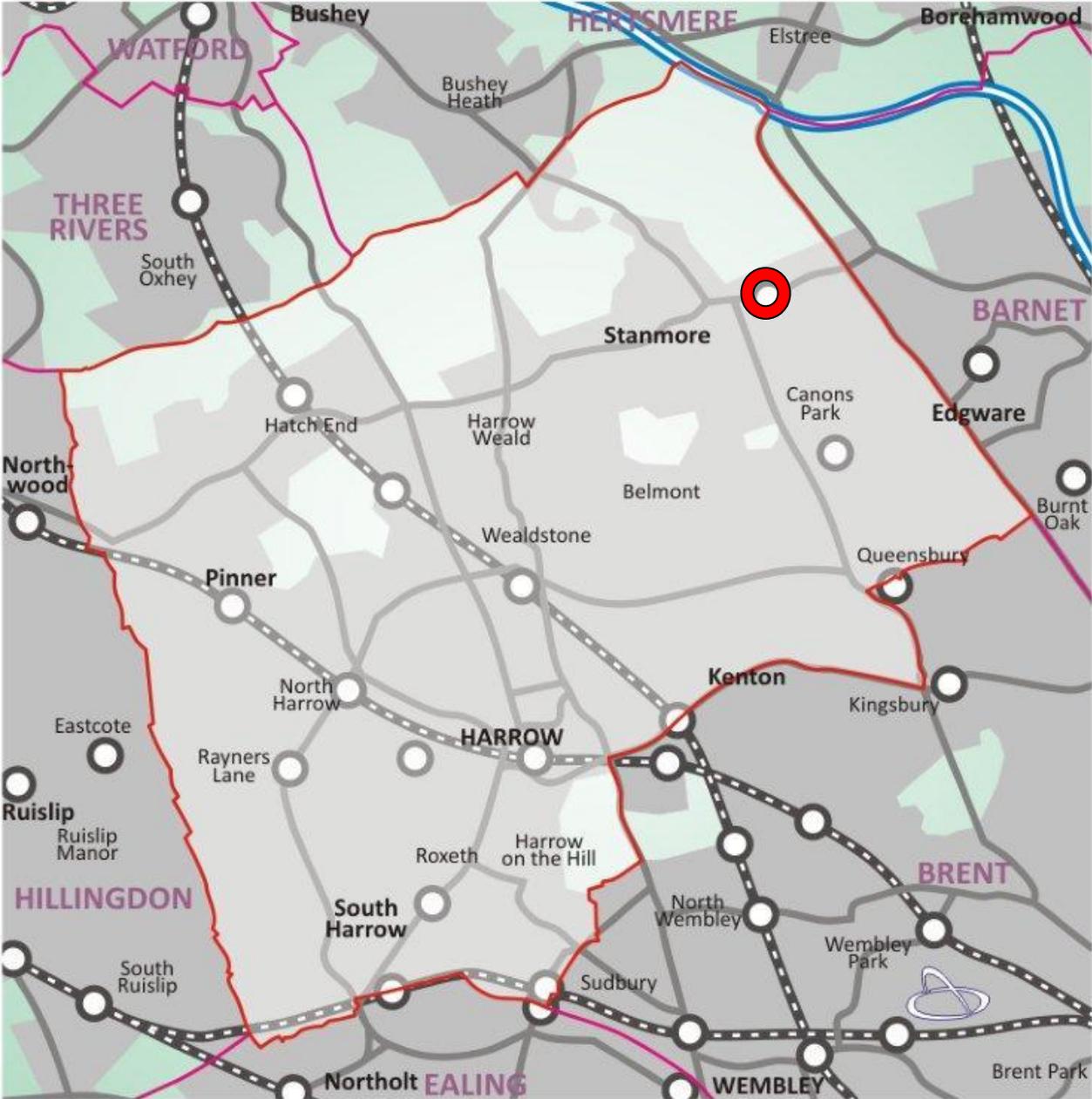


 = application site



Stanmore Station Car Park, London Road, Stanmore	P/1221/20
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**LONDON BOROUGH OF HARROW
PLANNING COMMITTEE**

28th July 2021

APPLICATION NUMBER: P/1221/20
VALID DATE: 19th MAY 2020
LOCATION: STANMORE STATION CAR PARK, LONDON ROAD,
STANMORE
WARD: CANONS
POSTCODE: HA7 4PD
APPLICANT: CATALYST HOUSING LIMITED AND TRANSPORT FOR
LONDON (TfL)
AGENT: CBRE LTD
CASE OFFICER: NICOLA RANKIN
EXTENDED EXPIRY DATE: 2ND JULY 2020
**AGREED EXTENSION
DATE:** 30.07.2021

PROPOSAL

Redevelopment of existing public car park to provide new residential accommodation (Use Class C3), commercial floorspace at ground floor and flexible ground floor space.
Development of a public car park along with associated works.

