plot B1; and
- b) one x 1:1 sample mock of the each of character area blocks within Plot C1.

Details to include the balcony, window opening and two brick piers to be used in the external faces of the buildings have been erected on site (or at such other location(s) as may be agreed in writing by the local planning authority) and agreed in writing by, the local planning authority. The development shall be carried out in accordance with the details, samples and drawings so agreed and shall be retained as such thereafter.

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

- 10 The development hereby approved in relation to criterion a) and b) below concerning each building or plot (whichever is relevant) shall not progress above podium level and in the case of Plot B1 above first floor 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;
- 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.

- 11 The development hereby approved in relation to each building or plot (whichever is relevant) shall not progress above podium level and in the case of Plot B1 above first floor level, until details to show that appropriate noise mitigation measures in line with the strategy set out in the submitted RBA Acoustics Planning Report have been incorporated within the design of each building (including appropriate glazing and Mechanical Ventilation and Heat Recovery System) has been submitted to, and agreed in writing by, the local planning authority. The details shall include independent acoustic testing where applicable. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development achieves a high standard of amenity for future occupiers of the site and provides adequate noise mitigation.

- 12 The development hereby approved in relation to each building in Plot C1 shall not progress above podium 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.

- 13 The development hereby approved in relation to each building or plot (whichever is relevant) shall not be occupied until details of the lighting (full specification, elevations and location) of all public realm and other external areas (including buildings and the podium car park/ garden) within the site has been submitted to, and agreed in writing by, the local planning authority. 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 incorporates lighting that contributes to Secured by Design principles and achieves a high standard of residential quality.

- 14 The development hereby approved in relation to each building or plot (whichever is relevant) shall not be occupied until details of a strategy for the provision of communal facilities for television reception (eg. Aerials, dishes and other such equipment) have been submitted to and approved in writing by the Local Planning Authority. Such details shall include the specific size and location of all equipment. The approved details shall be implemented prior to the first occupation of the relevant building and shall be retained thereafter. No other television reception equipment shall be introduced onto the walls or the roof of the building without the prior written approval of the local planning authority.

REASON: To ensure that any telecommunications apparatus and other plant or equipment that is required on the exterior of the buildings preserves the high quality design of the buildings and spaces and to ensure that the development achieves a high standard of amenity for future occupiers the buildings.

15 The development hereby approved in relation to each plot (unless otherwise specified) as noted below shall not be occupied until the following details have been submitted to, and agreed in writing by, the local planning authority:

a) A scheme for detailed hard and soft landscaping of the development, to include details of the planting, hard surfacing materials, raised planters and external seating. Soft landscaping works shall include: planting plans (at a scale not less than 1:100), written specification of planting and cultivation works to be undertaken and schedules of plants, noting species, plant sizes and proposed numbers / densities and an implementation programme. The hard surfacing details shall include samples to show the texture and colour of the materials to be used and information about their sourcing/manufacturer. The hard and soft landscaping details shall demonstrate how they would contribute to privacy between the approved private terraces and the public pedestrian route, and communal podium garden/open space areas;

b) Details of all furniture, boundary treatment (both public, private and works associated with existing boundary along Harrow View), public realm wayfinding signs, irrigation if proposed, specification for the landscape structures (including proposed material and source) and detailed drawings of such; details of the vent grilles to all communal areas including vent screening and raised beds;

c) A specification of all play equipment to be installed including provision for children with disabilities and special sensory needs; a specification of the surface treatment within the play areas; and arrangements for ensuring the safety and security of children using the play areas;

d) Full scale metric cross section plans for all open spaces (at a scale of not less than 1:100) (including the area between the western side of the blocks and the boundary with Harrow View), including private communal open space. Full elevations and cross-sections for the podium level (where proposed) including the proposed details for the external walls (including ventilation) for the podium deck and should include tree planting/ fixing details for the podium levels;

e) In relation to Plot C1 only hard and soft landscape details and planting plans for the green roofs which shall include written specification of the planting and the biodiverse roof detail make build-up of the layers, including the substrate and schedules of plants, noting species, plant sizes or types (all at time of planting) proposed numbers / densities and details of the maintenance including irrigation; and

f) In relation to Plot C1 only proposals for increasing the availability of bird nesting places and bat roosts within the site (including detailed specification and locations of boxes and in-built features) together with details of their ongoing maintenance/ monitoring and any necessary replacement.

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

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes to the creation of a high quality, accessible, safe and attractive public realm; to ensure a high standard of design, layout and amenity and to make appropriate provision for the protection, enhancement, creation and management of biodiversity within the Heart of Harrow.

- 16 The development hereby approved in relation to each building or plot (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 The development hereby approved in relation to each building or plot (whichever is relevant) shall not be first occupied until a parking management plan has been submitted to, and agreed in writing by, the local planning authority. The plan shall make provision for:
- a) details of how the parking spaces would be managed and allocated, including any enforcement procedure for any unauthorised parking on the site and assurance from the developer/owner that it shall fund the installation of the passive electric charging points as set out under sub-section b) below as and when required;
  - b) identify the electric vehicle charging point spaces that are to be provided within the podium car park as 'active' spaces' and those as 'passive' spaces', which shall include 20% fully active provision and remaining 80% to have passive provision;
  - c) details of the relevant disabled person's parking spaces within the development (for residents);
  - d) details of the provision of cycle parking for residents and visitors to the development, which shall include the type of cycle stands proposed (including specification);
  - e) details and location of the spaces for parking motorbikes/scooters; and
  - f) details of a servicing and delivery management plan.

The development shall be carried out in accordance with the plan so agreed prior to the occupation of the relevant plot or building and shall be retained as such thereafter.

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

- 18 The development hereby approved in relation to each building or plot (whichever is relevant) shall not be first occupied until a scheme for the on-going management, management programme of works and maintenance of all the hard and soft landscaping within the development, to include a Landscape Management Plan, including long term design objectives, management responsibilities and maintenance schedules to include details of the arrangement for the implementation for all landscape areas (including communal residential areas), other than small, privately owned, domestic gardens, shall be submitted to, and approved in writing by, the local planning authority. Details shall also include schedule of landscape maintenance for year 1, years 2-5 and on-going maintenance from year 6 onwards. The Landscape Management Plan shall be carried out in accordance with the details as approved.

REASON: To safeguard the appearance and character of the area, and to enhance the appearance of the development.

To ensure that the development makes provision for hard and soft landscaping which contributes (i) to the creation of a high quality, accessible, safe and attractive public realm and (ii) to the enhancement, creation and management of biodiversity within the Heart of Harrow and to ensure a high standard of design, layout and amenity.

- 19 Prior to the first occupation of each building or plot (whichever is relevant), the applicant shall apply for a Secured by Design Certification which shall be submitted and approved in writing by the local planning authority. Secure by design measures shall be implemented where practical 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.

- 20 The relevant building or plot (whichever is relevant) hereby approved shall not be occupied until: (i) an audio-visual access control system has been installed; or (ii) such alternative security measures have been installed that shall first have been submitted to, and agreed in writing by, the local planning authority.

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

- 21 Within 3 months (or other such period agreed in writing by the local planning authority) of the final completion of the relevant building(s) a post construction assessment shall be undertaken demonstrating compliance with the approved Energy Statement; which thereafter shall be submitted to the local planning authority for written approval.

REASON: To ensure the delivery of a sustainable development.

- 22 The mail boxes as shown on the approved plans shall be installed to ensure that they secure and meet all safety standards and shall be made available prior to the first occupation of each relevant building.

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

- 23 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.
- 24 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.
- 25 The residential units hereby approved shall each be provided with storage space in accordance with standard set out under Table 3.1 (Minimum Space Standards for new dwellings) appended to policy D6 of the London Plan (2021) 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
- 26 The development hereby permitted shall be constructed to include 90 per cent of the new homes to meet Building Regulations requirement Part M M4(2) 'accessible and adaptable dwellings' with the remaining 10 per cent meeting Building Regulations requirement Part M M4(3) 'wheelchair user dwellings' and thereafter retained in that form.  
  
REASON: To ensure that the development is capable of meeting 'Accessible and Adaptable Dwellings' standards.
- 27 Deliveries to any non-residential uses within the development shall take place only between the hours of 6.30am and 11pm on Mondays to Saturdays and between the hours of 8.30am and 10pm on Sundays and Bank Holidays, unless otherwise agreed in writing by the local planning authority.  
  
REASON: To ensure that the noise impact of deliveries associated with non-residential uses within the development is minimised and that the development achieves a high standard of amenity for future and the neighbouring occupiers.
- 28 The non-residential flexible active premises hereby approved on development shall only be open to the public between: 7am and 11pm on Mondays to Saturdays; and 8.30 am and 10.30pm on Sundays and Bank Holidays.  
  
REASON: To ensure that the operation of the ground floor uses is compatible with residential amenity.

- 29 The flexible community uses hereby permitted within the ground floor of blocks G1, G4 and H1 in Plot C1 shall only be used for community uses falling within Class E, (f) and (g)(i), Class F.1 (a), (b), (c), (d), (e) and (g) and Class F.2 (b) and for no other purpose, including any other purpose in Classes E, F.1 and F.2 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (or in any provision equivalent to that Class in any Statutory Instrument revoking and re-enacting that order with or without modification).

REASON: To safeguard the amenity of neighbouring residents and the character of the locality and in the interests of highway safety.

- 30 The retail uses hereby permitted in Plot C1 shall only be used for uses falling within Class E(a), (b), (c), (d), (e) and (g), and for no other purpose, including any other purpose in Classes E, F.1 and F.2 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (or in any provision equivalent to that Class in any Statutory Instrument revoking and re-enacting that order with or without modification).

REASON: To safeguard the amenity of neighbouring residents and the character of the locality and in the interests of highway safety.

- 31 In relation to the non-residential uses hereby permitted no music or any other amplified sound caused as a result of this permission shall be audible at the boundary of any residential premises either attached to, or in the vicinity of, the premises to which this permission refers.

REASON: To ensure that the proposed development does not give rise to noise nuisance to neighbouring residents.

- 32 Unless otherwise agreed in writing by the local planning authority, access to all podium gardens shall be unrestricted during the daylight hours (except in the case of an emergency or for maintenance purposes) and shall only be secured from public access (other than from residents of the relevant building) during the night time only.

REASON: To ensure that adequate safety and privacy is maintained for residents of the relevant plots and to encourage social cohesion for future residents of this development.

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

REASON: To safeguard the appearance and character of the surrounding area and to ensure a high standard of residential quality in accordance.

- 34 In relation to Plot B1 only, the works for the disposal of surface water, including surface water attenuation and storage together with the foul water strategy shall be undertaken in accordance with the details approved under application P/2468/19 dated 12/07/2019. The development shall thereafter be retained in that form.

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 and to ensure that there would be adequate infrastructure in place for the disposal of foul water arising from the development, and to ensure that the

development would be resistant and resilient to foul water flooding.

- 35 In relation to Plot B1 only, the development shall be carried out in accordance with the site levels approved under application P/2113/19 dated 17/07/2019. The development shall be retained in that form thereafter.

REASON: To ensure that the works are carried out in accordance with the approved details 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.

- 36 In relation to Plot B1 only, the development shall be undertaken in accordance with the mains water strategy approved under application P/0225/21 dated 17/03/2021. The development shall be retained in that form thereafter.

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

- 37 In relation to Plot B1 only, the bird and bat boxes, and invertebrate shelter shall be installed in accordance with the details approved under application P/0259/21 dated 19/03/2021. The development shall be retained in that form thereafter.

REASON: To make appropriate provision for the protection, enhancement, creation and management of biodiversity within the Heart of Harrow.

## **INFOMATIVES:**

### 1 **Relevant Policies**

The following policies are relevant to this decision:

#### **National Planning Policy Framework (2019)**

##### **The London Plan (2021)**

Policies: SD7, GG2, D1, D2, D3, D4, D5, D6, D7, D8, D9, D11, D13, D14, H1, H4, H5, H6, H7, H10, H15, G5, G6, G7, SI 2, SI 1, SI 3, SI 4, S1 5, S1 7, SI12, SI13, T2, T4, T6, T6.1, T6.3, T6.5

##### **The Harrow Core Strategy (2012)**

Core Policies CS1

##### **Harrow and Wealdstone Area Action Plan (2013)**

Policies: AAP1, AAP3, AAP4, AAP5, AAP6, AAP8, AAP9, AAP10, AAP11, AAP12, AAP13, AAP17, AAP19, AAP20

##### **Development Management Policies Local Plan (2013)**

Policies DM1, DM2, DM3, DM7, DM9, DM10, DM12, DM13, DM14, DM15, DM20, DM21, DM22, DM23, DM24, DM27, DM28, DM35, DM42, DM45, DM49

Supplementary Planning Document - Residential Design Guide (2010)

Code of Practice for Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (2016).

Mayors Housing Supplementary Planning Guidance (2016)

Mayors Accessibility Supplementary Planning Guidance (2014)

Mayors Affordable Housing and Viability Supplementary Planning Guidance (2017)

- 2 **INFORMATIVE:**  
The applicant's attention is drawn to the requirements in the Considerate Contractor Code of Practice. In the interests of minimising any adverse effects arising from building operations, the limitations on hours of working are as follows:  
0800-1800 hours Monday - Friday (not including Bank Holidays)  
0800-1300 hours Saturday
- 3 **INFORMATIVE:**  
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 Portal website:  
<https://www.gov.uk/party-wall-etc-act-1996-guidance>
- 4 **INFORMATIVE:**  
**IMPORTANT: 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.
- 5 **INFORMATIVE:** 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 £2,316,420  
The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).

You are advised to visit the planningportal website where you can download the appropriate document templates.

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

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

[https://ecab.planningportal.co.uk/uploads/1app/forms/cil\\_questions.pdf](https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf)

If you have a Commencement Date please also complete CIL Form 6:

[https://ecab.planningportal.co.uk/uploads/1app/forms/form\\_6\\_commencement\\_notice.pdf](https://ecab.planningportal.co.uk/uploads/1app/forms/form_6_commencement_notice.pdf)

The above forms should be emailed to [HarrowCIL@Harrow.gov.uk](mailto:HarrowCIL@Harrow.gov.uk)

Please note that the above forms must be completed and provided to the Council prior to the commencement of the development; failure to do this may result in surcharges and penalties

- 6 INFORMATIVE: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 £6,115,348.80

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

7 INFORMATIVE:  
The applicant is advised to engage with the Designing Out Crime Officer at an early stage of the detailed design stage in respect of meeting the requirement of Secured by Design condition.