RECOMMENDATION

The Planning Committee is asked to **REFUSE** planning permission for the following reasons:

1. The proposed building A, by reason of its siting and scale, bulk, design and height would give rise to significant harm to the open setting and character of Kerry Park Avenue Conservation Area and adjacent Locally Listed Station building. The overall public benefits of the scheme, including an insufficient level of genuinely affordable housing in line with affordability levels of local borough residents and an excessive level of shared ownership product, contrary to the boroughs housing needs, does not on balance outweigh the harm identified. In the absence of clear and convincing justification in terms of overall public the proposal is contrary to the National Planning Policy Framework (2019), policies D3 D (1),(11), D9 C (d) and HC1 C of the London Plan (2021), policy CS 1 B and D of the Harrow Core Strategy (2012), Policy DM 7 of the Harrow Development Management Polices Local Plan (2013) and the Kerry Avenue Conservation Area Appraisal and Management Strategy (2013).

2. The proposed development, by reason of direct loss to SINC land and insufficient mitigation measures would cause harm to the biodiversity value of the site and surrounding area. The harm identified, in the absence of any biodiversity compensation, fails to demonstrate that biodiversity value of the site and surrounding area would not be harmed, protected or enhanced, contrary to the National Planning Policy Framework (2019), policies G5 and G6 C and D of the London Plan (2021) policy CS 1 E of the Harrow Core Strategy and policies DM 20 and DM 21 of the Harrow Development Management Policies Local Plan (2013).
3. The proposed development, by reason of the siting of buildings C and D together with their height bulk and scale and their relationship with the residential dwellings No's 12-30 of Westbere Drive, would give rise to an unneighbourly, overly dominant and overbearing form of development, to the detriment of the residential and visual amenities of the neighbouring occupiers, contrary to the National Planning Policy Framework (2019), policy D3 D (1), (7) of the London Plan (2021), policy DM 1 of the Harrow Development Management Policies Local Plan (2013), the Mayoral Housing Supplementary Planning Guidance (2016) and Residential Design Guide Supplementary Planning Document (2010).

REASON FOR THE RECOMMENDATIONS

The Stanmore Station Car Park is allocated for residential development with the retention of appropriate station car parking, under Site H10 in the Local Plan. The provision of housing on the site is consistent with the Development Plan's broader objective to meet development needs on previously developed land, and to do so in sustainable locations, without resorting to development on greenfield and garden land.

The proposal would deliver 277 units of housing, all of which would be affordable-tenure. The proposal would therefore contribute to the achievement of local policies, the strategic level need for new (affordable) homes for London and the Government's policy objective of boosting significantly the supply of homes. However, the proposal clearly offers an affordable housing offer that is weighted heavily to a tenure that there is not a substantial need for, being Shared Ownership. By reason of this, it results in a much lower quantum of London Affordable Rent, which there is an evidenced need for, and which offers much more in terms of alleviating homelessness within Harrow and wider London. Notwithstanding the imbalance in tenure, it is also noted that a significant number of the Shared Ownership units (2bed and above), would not be affordable to Harrow residents, when compared to the Harrow average household incomes. Therefore, the additional affordable housing offer beyond the policy compliant level is given limited weight.

The proposal has been conceived through a design-led approach that has sought to optimise development on this accessible, brownfield site. Officers recognise the proposal would introduce a development of contrasting scale and height that would contribute to a change in townscape character. For the most part the proposed development would

achieve a high standard of design and layout and would deliver an inclusive, attractive, well-designed and accessible public realm that supports the objectives of lifetime neighbourhoods. Notwithstanding this, It is considered that the proposal fails to have sufficient regard to its surrounding context, in respect of the lower scale two storey residential properties to the west, specifically in relation to blocks C and D, as well as the Kerry Avenue Conservation Area and Locally Listed Station.