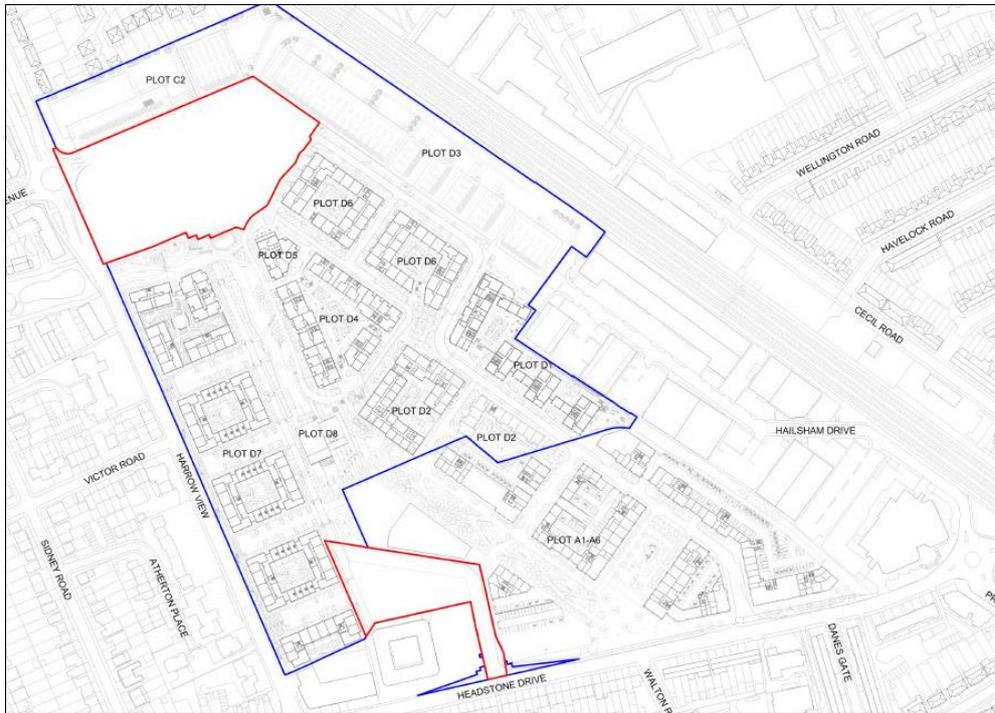
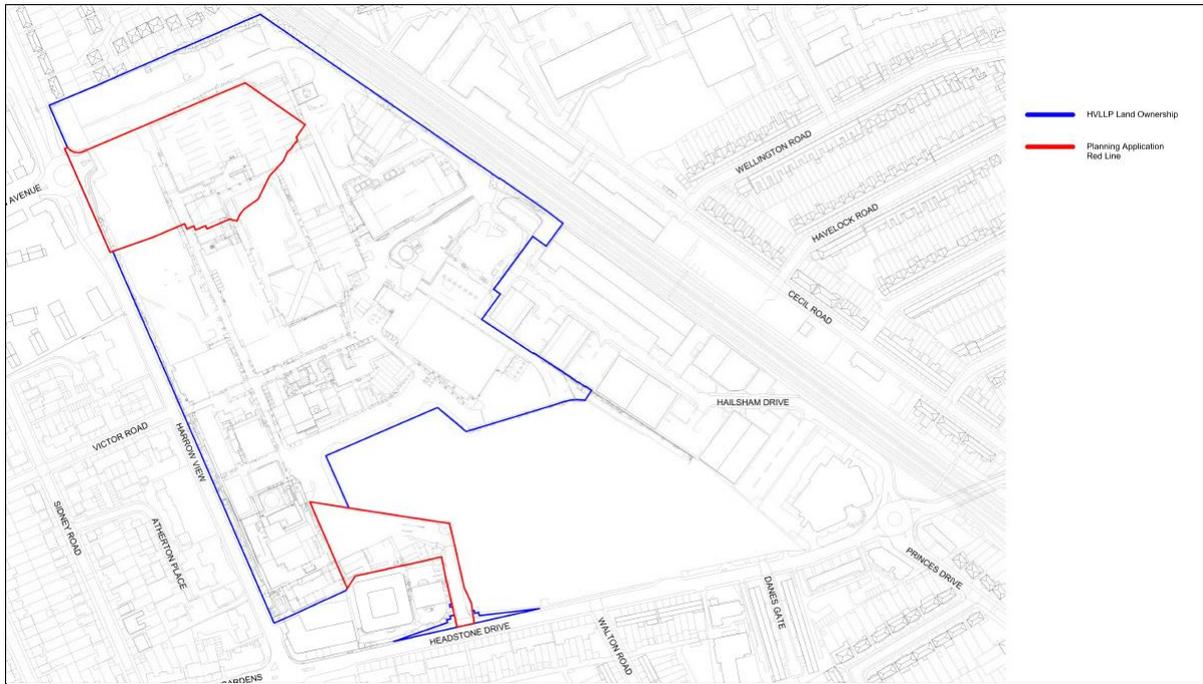
8 INFORMATIVE:  
A Landscape Management Plan would be expected to set out, graphically and / or in writing, the overall functional and aesthetic objectives of the landscape scheme and the steps (eg legal arrangements including ownership and management responsibilities, planned maintenance tasks, any 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.

Landscape Maintenance refers to the routine physical tasks (e.g. strimming, pruning, weeding, plant replacement, watering, litter clearance, maintenance of furniture, pergolas and plant supports, raised beds, green roofs, living wall climbing structure, play features, any decorative landscape lighting etc.) required to satisfy appropriate standards of aftercare and to enable the design and implementation objectives in respect of planting to be satisfactorily achieved. It is essential to identify who is responsible for these tasks.

A Schedule of Maintenance Operations is normally a component of a Landscape Management Plan and commonly included within a Landscape Design Specification document.

Interim Chief Planning Officer	Beverley Kuchar 01/04/2021
Corporate Director	Paul Walker 01/04/2021

## APPENDIX 2: SITE PLAN



### **APPENDIX 3: SITE PHOTOS**

Existing site under demolition





View from Harrow View looking south



View from Princes Drive



View from Headstone Manor



View from Graham Road



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

Approved Outline (P/2165/15)