It is considered the proposed blocks would give rise to an overly dominant and overbearing scale and massing in relation to the two storey residential properties in Westbere Drive. With regard to designated heritage assets, the combination of the height, design and siting of Building A would cause significant harm to the setting of the conservation area and locally listed station for which clear and convincing justification has not been provided contrary to the NPPF requirements. When the identified harm is weighed against the outlined public benefits of the scheme (including delivery of 277 affordable housing units, step free access to Stanmore Station, new landscape public realm, biodiversity management plan delivery of a cycle hub and high quality design) officers consider that the benefits would not outweigh the harm, contrary to paragraph 196 of the NPPF

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

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

In respect of biodiversity impacts, the proposal will result in the direct loss of SINC land for which compensation is required. With reference to Paragraph 175 of the NPPF the harm resulting from the development will not be adequately mitigated under the proposals as presented and is therefore considered to be unacceptable in this regard.

For all these reasons, the material considerations and benefits in favour of the proposal would not outweigh the identified harm discussed above. In accordance with the NPPF,

including its presumption in favour of sustainable development, officers recommend that the planning application should be refused.

INFORMATION

This application is reported to Planning Committee at the request of the Interim Chief Planning Officer, given the significant public interest in this application.

Statutory Return Type:	Largescale Major Dwelling Development
Council Interest:	n/a
Net Additional Floorspace:	10,577m ²
GLA Community Infrastructure Levy (CIL):	£419,100
Local CIL requirement:	£23,100

HUMAN RIGHTS ACT

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

EQUALITIES

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

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

S17 Crime & Disorder Act

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

1.0 SITE DESCRIPTION

- 1.1 The application site is located adjacent to Stanmore Station, London Road, Stanmore. It is 2.68-hectare linear site, oriented north south. It is located to the south of London Road and is currently predominately used as a 446 space commuter car park serving Stanmore Underground Station. The site also contains a Borough Grade II SINC (Site of Importance for Nature Conservation) woodland, known as Canon's Park and Stanmore Railway Embankments SINC at the southern end. The northern end of the site is green space containing mature trees and vegetation adjacent to Stanmore Station and is also partly used for vehicle parking.
- 1.2 The eastern site boundary adjoins the residential gardens of the two storey terraced properties fronting Westbere Drive. Towards the front eastern boundary is a three-storey block of flats fronting London Road (No. 85).
- 1.3 The SINC wraps around the southern end of the site and continues along the western edge of the Jubilee Line London Underground tracks. The SINC incorporates Canons Park and provides part of a strategically important Green Corridor connecting part of the chain of important sites at the northern end of the borough with more residential and more heavily urbanised sections. There are also a number of Tree Preservation Order Groups (A1) located beyond the south eastern boundary of the site
- 1.4 Beyond the south eastern boundary of the site is Aylwards Primary School and the two storey detached dwellinghouses of Dalkeith Grove.
- 1.5 Directly to the west of the site is the Jubilee London Underground tracks and further beyond this is the two-storey semi-detached dwellinghouses of Merrion Avenue. Towards the northern end of Merrion Avenue and siting on the other side of Stanmore Station is a recently constructed mixed use development (The Landsby) comprising of 70 C3 residential units and 101 C2 assisted/independent living units in two building blocks rising from three to a maximum of 8 storeys at the northern end.
- 1.6 There is a significant level change across the site of approximately 8 metres from the northern London Road end to the southern end of the site towards the SINC. The existing car park site approximately at track level and a ramp facilitates the level difference from London Road.
- 1.7 The site is located in a predominantly residential area with the exception of the adjacent Stanmore London Underground Station. Stanmore District Centre is located approximately 450 metres to the west of the site and contains a number of local shops and services. With the exception of the Landsby building, the prevailing building heights in the immediate area are two to three storeys. London Road to the north of the application site is main distributor road and there are some larger blocks of flats on the approach to Stanmore town centre between approximately four and seven storeys.

- 1.8 There are no listed buildings on the site and the site itself is not located within a Conservation Area. However, the site lies directly within the setting of the Kerry Avenue Conservation Area which is situated to the north and west and includes the 1.5 storey high locally listed Stanmore Station. The Kerry Avenue Conservation Area Appraisal and Management Strategy outlines the special interest relates to its unusual concentration of the modern or internal style idiom demonstrated in its collection of intern was and post war houses which are on the whole well preserved in terms of the original fabric, details and layout. It notes that the continuity of building style, type and materials, while maintaining individuality, is central to the area's character.
- 1.9 The site is allocated within the Site Allocations Local Plan (site H10) for 44 homes and retention of adequate car parking provision.
- 1.10 The location is rated as PTAL 4 due to the presence of the Underground station and bus interchange. The area surrounding the station is rated 3 and this drops to 2 and eventually 0 further away.
- 1.11 There are a number of Controlled Parking Zones (CPZ's) around Stanmore Station (zones B, H and HB). The site is situated within CPZ HB with fours of restriction in operation at anytime.

2.0 PROPOSAL

- 2.1 Full planning permission is sought for the redevelopment of the application site to provide to provide new residential accommodation (Use Class C3) of 277 units, across seven buildings between six and eleven storeys and nineteen three storey townhouses together with provision of flexible commercial ground floorspace in Building A to be used for a range of uses under class E including shops, professional services and café use (formally classes A1/A2/A3) along with a TfL Cycle Hub (Use Class Sui Generis) and the re-provision of a 300 space public car park along with associated access, 8 residential wheelchair accessible car parking spaces, cycle parking, public realm works and landscaping.

Housing

- 2.2 The application proposes 277 residential units, all of which are proposed as affordable homes. 68 units will be provided as London Affordable Rented units (35%) and 209 units will be provided as Shared Ownership (65%).
- 2.3 The proposed mix will consist of:
- 95 x 1B 2P
 - 18 x 2B 3P
 - 123 x 2B 4P
 - 29 x 3B 5P
 - 12 x 4B 6P

- 2.4 The development includes 10% wheelchair user dwellings which will be to M4 (3) standard and will be fully adapted on the delivery of the scheme. All apartments, other than the wheelchair units are designed to be Accessible and Adaptable Dwelling standards M4 (2).

Layout and Height

- 2.5 The proposal consists of three groups of buildings, providing in total 7 standalone residential buildings between six and eleven storeys in height as well as the provision of 19 three storey townhouses.
- 2.6 The proposed residential blocks are proposed in three distinguished character areas. Buildings A to D comprise the urban mansion blocks and station buildings, houses E1 and E2 comprise the terraced street and buildings F to H form the woodland Villas at the southern end of the site.
- 2.7 The site is 2.68 Ha (including the SINC, resulting in a density of 103 units/hectare or 319 habitable rooms per hectare.
- 2.8 Proposed building A would be located at the north end of site closest to Stanmore Station. It would be located next to the new station arrival space to the west and next to the entry point from the site to London Road. To the south the building would be linked to building B through a single storey podium housing the below ground car park entrance and the TFL cycle Hub. Building A would be the tallest building at 11 storeys and would contain 50 shared ownership units.
- 2.9 Two flexible commercial space are proposed on the ground floor of building A (Classes E(a), E(b) and E(c). The north western commercial space would be 80sqm and the north eastern commercial space would be 124sqm.
- 2.10 Building B is located to the south of Building A. Proposed building B sits on top of the car park podium and is bounded by a 2-metre maintenance zone and the siding to the west and by the proposed new street to the east. Building B would be 7 storeys and would contain 33 Affordable Rent Units.
- 2.11 Buildings C and D are located to the south of Building B on top of the car park podium facing the new street. The building typology repeats twice, with green space in the form of pocket parks located between buildings. Building B and C would both be six storeys in height. Blocks C and D would each provide 50 Shared Ownership units.
- 2.12 Three storey townhouses E1 and E2 are proposed towards the middle of the site where it is most narrow, and the properties of Westbere Drive are closest. Seven, three storey E1 houses address the first part of the street on the western side. These houses would have a narrow typology and would be provided as shared ownership units.
- 2.13 Further south, house type E2, a wider housing typology lines both sides of the street. A total of 12 E2 houses are proposed and would be provided as London Affordable rented units.