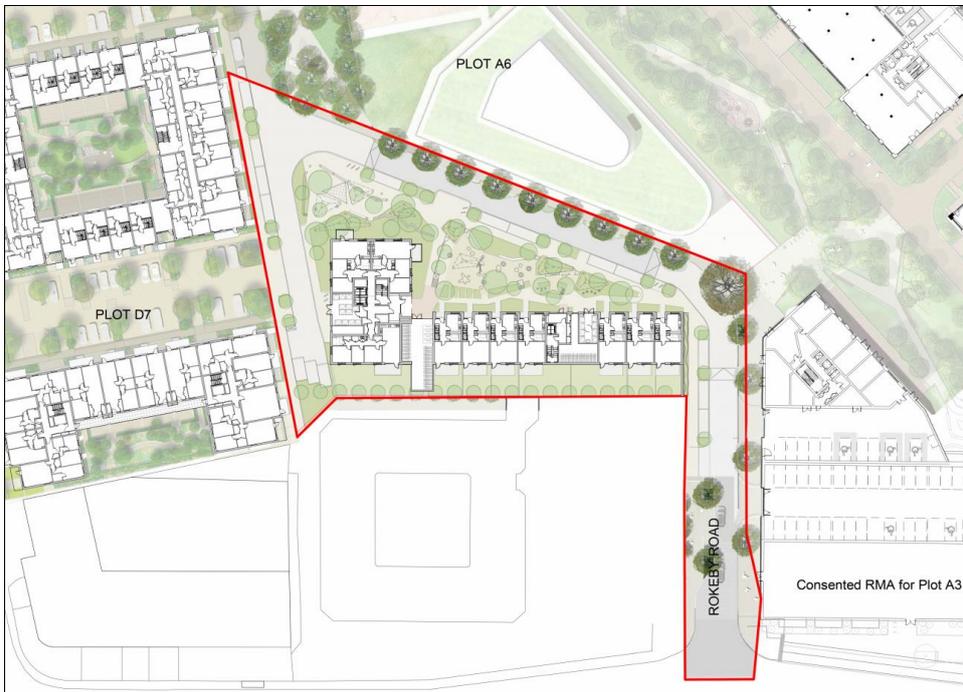
Emerging Masterplan



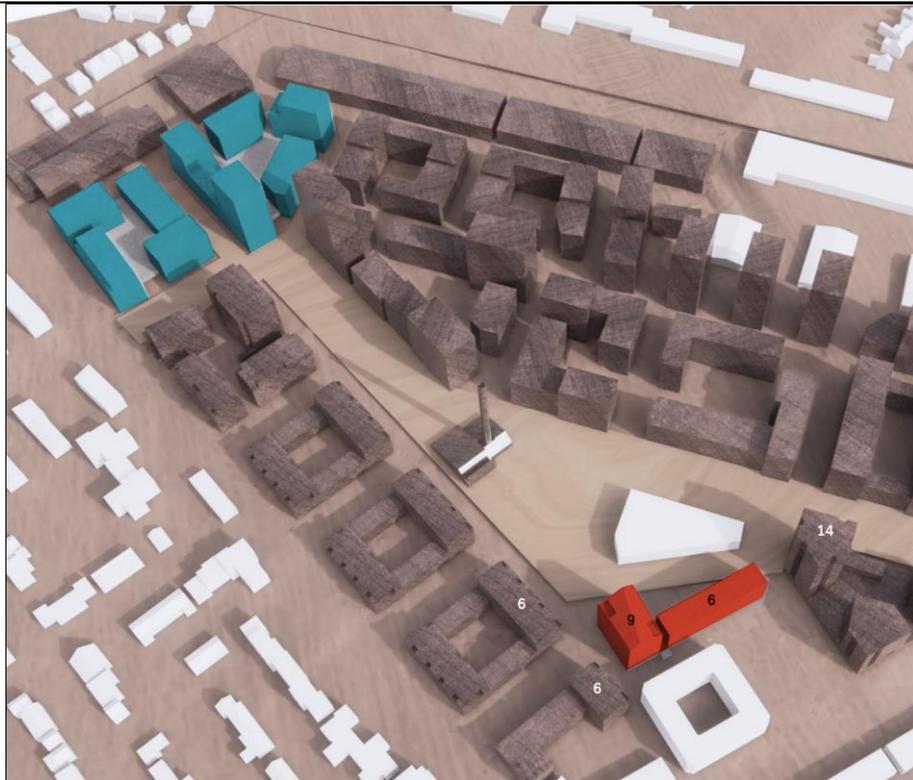
## Proposed Site Plan



## Proposed Ground Floor Plan – Plot B1



## Proposed Ground Floor Plan – Plot C1





## Visualisations Plot B1



## Proposed Elevations Plot C1







## Visualisations Plot C1





Visualisation of the Avenue



Visualisation of the Green Link

## APPENDIX 5: GLA STAGE 1 REPORT

GREATER LONDON AUTHORITY

planning report GLA/2021/0101/S1/01

1 March 2021

### Plots B1 and C1, Harrow View East Masterplan

Local Planning Authority: Harrow

local planning authority reference: P/4581/20

<p><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.</p>
<p><b>The proposal</b> The development of Plots B1 and C1 at Harrow View East (former Kodak Factory) for 474 residential dwellings, 456 sq.m. of retail floorspace and 649 sq.m. of community floorspace in buildings ranging in heights between 5 and 14 storeys in height, together with associated car and cycle parking, open space, landscaping and ancillary development including all necessary infrastructure works.</p>
<p><b>The applicant</b> The applicant is Harrow View LLP (Joint Venture between Barratt London and Hyde Group), and the architect is Pollard Taylor Edwards (PTE).</p>
<p><b>Strategic issues</b> <b>Land use principle:</b> The optimisation of land and contribution towards increased housing delivery is supported in line with the London Plan and Harrow and Wealdstone Area Action Plan, subject to confirmation from the Council that the relocation of the approved leisure land use is acceptable (paragraphs 21-27). <b>Affordable housing:</b> The provision of 40% affordable housing (with grant, by habitable room) is strongly supported. The scheme may be eligible to follow the Fast Track Route subject to confirmation that the proposed offer comprises 35% affordable housing without public subsidy; that the proposed tenure split is acceptable to the Council; that the site does not comprise public land and that the scheme meets other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor. An early stage viability review mechanism and affordability levels must be secured within a S106 agreement (paragraphs 30-36). <b>Urban design:</b> The layout of the scheme is generally supported. The site has an approved extant planning permission, and there are buildings up to 18 stories in height located within the wider masterplan; on this basis, the Council has identified that the site has potential for some tall buildings, and the criteria in Policy D9 are addressed in the application. Further consideration should be given to elements of residential quality, and further detail is required in respect of the fire and play strategies. Inclusive design requirements should be secured by condition (paragraphs 37-62). <b>Transport:</b> A number of recommendations are included in the Active Travel Zone Assessment, which should be secured through the grant of any planning permission. (paragraph 88-91). Other strategic issues relating to energy, air quality, sustainable drainage, water efficiency, biodiversity, green infrastructure and urban greening and the circular economy also require resolution.</p>
<p><b>Recommendation</b> That Harrow Council be advised that the application does not yet fully comply with the Mayor's London Plan, for the reasons set out in paragraph 95 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.</p>

## Context

1 On 23 December 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 his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the Order 2008:

- Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."
- Category 1B(c): "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."
- Category 1C(1c) - "Development which comprises the erection of a building that is more than 30 metres high and is outside the City of London".

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

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

## Site description

5 This application relates to B1 and C1 the wider Kodak factory outline masterplan (LPA ref: P/3405/11), also referred to as Harrow View East.

6 The Kodak factory site is located to the west of Wealdstone District Town Centre and falls within the Harrow and Wealdstone Opportunity Area as identified by the Mayor's London Plan. The site also forms part of the Harrow Housing Zone, the boundary of which corresponds with that of the Opportunity Area. The Kodak factory masterplan site lies to the east of Harrow View and is a roughly triangular plot of approximately 16 hectares - bound by suburban residential hinterland to the north, the Waverly Industrial Estate and railway line to the east, Headstone Drive to the south, and Harrow View to the west. The site is not within a conservation area and does not contain any statutorily listed buildings, however there are designated and non-designated heritage assets in proximity to the site.



Figure 1: Existing site plan in context of emerging masterplan

7 The application site (Plot B1 (A) Phase 2, Plot C1, Phase 2) is a 2.1 hectares in size. The site lies approximately 1 kilometre from Harrow and Wealdstone station (National Rail, London Underground and Overground services) and about 900 metres from Headstone Lane station, which is served by Overground services. Harrow on the Hill Station is approximately 2 kilometres from site, which is served by London Underground and national rail services. Three bus routes run adjacent to the site. The nearest part of the Strategic Route Network (SRN) lies some 800 metres to the east and west. The public transport access level (PTAL) of the site ranges from 0 to 3, on a scale of 0 to 6b, where 6b the highest. Most of the site is either 3 or 2 with a small area of 0 to the north-west.

### Details of the proposal

8 The proposal is for the development of Plots B1 and C1 at Harrow View East (former Kodak Factory) for 474 residential dwellings (duplexes and apartments), 456 sq.m. of retail floorspace and 649 sq.m. of community floorspace in buildings ranging in heights between 5 and 14 storeys in height, together with associated car and cycle parking, open space, landscaping and ancillary development including all necessary infrastructure works.

9 The proposed development in Plot B1 is for 74 new homes. This is an uplift of 14 dwellings from the approved reserved matters application. In line with the approved reserved matters application, 100% of units are for London Affordable Rent. The proposed development in Plot C1 is for 400 new homes. This is an uplift of 110 dwellings from the previously approved reserved matters application. Plot C1 includes Block G at its western edge and Block H at the eastern end. 71 units are proposed as shared ownership and 35 units are proposed as London Affordable Rent. A breakdown of the housing proposals, by tenure and by plot, is set out in Table 1, below:

Table 1: Housing proposals, by tenure

	Plot B1	Plot C1	Total
Market	0	294	294
Intermediate	0	71	71
London Affordable Rent	74	35	109
Total	74	400	474

## Case history

10 Following consultation with the Mayor (GLA reference: D&P/2830/02), Harrow Council approved planning permission for the Kodak outline masterplan (P/3405/11) in December 2012. The masterplan included two parcels of land: Harrow View East (the Kodak factory site); and, Harrow View West (the adjacent former Kodak sports ground). In accordance with the approach established within the Harrow and Wealdstone AAP, significant consolidation of the Wealdstone Strategic Industrial Location was accepted in order to enable delivery of a wide range of regenerative benefits as part of a comprehensive mixed-use development. This permission approved up to 35,975 sq.m. business and employment space, 985 residential dwellings, up to 220 units of student accommodation, up to 9,300 sq.m. senior living accommodation and assisted living accommodation, up to 5,000 sq.m. retail and restaurant uses, up to 8,830 sq.m. of community facilities including primary school, health centre and community and leisure uses, energy centre and associated access, parking, landscaping and provision of utilities.

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

12 The Harrow View West site has been sold by the applicant and is being developed independently by Persimmon Homes.

13 Reserved matters application (reference: P/4610/17) for Zone A addressing all matters for Plots A1, A2, A3(a), A4, A5, the Green Link and Central Green was approved on 15 December 2017. The proposals for the Reserved Matters approval comprised 650 dwellings of which 21.5% were affordable, five flexible use units within

Classes A1-A5, a food store, a health care centre and an energy centre. The proposals also included details for a care home which would be situated on Plot A3.

14 In December 2018, Reserved Matters approvals were granted in relation to a total of 350 residential within Plots B1 and C1 (reference: P/3892/18). This approval granted 60 residential units within Plot B1 in two buildings 5 and 8 stories in height, and 290 residential units in Plot C1 in ten blocks between 5 and 10 stories in height. 768 sqm of leisure use and 636 sqm of community use was also granted within Plot C1. These plots (B1 and C1) are the subject matter for this full planning application.

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

16 The Mayor of London considered a Stage II application (GLA Ref: 4995, LPA Ref: P/3944/19) for the development of Plots D1, D2, D4, D5 and D6 at Harrow View East (former Kodak Factory) for 1,226 residential dwellings (including a 60 unit Extra Care Facility), 362 sq.m. of café/restaurant space, 728 sq.m. of flexible commercial/community uses in buildings ranging in height from two to eighteen storeys; together with new roads, access and circulation, car and cycle parking, open space, landscaping and infrastructure works. The Council subsequently granted planning permission on 6 November 2020.

17 A pre-application meeting (GLA ref: 6610) was also held on the 4 November 2020 between the applicant and officers from the Local Planning Authority, Transport for London (TfL) and the Greater London Authority. A wide range of strategic planning issues were discussed at the pre-application meeting and verbal advice was provided in respect to a number of elements of the scheme including the principle of development, housing and affordable housing, urban design, transport and energy. There was no written pre-application advice issued following the meeting as the applicant advised they intended to submit the planning application imminently.

### **Strategic planning issues and relevant policies and guidance**

18 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 2021 London Plan, which was published and became part of the statutory development plan on 2 March 2021.

19 The following are relevant material considerations:

- The National Planning Policy Framework (February 2019) and National Planning Practice Guidance; and
- The Mayor's Affordable Housing and Viability SPG.

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

- Opportunity areas                      London Plan;

- Land use London Plan;
- Housing and affordable housing London Plan; Affordable Housing and Viability SPG; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;
- Urban design and heritage London Plan; Shaping Neighbourhoods: Character and Context SPG;
- Inclusive design London Plan; Accessible London: Achieving an Inclusive Environment SPG;
- Sustainable development London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;
- Air quality London Plan; Control of dust and emissions during construction SPG.
- Transport London Plan; Mayor's Transport Strategy.

### **Land use principle**

21 The site is located within the Harrow and Wealdstone Opportunity Area. The Mayor's London Plan emphasises the importance of Opportunity Areas in achieving London's growth through their capacity to accommodate large scale developments that provide jobs, housing and enhance placemaking. The Harrow and Wealdstone Opportunity Area is identified in the Mayor's London Plan as having an indicative capacity for a minimum of 1,000 new jobs and 5,000 new homes. Locally, the Harrow and Wealdstone Area Action Plan (HWAAP) identifies the Kodak site as one of the key sites for delivering 1,410 new homes in the Wealdstone West sub area. The site is also located within the Heart of Harrow Housing Zone.

### Housing

22 Policy H1 of the Mayor's London Plan seeks to increase the supply of housing in the capital, setting Harrow a ten-year housing target in the Mayor's London Plan of 8,020 new homes. The proposed development would deliver 474 new homes (an uplift of 124 units from what was previously approved via reserved matters on these plots in December 2018), contributing to this housing target. The proposal involves the optimisation of land and contribution towards housing delivery within this Opportunity Area and housing zone location is supported in accordance with Policies GG2 and H1 of the Mayor's London Plan. Accordingly, the principle of residential development on the site is supported. Affordable housing is discussed in further detail in the subsequent section of this report.

### Non-residential land uses

23 Spatially, Policy SD6 of the Mayor's London Plan adopts a town-centre first approach, which recognises that town centres, should be the foci for commercial development beyond the CAZ, and Policy SD7 of the Mayor's London Plan discourages out-of-centre development of main town centre uses. The application site sits outside of the Wealdstone District Town Centre.

24 The proposal includes approximately 1,104.42 sq.m. of non-residential floorspace with Plot C1 which includes 648.62 sqm (GIA) of community floorspace (comprising

three ground-floor units within Buildings G1, G4 and H1) and 455.8 sq.m. of retail floorspace (at ground floor level of Block G1/G2).

25 The Design and Access statement sets out that the proposed retail land use will be used as a convenience store. Given the small scale of the commercial uses proposed, GLA Officers do not require a town centre impact assessment for this out-of-centre commercial land use in this instance. The proposed retail unit is expected to generate between 21 and 27 full-time employment jobs. While located outside a town centre, the proposed retail unit is small in scale in the context of the wider development and would serve the future residential community through the provision of services, facilities and jobs, in addition to assist in animating key routes (Harrow View and Primary Street), and as such, is supported in principle.

26 Policy S1(c) of the Mayor's London Plan sets out that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported. As such, the provision of the proposed community spaces, providing activation at ground floor level of the green link, is supported in principle. It is noted, however, that the existing reserved matters permission for the site included both a 768 sq.m. of community unit floorspace, as well as the provision of 768 sq.m. of leisure land uses. The application sets out that *"the leisure space will be swapped back into the non-residential space in the recently permitted D1-D6 planning permission"*. Subject to confirmation from the Council that the proposed loss of leisure land uses from within Plot C1 is acceptable and that the leisure floorspace has been suitably secured within the D1-D6 permission, no strategic concern is raised.

27 Noting that the intended use of the proposed community space is currently unknown, the provision of a management and maintenance plan for this space should be secured through the S106 agreement to the operation of the proposed community use is compatible with the proposed residential uses, to ensure the quality of the proposed community space is maintained for the lifetime of the development, and to facilitate the sharing of facilities for different community uses, in accordance with Policy S1 of the Mayor's London Plan.

## Housing

28 Policy H10 of the Mayor's London Plan encourages 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.

29 The housing mix set out in Table 2, below, comprises a range of unit sizes including 1-beds, 2-beds and 3-beds, and a 4-bed, which is supported in principle. Subject to the Council confirming the proposed mix meets local need of the Borough, GLA officers are supportive of the housing mix from a strategic perspective.

Table 2: Proposed housing mix, per plot

Unit	Plot B1	Plot C1	Total	Percentage
Studio	0	5	5	1.1%
1b/2p	25	166	191	40.3%
2b/3p	0	186	186	39.2%

<b>2b/4p</b>	40	11	51	10.8%
<b>3b/4p</b>	0	22	22	4.6%
<b>3b/5p</b>	9	9	18	3.8%
<b>4b/6p</b>	0	1	1	0.1%
<b>Total</b>	74	400	474	100%

#### Affordable housing

30 Policy H4 of the Mayor's London Plan, as well as the Mayor's Affordable Housing and Viability SPG sets a strategic target of 50% affordable housing in all new developments.

31 The Mayor's Affordable Housing and Viability SPG and Policy H5 of the Mayor's 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, meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant and meet the specified tenure mix, in accordance with Policy H5 of the Mayor's London Plan, are not required to submit viability information nor be subject to a late stage review.

32 Policy H6 of the Mayor's 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 more mixed and inclusive communities. In this case, locally, the Harrow Local Plan sets an affordable housing tenure balance of 60% social / affordable rent and 40% intermediate.

33 The Mayor is committed to the delivery of genuinely affordable housing and Policy H6 of the Mayor's 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.

34 The proposal comprises 40% affordable housing (by habitable room, equating to 180 units) of which 37.7% are intermediate (London Shared Ownership) and 62.3% are London Affordable Rent. The application states that the Hyde Group has successfully sought grant funding to increase the level of affordable housing on this site, which

equates to an additional 5% affordable housing and that the application will provide 40% affordable housing on a habitable room basis.

35 The provision of 40 per cent affordable housing may meet the Mayor's threshold approach of 35% affordable housing, subject to confirmation of the following: that the proposed offer comprises 35% affordable housing without public subsidy; that the proposed tenure split is acceptable to the Council; that the site does not comprise public land and that the scheme meets other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant.

36 If the level of affordable housing provision within the scheme is below the Fast-Track Threshold for the site (by habitable room, without public subsidy) at the Mayor's decision-making stage, both an early and late review mechanism will be required to be secured within a S106 legal agreement in line with Policy H5 of the Mayor's London Plan. As set out above, the applicant will also be required to submit a viability assessment which will be robustly scrutinised by GLA Officers in accordance with Policy H5(F) of the Mayor's London Plan. If the Mayor's Fast-Track Route threshold is met and the scheme meets the Fast Track Route criteria, only an early review mechanism would be required (to be triggered if an agreed level of progress on implementation has not been made within two years of any planning permission). 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.