- 2.14 The rear garden of the eastern row of houses face the SINC, whilst the rear gardens of the western houses would be bounded by a 1.2 metre maintenance strip and the track sidings.
- 2.15 Proposed buildings F and G would be located at the southern end of the site adjacent to the SINC. The buildings are angled in relation to each other adjacent to a new planting area. The proposed buildings would be six storeys high. Building F would contain 23 Shared Ownership units and building G would provide 26 Shared Ownership units.
- 2.16 Proposed building H is the most southern building and would be located at the end of the site adjacent to the SINC woodland. Building H would be 10 storeys high and would be sited to the rear of a new planted public realm area. Building H would contain 36 Shared Ownership units.
- 2.17 Part of the footprint of the townhouses to the west and building E, G and H would encroach directly on the SINC land.

Parking, Cycle Parking and Access

- 2.18 The proposed basement level car park will provide 300 spaces for public use, which will include 12 public accessible bays to retain the existing provision. The proposed level of electric vehicle charging will include 6% active and 6% passive.
- 2.19 Access to the station car park at Stanmore station will be provided via a ramp on the alignment of the existing access.
- 2.20 The proposed residential development will be car free with the exception of accessible parking bays provided in accordance with the London Plan:
- 3% active accessible parking bay provision and
 - 7% passive accessible parking bay provision
- 2.21 The residential accessible parking would be provided externally, separate from the basement level car park. The proposals for residential parking include 8 bays for active provision and an additional 18 bays for passive provision if required, which would be provided externally.
- 2.22 The proposals include improvements to the existing site access arrangements, with the provision of a formal priority junction arrangement at the site access, including providing a corner radius on the east corner at the junction with London Road.
- 2.23 The proposals will extend the footway along the south edge of London Road and include a raised carriageway in the site access to provide a continuous footway
- 2.24 The proposals include a site access road which will extend which will extend between London Road to the north and proposed building H at the south of the site, running the full length of the site. The site access road will be lightly trafficked at the southern end, only providing vehicle access for residents with

accessible parking bays on site and for the delivery and servicing vehicles. The site access road will provide access to the basement public car park, the access to which is provided beneath building A at the north end of the site.

- 2.25 The proposed access road carriageway would vary along the length of the road to reflect the varying use of the road and to maximise opportunities for Landscaping. The north section of the access road carriageway would be 5.5 metres in width between the junction with London Road and the access to the basement car park. The access way carriageway reduces between the junction with London Road and the south end of the site, between 4.1 and 4.8 metres.
- 2.26 The proposals include the provision of a single car club bay on site which would be provided within the basement car park.
- 2.27 Secure cycle parking will be provided for residents at ground floor level in each residential building. The proposed long stay cycle parking will be provided in the form of two-tier cycle parking and Sheffield stands within secure rooms. A total of 510 long stay cycle parking spaces will be provided. The development proposals also include the provision of 23 short stay cycle parking spaces across the site.
- 2.28 The development proposals include a TFL cycle hub in building A for Station users, providing a secure and sheltered area for cyclists to store their cycles located at the north end of the site. The TFL cycle Hub currently shows 128 spaces in the form of two-tiered cycle racks and some Sheffield stands. The design is subject to further review by TFL.
- 2.29 The proposals will include a new step free access to Stanmore Station provided via a lift arrangement within building A.

Landscaping and Public Realm

- 2.30 The proposed landscaping and public realm strategy consists of six key landscape character areas. There is a series of outdoor community gardens proposed across the site as playspace to a total of 1,516sqm
- 2.31 The proposals will provide a landscaped area of public realm adjacent to Stanmore Station to enhance the locally listed building and create a link to the adjacent Conservation Area
- 2.32 Streetscape improvements are proposed along London Road to continue to the tree lined character of London Road including incidental play.
- 2.33 A new street is proposed within the development, designed to follow the principles of healthy streets
- 2.34 A planting buffer is proposed surrounding the site
- 2.35 A wildlife garden located at the southern end provides natural play elements and habitat structures to provide a space for children to play.

3.0 RELEVANT PLANNING HISTORY

P/4365/19 EIA Screening Opinion to determine whether an Environmental Impact Assessment is required for up to 300 residential units; up to 350 sqm of flexible non-residential floorspace (A1/A3/B1/D1) and public car park
Environmental Impact Assessment not required Decision 29/10/2019

4.0 CONSULTATION

- 4.1 A total of 2,887 consultation letters were sent to neighbouring properties regarding this application. The letters were sent on Tuesday 9th June 2020 and residents were provided with a minimum 6 week period of consultation in which to provide a response.
- 4.2 A total of 10 site notices were placed adjacent to the application site, including the main entrances to the Station Car Park, the Underground Station and the Kerry Avenue Conservation Area on 11th June 2020. The application was also advertised in the local press on 11th June 2020. The application was advertised as a major development, Impact on Setting of a Conservation Area, Impact on Setting of a Listed building and a Departure from the Development Plan.
- 4.3 A total of 1099 neighbour representations have been received. Of these, 1079 have raised an objection to the application, 10 have provided support for the proposal and 10 are submitted as general comments. A summary of the responses received are set out below. All material planning/relevant matters have been addressed within report. Other matters raised are not material planning considerations/not relevant to the proposed development.
- 4.4 Furthermore, a petition comprising 2,285 signatures has been submitted in objection to the proposal. The petition has been submitted on the basis that the:
1. The development will cause a steep increase in traffic along London Road both during construction and after completion.
 2. The traffic congestion and increased levels of exhaust and noise pollution created by the development will worsen air quality and should be a serious concern for everyone living in the area.
 3. Step-free access to Stanmore Station will be through a lift inside one of the tower blocks, far from the actual station platforms. This is a clear failure to provide proper access within the station building for those with restricted mobility.
 4. There are no plans in place to increase the local infrastructure and amenities, including nurseries, schools and healthcare centres, to cope with the sudden increase in residents.
 5. The development does not provide any parking for its residents, so the hundreds of new families living there will be forced to park on surrounding streets, leading to chaotic scenes and a huge deficit in available spaces.
 6. As the first stop on the Jubilee Line, Stanmore Station is the main hub for people traveling into London by Public Transport. The drastic cut in the

number of parking spaces will force commuters to drive into London, adding traffic and congestion.

Summary of Comments on original consultation

Character and Design

Out of character; scale and height unprecedented; overbearing; Tower block an eyesore; No architectural merit; Similar development in North Finchley a blot on the landscape; Dominate suburban views; Inappropriate size and scale; overdevelopment; blight on the landscape; out of keeping; high density; over-intensive use; out of character with suburban style homes; bulky; obtrusive; precedent for future height of development; dominating; invasive development; uninspiring building; unappealing design with zero character; people pay high prices and enjoy living here due to suburban feel of the area; undesirable use of land; incongruous to area; high rise buildings taking over place of housing; losing character of neighbourhood; Unacceptable density; Stanmore and canons park being inundated with buildings of flats; over-subscribed with apartment buildings; out of keeping with surrounding 1930s estate; will dwarf other properties; inner city building design in suburban area; intrude on the skyline; prison like; development should fit-in with the local area; design is bland; The village like area of Stanmore will be lost; The scheme does not reinforce identity, legibility, permeability or inclusivity; proposal creates final blocking of the views to and across the railway given existence of the Landsby building; Breach of London Tall buildings policy; Landsby building already too big this will make impacts worse

Heritage / Canons Park

Building would harm the Kerry Avenue Conservation Area and Locally Listed Station; Tall buildings will dominate views out of the conservation area; proposal overlooks the conservation area; destroy views of locally listed station; 11 storeys is overbearing on the conservation area; Will result in loss of key views; Building is inappropriate and excessive on the conservation area; Landsby development made efforts to match the Art Deco feel; No consideration to archaeology despite closeness to Old Roman Road

Residential Amenity

Neighbouring Occupiers

Loss of daylight and sunlight; noise and disturbances to existing residents; blight outlook; noise and disruption during construction; not enough amenity space; health and safety at risk with pollution and traffic; overlooking and height may impinge on privacy; loss of quality of life; loss of privacy; Will impact on nearby residents of the Landsby retirement flats

Future Occupiers

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

amenity space with pocket gardens; There are no large areas for kids to play football and games; where is the outdoor space for the adults?; High rise buildings are major spreaders of disease and infections; cramped conditions or families;

Highways and Transport

Station Car Park

Commuter parking spaces needed; Car park is always at capacity; car park used on match days for Wembley cheaper to park at station and use underground than commute from outside London Underground stations; car parking at station already at capacity; commuter car parking essential for commuters; safer to use car park than public transport at night; outer edge of London so commuters should be parking here and commuting into London; already station car park cannot meet demand; reducing car parking at the start of the Jubilee line, commuters will not be able to commute; will force people to drive into London; once lost the parking spaces will never be replaced; station car parking is also in short supply like affordable housing; how loss of parking spaces will disproportionately affect vulnerable, disabled and frail; how can people use the station if they cannot park cars; need to bear in mind regular service from Stanmore Station to the RNOH; Site allocation requires adequate parking to be assessed first before residential component; inadequate limited parking survey; TA does not consider use by other for access to London; Car park not in ownership of TFL so potential loss of control; Proposed car park in a basement would create threatening and dangerous environment; Car park operator given the ability to advertise as parking for Wembley events; factual inaccuracies in TA