### **Urban design**

37 The design principles in chapter 3 of the Mayor's 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. As per Policy D3 of the Mayor's 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.

38 The scheme has been presented at two independent design review panel sessions, as well as to GLA and Kingston upon Thames planning officers, at pre-application stage. This design-led approach to the development of the scheme is strongly supported.

### Height, massing and architecture

39 The proposals are for buildings between 5 and 14 stories in height. Policy D9 sets out that tall buildings should only be developed in locations that are identified in Development Plans.

40 The proposal meets the definition of a tall building as set out Policy D9 of the Mayor's London Plan, which also makes clear that tall buildings should only be developed in locations identified in local plans as being suitable for such buildings.

41 While clarification is required as to whether the Council has specifically identified the site as having potential for tall buildings within local policy documents, GLA Officers recognise that the site has an approved extant planning permission, and there are buildings up to 18 stories in height located within the wider masterplan. On this basis, GLA Officers note that there is precedent for the application site being considered

potentially suitable for tall buildings by the Council, in accordance with part B of Policy D9. All tall buildings are also subject to the criteria set out in Part C of Policy D9, i.e. high standards of architecture and urban design. The applicant has addressed the criteria in Policy D9 within the submitted application.

42 On the basis of the information submitted within the Design and Access Statement, the analysis shown within the (Built) Heritage, Townscape and Visual Impact Assessment (THVIA), and noting the design-led process that the applicant has undertaken in the development of the scheme, GLA Officers consider that the proposed tall buildings are capable of meeting the design and impact criteria set out in Policy D9. The Council should ensure that all the criteria set out in London Plan Policy D9 have been achieved, including through scrutiny of the daylight, sunlight and wind assessments to ensure satisfactory levels of daylight, sunlight and wind are provided to all residential units, private and communal amenity spaces, as well as public spaces.

43 The consideration of impacts on the wider historic environment are outlined in the heritage section of this report.

44 Further consideration should be given to the creation of added interest in the detailing of Façade 1 and 2. Alternative visuals should also be provided in order to convey the quality of the materiality. The success of the architectural approach will be dependent on the use of the highest quality materials. The use of brick as the predominant building materiality is supported. Key details of window reveals, balconies, parapets, facing materials should be secured to by condition.

#### Layout

45 For Plot C1, the proposals comprise nine buildings, known as G1-G4 and H1-H5, arranged into two urban courtyard blocks ranging from 5 to 14 storeys. Podium gardens are provided at the core of each courtyard block. Car parking is hidden below the communal gardens in parking podiums Plot B1 comprises two blocks laid out in an "L" shape within a triangular plot.

46 The proposal includes a range of planting areas, and present a generally high-quality hard and soft landscape. High quality planting, paving and lighting throughout the scheme should be secured by the Council, and a maintenance and management strategy for the communal spaces within the scheme should be secured.

47 The provision of direct access for individual residential duplexes at ground level of Plot B1 provides activation of the street level, and is supported. To ensure privacy within these ground floor habitable rooms, suitable defensible spaces should be secured by condition.

48 The proposed laneway, located between Blocks G and H in Plot C1 is described within the Design and Access Statement as a space that will provide a *"positive pedestrian experience by accommodating a green and playful public space, ground floor gardens and defensible spaces, access to some residential entrances, as well as accommodating service and refuse access at managed times"*.

49 The provision of the proposed laneway is supported as it provides for public permeability within Plot C1. As noted in the principle section of this report, the provision of a retail unit and the three community units at ground floor level of Plot C1 provides for

animation at ground level adjacent to public spaces, contributing to both the level of safety and vibrancy users within these public spaces will experience.

#### Residential quality

50 Policy D6 of the Mayor's London Plan promotes quality in new housing provision, with further guidance provided by the Housing SPG.

51 All the proposed units have been designed to meet the Nationally Described Space Standards and all units are provided within private outdoor amenity space through way of a garden or balcony.

52 54% of the proposed new homes are dual aspect. While it is noted that all the larger units are provided as dual aspect and that there are no north-facing, single aspect proposed, noting the inherent benefits that the provision of dual aspect provides to residential quality, further clarification is required in respect of this percentage and if there is scope to improve the provision across the scheme.

53 The cores within the scheme are provided with natural daylight serve a maximum of 8 units per floor. The windows provided within these cores should be secured as openable to provide for natural ventilation within these spaces.

#### Play space

54 Policy S4 of the Mayor's 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.

55 For Plot B1, the application sets out that the proposal generates a play space policy requirement of 657 sq.m, comprising 313 sq.m. of play space for 0-4 year olds, 223 sq.m. for 5-11 year olds and 121 sq.m. for 12+ year olds. The proposals included 350 sq.m. of doorstep play space for the 0-4 age bracket and 230 sq.m. of local play space for the 5-11 year olds.

56 For Plot C1, the application sets out that the proposal generates a play space policy requirement of 1,720 sq.m, comprising 905 sq.m. of play space for 0-4 year olds, 598 sq.m. for 5-11 year olds and 260 sq.m. for 12+ year olds. The proposals included 915 sq.m. of doorstep play space for the 0-4 age bracket and 600 sq.m. of local play space for the 5-11 year olds.

57 The application details that the play space for the 12+ age group for both Plots B1 and C1 will be provided on the Green Link (Park) – outside of the red line area.

58 The Green Link (Park) is already approved via the wider masterplan, and the Design and Access Statement states that "*given the extent of the Green Link provided within the wider masterplan area, it is considered that adequate and quality play space will be enjoyed by future residents of C1*". While this statement is acknowledged, further detail is required to demonstrate where this off-site play space is proposed in order to demonstrate that the proposal fully satisfies the needs of the development whilst continuing to meet the needs of existing residents (or in this case, to ensure there is no "double-counting" of playable spaces that have already been approved for other parts of the wider masterplan). Subject to addressing this

requirement of the Shaping Neighbourhoods: Play and Informal Recreation SPG, Harrow Council should secure the proposed off-site play provision (creation of new provision, improvements to existing play facilities and/or an appropriate financial contribution) within a S106 agreement.

59 As per the Play and Informal Recreation SPG, there should be early implementation of the play space in the delivery of this phased scheme and this should be secured within a detailed phasing plan as part of the S106 legal agreement.

60 Policy S4 of the Mayor's London Plan requires that proposals are not segregated by tenure. The proposed on-site play space located within "The Lane" and other public space provided within the site appears to be shared by all residents regardless of tenure, which is supported. Noting there may be some segregation in the play spaces proposed within the residents' podium courtyards through the restriction of access to residents of each respective block, the Council should ensure that all play spaces provided at podium levels are "tenure blind" in terms of both quantum of play space per child and quality of playable features.

61 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 S106 obligation. As also discussed in the Urban Design section of this report, noting the inclusion of vehicle access for servicing and access within "The Lane", there should also be clear separation of any vehicle movements from play spaces to avoid user conflicts within this space, with suitable safety features secured via condition.

#### Fire safety

62 In the interests of fire safety and to ensure the safety of all building users, Policy D12 of the Mayor's London Plan seeks to ensure that development proposals achieve the highest standards of fire safety. Fire strategies produced by Elementa have been prepared for Plot B1 and Plot C1 respectively. The fire strategies should be revised to detail the qualifications of the assessor who has prepared the document. The reports include a number of recommendations in respect to addressing Building Regulation requirements. Compliance with the recommendations included within this report should be secured by the Council. Furthermore, Policy D5(b) of the Mayor's London Plan sets out that in all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building; this should be secured.

#### **Heritage**

63 Policy HC1 of the Mayor's 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 the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation

and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

64 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.

65 The site does not contain any heritage assets nor is the site located within a conservation area, however there are designated and non-designated heritage assets in proximity to the site.

Including the Grade I listed Headstone Manor, the Grade II\* listed barn south west of Headstone manor, the Grade II outbuilding parallel to the barn south of Headstone Manor, the Grade II listed former granary at Headstone Manor and the locally listed (non-designated heritage) underground Air Ministry Citadel (known as Station Z).

66 The submitted HTVIA concludes that which summarises that the proposals would not give rise to any harmful impacts to heritage assets. On the basis of the assessment provided by the applicant, GLA officers are satisfied that there is no resulting harm from the proposed development on the identified heritage assets.