Public/Sustainable Transport

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

Traffic and Parking

Area will be overcrowded with vehicles; more congestion in area; more pressure for parking on side streets; will cause too much traffic; existing residents forced

out due to congestion and parking constraints; area is over-run with cars and living here is a nightmare; battleground for parking; loss of parking permits for local residents; need more parking; reducing spaces will not reduce parking needs; increased volume of traffic; no traffic calming measures established or planned; majority of existing residents have two cars; access to driveways blocked due to existing parking issues; increased traffic will lead to road traffic accidents and delays; no provision for increased traffic on match days; nowhere else for commuters to park and would clog surrounding streets; how will small children be protected from delivery lorries – proposals not safe; The proposed scheme discriminates against disabled people – not enough disabled parking spaces; Waiting to enter the car park will cause major tail backs on London Road; Traffic on London Road will become unbearable during construction; How will an ageing population get about

Car Free Proposal

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

Other

Would be better for a multi-storey car park on the front of the site; speeding drivers; increased likelihood of accidents; vehicle and delivery van location not provided; pressure on road space for deliveries will be intolerable; more on street parking a hazard for emergency vehicles; no one can be sure about the long term consequences for the use of private transport as a result of Covid-19; many large delivery vans parked in the local area at night so would be better for these to be allowed to park in the station car park at night; Lift if built wont be accessible to members of the public; Presumption that the development is brownfield which it is not; proposal will increase crime and anti-social behaviour

Local Infrastructure and Services

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

Housing

Need to build more houses with gardens; Harrow could release other brownfield sites or green belt; already enough flats and houses; affordable housing should also include houses and not just flats; flats will be bought and let out and be over-occupied; no new housing is needed; housing not the only important factor; bigger plots are available to build rather than a cramped and dense

development; should focus on abandoned buildings and unused land; affordable housing to who?; new houses should be built outside borough; properties built are not affordable housing; most units are shared ownership the contracts of which are notoriously burdensome; Only 44 new homes were stated in the local plan for the site. The development would be 11% of the mayor's target of 10,000 dwellings on TFL sites

Environment, Sustainability and Ecology

Increased pollution; water supplies are stretched; pollution will impact health;; destroying environment by building too much; loss of wildlife; impact on drainage; removal of trees; increased risk of flooding; loss of trees and natural habitats will endanger the sensitivity of the site; noise and air quality due to road congestion will endanger the health of local residents.

Other

Will increase crime and antisocial behaviour; Harrow is being overpopulated; will not benefit people of Harrow; negative impact on property value; put Harrow residents first before greedy profit; majority of people in locality against the development; money grabbing venture; access for construction traffic will be difficult; building could cause damage to adjacent buildings and railway line; impact on subsidence to surrounding properties; risk of fire; will aggravate rather than enhance social cohesion; TfL losing asset that generates regular revenue for one-off benefit; increase in population will require more employment in locality and hobs for all the new residents; development serves commercial and not community interests; gentrify other places outside London; public land should not be sold off; hooligans loitering around station on Wembley event days; The lift doesn't go to the station; The step free lift will be some distance from the platform; the scheme will not generate local jobs for Harrow which is a requirement of the local plan; It is not known who will own the lift or maintain it; Site allocation requires two accesses to station-breach of policy;

Processes

Clear Breach of planning polices; The Harrow web site was not available for logging comment during some of the consultation period; The designing out crime report was not made available to the public; Incorrect facts and no justification for the changing demographics in the locality

Support

Will provide much needed affordable housing, reduced parking will lead to less congestion, appropriate as more people work from home due to Covid-19

4.5 Statutory and Non-Statutory Consultation

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

Consultee and Summary of Comments

LBH Planning Policy:

- The proposed development would provide a comprehensive re-development of the site, which is acceptable in principle and welcomed.
- The proposal clearly offers affordable housing offer that is weighted heavily to a tenure that there is not a substantial need for, being Shared ownership. By reason of this, it results in a much lower quantum of London Affordable Rent, which there is an evidenced need for, and which offers much more in terms of alleviating homelessness within harrow and wider London.
- It is also noted that a significant number of the Shared Ownership units (2bed and above), would not be affordable to Harrow residents, when compared to the Harrow average household incomes.
- By reason of the above, the weight that can be afforded to the 100% affordable housing offer in the broader planning balance is reduced by the fact that the 'additional' affordable housing offer above that required by Harrow's Local Plan is of a tenure for which there is a lower identified need for.