67 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, GLA officers are satisfied that no harm will arise to the nearby designated heritage assets through the delivery of the proposed scheme.

68 Noting the high-quality design of the scheme, the proposed development is generally sympathetic to the form, scale, materials and architectural detail of the nearby designated and non-designated heritage assets, and the scheme accords with Policy HC1 of the Mayor's London Plan.

## **Inclusive design**

69 Policy D5 of the Mayor's 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. Policy D7 of the Mayor's 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.

70 The Design and Access Statement sets out that 90% of the new dwellings will meet Building Regulation requirement M4(2) and 10% will meet Part M4(3) (Wheelchair User Dwellings). The Council should ensure policy compliant levels of accessible dwellings are carried through to the detailed design stages with

appropriate conditions securing the provision and providing accessible units across a range of tenures and typologies, providing disabled and older people similar choices to non-disabled people.

71 As further detailed in the Fire Safety section of this report, a minimum of at least one lift per core (or more subject to capacity assessments) is 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 London Plan. This should be secured through the grant of any planning permission.

## **Environment**

### Energy

72 To ensure compliance with policies of the Mayor's London Plan, further supporting detailed is required in respect of a number of elements of the energy strategy. The proposals require further supporting evidence and minor amendment for the Be Lean, overheating and PV. The decarbonisation plan for the DHN is also required to be resolved. The DHN heat pump feasibility document should be submitted and agreed between GLA and the proposed network operator before the use of SAP 2012 emission factors can be permitted. Detailed technical comments in respect of energy have been circulated to the Council under a separate cover to be addressed in their entirety.

### Air quality

73 The air quality impact assessment provided with the application is not accepted in its current form and should be revised to assess the proposal in accordance with air quality policies set out in the Mayor's London Plan. Detailed comments have been circulated to the Council and the applicant to be addressed in their entirety prior to Stage II.

74 In addition to the provision of a revised air quality impact assessment, in order to secure compliance with Policy SI 1 (D) of the Mayor's London Plan, compliance with the Non-Road Mobile Machinery (NRMM) Low Emission Zone for London should be secured by condition and measures to control emissions during construction and demolition relevant to a *high* risk site should be written into an Air Quality and Dust Management Plan, or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG.

### Flood risk

75 The site is in Flood Zone 1 and is greater than 1 hectare in area and is located within a Critical Drainage Area. A Flood Risk Assessment (FRA) has been submitted as required under the National Planning Policy Framework (NPPF). The FRA adequately assesses the risk of flooding from fluvial/tidal, pluvial, sewer, groundwater, and reservoir flooding, which is considered to be low. The FRA submitted in support of the proposed development complies with and Policy SI.12 of the Mayor's London Plan.

### Sustainable drainage

76 The drainage strategy proposes to restrict runoff from Plot B1 to 1.3 l/s for the 100-year event plus 40% climate change, requiring 77 m<sup>3</sup> attenuation, which will be provided in underground crates beneath the landscaping area. Runoff from the residential blocks in Plot C1 would be restricted to 4.2 l/s for the 100 year event plus 40% climate change, requiring 715m<sup>3</sup> attenuation, which will be provided in tanks beneath the undercroft car parking. The water is then discharged into the Thames Water sewers via a swale. A pond and swale are proposed to provide attenuation and conveyance for the rest of the catchment area in Plot C1.

77 In terms of sustainable urban drainage systems (SuDS), the drainage strategy proposes a swale, pond, rain gardens, and green roofs, which is welcomed. The pond and swale are welcomed, however, further above ground green SuDS should be included to provide the attenuation volume, in particular for plot B1, which in the current design only includes below ground attenuation tanks.

78 Rainwater harvesting should also be provided to satisfy the drainage hierarchy as per Policy SI.13 of the Mayor's London Plan.

79 The Harrow version of the London Sustainable Drainage Proforma should be completed and submitted. The proformas for all Local Authorities can be found [here](#)<sup>1</sup> on the GLA website.

### Water efficiency

80 Information around water consumption targets should be provided in order to demonstrate compliance with Policy SI.5 of the Mayor's London Plan.

### Biodiversity

81 Policy G6 of the Mayor's London Plan state that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain.

82 Evidence should be provided demonstrating that the proposed development secures a net biodiversity gain in accordance with Policy G6(D) of the Mayor's London Plan. If biodiversity net gain is not achievable on the site, opportunities for biodiversity offsetting should be reviewed in consultation with the Council.

### Green infrastructure

83 The urban greening factor (UGF) of the proposed development has been calculated as 0.32, which is below the target of 0.4 set by Policy G5 of the Mayor's London Plan for predominantly residential development. The UGF calculation increases to 0.35 when a section of the proposed green link, subject to other applications, is included. On this occasion, this approach is considered appropriate,

however the applicant should ensure that the same 'share' of the green link is not also apportioned to the UGF of a separate application.

84 Taking the 0.35 UGF, the proposals remains short of the 0.4 target set out in the Mayor's London Plan. The application material explains that this is on predominantly due to the inclusion of roads delivered as part of the scheme. Accepting that this is a constraint to the delivery of urban greening at the ground level, the applicant should review the urban greening proposed across the wider site prior to Stage 2, seeking to improve the quality or quantity, to increase the UGF. Features for consideration may include: improving the quality of the proposed green roof (currently extensive green roofs/sedum mats are the predominant form proposed), including a green wall or sections of the building façade, introduce further planting at the ground level, or improve its quality by replacing with areas of rain gardens or semi-natural vegetation.

85 A plan showing the surface area types in more detail should be submitted, along with an updated table. The surface cover types diagrams (page 128 of the DAS) are currently very small and appear to overstate the extent of greening, for example the entire roof space and entire internal ground level in C1 appears to be proposed for urban greening. This is not consistent with the wider application material so should be clarified through a more detailed UGF drawing.

### Trees

86 The Arboricultural Report states that "*the majority of trees situated within the outline of Plot C1 are to be retained... it will be necessary to remove an individual tree... within B1 and a number of trees forming a group G13 within Plot C1*". The report concluded that the loss of these specimens would not be detrimental, given the proposed tree planting. The scheme accords with Policy G7 of the Mayor's London Plan.

### Circular economy

87 Policy SI7 of the Mayor's London Plan requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, whilst Policy D3 requires development proposals to integrate circular economy principles as part of the design process. The GLA has released draft guidance for developers on how to prepare Circular Economy Statements and a 'Design for a circular economy' Primer that helps to explain the principles and benefits of circular economy projects. A Circular Economy Statement is required to be prepared and submitted in accordance with the GLA guidance prior to decision making stage.

## **Transport**

### Active Travel Zone

88 The Healthy Streets Transport Assessment includes an Active Travel Zone assessment which sets out a range of recommendations. The delivery of these recommendations should be secured as part of any planning permission.

### Car and Cycling Parking

89 The proposed cycle parking is in accordance with the minimum standards set out in the Mayor's London Plan Policy T5, including 5% spaced for larger and adaptable bikes.

90 The consented car parking provision on Plot B1 is 0.23, and 0.37 on Plot C1, giving a total of 121 spaces. The proposed provision car parking provision is greater than currently permitted however, the ratio of 0.32 per unit is in accordance with the wider car parking provision on site.

### Public Transport

91 Public transport funding has been secured in context of the outline and wider development. For this application, a further financial contribution is not required.

### **Local planning authority's position**

92 GLA Officers understand that Harrow Council planning officers have engaged in pre-application discussions with the applicant and are undertaking an assessment of the submitted planning application.

### **Legal considerations**

93 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**

94 There are no financial considerations at this stage.

### **Conclusion**

95 London Plan policies on land use principle, housing, affordable housing, urban design, play space, heritage, inclusive design, energy, air quality, flood risk, sustainable drainage, water efficiency, biodiversity, green infrastructure and urban greening, trees, circular economy and transport are relevant to this application. The below issues must be addressed to ensure the proposal complies with the London Plan:

- **Land use principle:** The optimisation of land and contribution towards increased housing delivery is supported in line with the London Plan and Harrow and Wealdstone Area Action Plan, subject to confirmation from the Council that the relocation of the approved leisure land use is acceptable.
- **Affordable housing:** The provision of 40% affordable housing (with grant, by habitable room) is strongly supported. The scheme may be eligible to follow the Fast Track Route subject to confirmation that the proposed offer comprises 35% affordable housing without public subsidy; that the proposed tenure split is acceptable to the Council; that the site does not comprise public land and that the scheme meets other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor. An early stage viability review mechanism and affordability levels must be secured within a S106 agreement.
- **Urban design:** The layout of the scheme is generally supported. The site has an approved extant planning permission, and there are buildings up to 18 stories in height located within the wider masterplan; on this basis, the Council has identified that the site has potential for some tall buildings, and the criteria in Policy D9 are addressed in the application. Further consideration should be given to elements of residential quality, and further detail is required in respect of the fire and play strategies. Inclusive design requirements should be secured by condition.
- **Energy:** Further supporting detailed is required in respect of a number of elements of the energy strategy. Detailed technical comments in respect of energy have been circulated to the Council under a separate cover to be addressed in their entirety.
- **Air quality:** The air quality assessment should be revised to realistically and appropriately assess air quality impacts arising from the proposal. assessments. Detailed technical comments in respect of air quality have been circulated to the Council under a separate cover to be addressed in their entirety. A number of conditions are also recommended.
- **Sustainable drainage and water efficiency:** The surface water drainage strategy for the proposed development does not give appropriate regard to the provision of above ground green SuDS for Plot B1. Rainwater harvesting also needs to be included in line with the London Plan drainage hierarchy. Information around water consumption targets should be provided.
- **Biodiversity and urban greening:** Evidence should be provided demonstrating the proposed development secures a net biodiversity gain. A review and updated Urban Greening Factor calculation should also be provided.
- **Circular economy:** A Circular Economy Statement should be prepared and submitted in accordance with the GLA guidance demonstrating the development proposals have integrated circular economy principles as part of the design process.
- **Transport:** A number of recommendations are included in the Active Travel Zone Assessment, which should be secured through the grant of any planning permission.

## **APPENDIX 6: DRP PANEL REVIEW SUMMARY**

Beverley Kuchar  
Harrow Council  
Civic Centre  
Station Road  
London HA1 2XF

18<sup>th</sup> September 2020

Dear Beverley

### **Harrow Council Design Review Panel: Harrow View East Plots B1 & C1**

As you know, Harrow View East Plots B1 and C1 was seen by the Design Review Panel on the 11<sup>th</sup> September 2020. I am writing to summarise the Panel's comments.

The Panel's comments on progress to date and recommendations moving forward are as follows:

#### **General**

The Panel was impressed by the clarity of the presentation and is supportive of the principle of increased height and unit numbers on both sites, but was concerned that the current proposal compromises the quality of the homes and place.

#### **Plot B1**

##### **Public realm and play**

There is a missed opportunity to consider the relationship between the school and this site. The school needs to be indicated on all drawings for both plots. Currently it seems that this area will be open space and not building. The relationship with the school has an impact on the public realm and needs greater thought. There is currently parking shown lining the street between B1 and the school. A generous table crossing could be considered to break up the cars, and planting and furniture would be a better barrier between the pavement and carriageway. The Muf play street precedent shown is a good example, and completely closing the street to traffic and removing most of the parking, as shown there, would be a really positive move that the Panel urge the applicant team to consider. The Panel recognise this is a primary access route and would need to be reconsidered – would it be possible to relocate it to the other side of Plot B1?

The proposed play space looks very appealing and there are some good and inventive ideas. The edge to the place space would benefit from further definition, potentially with a ha-ha or bund – there needs to be a clear threshold to separate it from the road and prevent

children from running into the street. Some interesting precedents were shown, but the Panel would like to see some examples from comparable urban situations.

Edges and boundaries in general would benefit from further work. The North East corner feels tight and could be opened up better. The Southern boundary treatment to the site is yet to be defined. This will be visible from some areas of the public realm, and a well detailed wall would be a good solution.

### **Roof**

There is potential for the top floor homes in the taller block to have additional ceiling height into the roof. This could make some good spaces, and it is important to be clear about how this will work. It would be disappointing if the roof remained an empty void, but equally issues around energy demand and overheating for the increased volume would need to be considered.

### **Plot C1**

#### **The Avenue**

The Avenue has always been a problematic area of the masterplan, and it is important that any changes do not reverse some of the good work done (in the previous application) to enliven the streetscape. Articulation of the Avenue blocks is important and the principle of difference across the HVE plots is good, but the current proposal - varying the heights by only a storey at a time - is not bold enough. More variation, articulated frontage lines and bigger jumps in height should be looked at. The commitment to difference across the site has always been positive, and it is important not to lose this. There is a long enough stretch along the Avenue to accommodate more significant changes in height and different façade types – some blocks could have inset balconies and there could be more deliberate variation in brick colour. The precedents shown are strong and show a singular material approach which should be explored. The diagram showing material shift across the site is good, and this statement of intent needs to follow through into a bolder approach for the proposals.

#### **Tower**

The additional height to the tower helps to create a good contrast and is welcomed. However, it will overshadow the Eastern courtyard. Options to relocate the tower to the Avenue should be looked at.

#### **The Lane**

The Lane has always been a challenging space, but it had potential to be one of the few calm and quiet spaces in the masterplan. The increase in height to both sides has undermined these qualities and it has lost its unique character. Light levels are a significant concern here, especially considering the amount of play space the Lane accommodates. The precedents shown do not relate closely enough to the scale of the space, and more care is needed to define its identity – could it return to a cobbled space with pots? Currently two overloaded cores are accessed from the middle of the lane, contradicting the vision for minimal vehicle movement described. The Panel is not convinced by the current proposal for this space, and more thought is needed to make this important space work.

## Homes

The previous application had well laid out blocks with good homes. While the Panel supports an increased density in principle, it is only acceptable to do so if the homes remain of equal quality to the previous application. There should be a maximum of eight units per core, and North facing single aspect units (which would also have poor outlook onto the Big Yellow site), and the awkward corner units, should be designed out. The cores were previously in the corners, having good natural light, and relocating these should be looked at.

## Courtyards

The increase in density has put significant pressure on the courtyards. The neighbouring green link does not compensate for poor quality communal landscaped space, and it is important to make sure that these spaces remain high quality and are well used. Including the gap in the North East corner is positive, but what does this corner space become? Throughout the site the courtyard spaces have been designed to be as permeable as possible, encouraging use and activity. These qualities should not be lost in the current proposal, and the Panel is concerned that without a clearly defined use (i.e. being the primary access to homes) or route through the courtyards they will become unused sterile spaces. A podium drawing is critical to understand how the ground floor actually works and the relationship between podium and street. This should indicate circulation and demonstrate that there is a clear route through the courtyards. Dual aspect homes also help to improve residents' connection with the courtyards – if they can't see the space, and children can't see when their friends are there, they are less likely to use it.

## Landscape

The detail and character of the landscape proposals is welcomed. The areas to the West and East are working well. But the Panel is concerned though that the precedents being referenced for the Lane are not of an appropriate scale or type, and that the intentions for this space will not be successful. As advised above, more work is needed in general to resolve the Lane, and it is important that a holistic approach to landscape and massing is taken in order to define the identity of this space.

## Summary

As set out above, the Panel supports the principle of increased height and density. However, the current proposals feel compromised in multiple areas and the quality of the homes, communal spaces and public realm are suffering.

More work is needed to explore the relationship between the school and plot B1, particularly to reduce the dominance of traffic and parking and make a clear threshold between the play area and the street. The Southern boundary to this plot must not be overlooked and should also be carefully designed.

Plot C1 is more problematic, and the Panel has particular concerns about the quality of the homes – including number of units to a core and North facing single aspect units. The articulation along the Avenue is currently unresolved and needs some bolder moves to retain variation. The quality of the Lane has been significantly impacted by the increased heights and density, and this space needs some careful thought to ensure that it has an equally strong identity to the previous application. The Courtyards are also under pressure,

and these spaces must be shown to work. Relocating the tower to avoid overshadowing the Eastern courtyard should be explored.

The Panel would welcome the opportunity to review the scheme again.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tim Riley', with a stylized, cursive script.

Tim Riley

...

The Panel was:

Tim Riley - DRP Chair  
Dinah Bomat - DRP member  
Chris Fellner - DRP member  
Graeme Sutherland – DRP member