Energy and Sustainability

- No Objection - The energy and sustainability matters have been adequately addressed and additional information required can be secured through condition and section 106 agreement.

LBH Conservation Officer

- Objection - The combination of the height, design and siting of Building A would cause significant harm to the setting of the conservation area for which clear and convincing justification has not been provided contrary to the NPPF requirements.
- The harm would be caused to the open character and setting of the conservation area which is an integral part of its special character and appearance of the area as an early domestic group of Modernist Metroland built on the Garden Suburb principle and thus intended to be quite separate and semi-rural in character with open views out all around, compared to more built up areas.
- Similarly, its dominance would undermine the landmark quality of the station. Landscaping would not respond sufficiently to that which characterises the conservation area. Siting and scale would not respond to the symmetry of built form of the conservation area, nor the successes of the building in the opposite equivalent site of the station in preserving the open setting and high-quality design of the conservation area.

LBH Highways

- In terms of highways impact, the proposed development is expected to result in a reduction in car trips and an increase in trips by other modes.
- The principle of a residential development is feasible for this site however a large scale, car free scheme combined with a reduction in public car parking is considered unsuitable for the location as it is likely to result in

harm for the surrounding highway network due to insufficient mitigation measures.

- Highways consider that in policy terms, we are not in a strong enough position to defend an objection as the level of mitigation already agreed to deal with potential parking issues should be sufficient.
- In order to address the concerns, further mitigation in the form of measures to enable sustainable travel need to be increased and suggest that improvements to the corridor between the site and through Stanmore town centre could be made eg. introduction of a 20mph zone and improved cycling facilities
- This would require a further contribution of £15-20k. Combined with the proposed cycle hub, travel planning measures and alterations to the surrounding CPZ's, this would make the car free proposal and reduction of public car parking acceptable in Highways terms, and so would satisfy the policy requirements.
- The carriageway width remains an issue but this could be addressed through planning condition and further design considerations.
- A point to note; the acceptability of either this scheme or Canons Park really depend on both having a similar outcome. The potential impacts in Highways terms may increase should one site receive approval and the other not as problems may transfer from one site to the other and without funding for mitigation, it would be difficult to address any issues.

LBH Travel Planner

Surveys thereafter will be conducted on the anniversary of the initial baseline survey. Travel Plan Coordinator (TPC) should be in place at least 2 months prior to occupation. Use of ONS or TRICS data should be used to estimate targets for Travel Plan. The Travel Plan should commit to predicting targets for the life of the travel plan. Targets can be changed and agreed in year 3. Please update the Travel Plan. Targets to be agreed within 2 months of baseline survey. Surveys should be compulsory for residents. TPC to be in place at least 2 months prior to occupation. Details of TPC should be provided to Harrow Council Travelplanning@harrow.gov.uk

Cycle hire scheme could be considered for better connectivity to town centres. Commit to investigating incentives through operators such as discount for residents and workers in the commercial unit.

There are good measures included. We would like to see the following measures/ additions included. If they can't be included, please let us know why:

- Make all printed material to be made available electronically
- Commitment to providing adult cycle training (this is listed but under 'promoting cyclist and pedestrian training) Please include separately as it will be clear you aim to provide/support cycle training for all residents
- A link to Harrow Council's website, which will have details of local events such as the Harrow marathon

Action Plan

Residential Travel Pack – Copy to be submitted to Harrow Council for approval prior to occupation. Please update in Travel Plan.

Monitoring and Review

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

Travel Plan monitoring fees to be secured by agreement. Amount to be detailed by agreement.

In the event the Travel Plan is unable to meet targets, a remedial sum will be used to cover the cost of additional measures to support the achievement of targets. Remedial sum to be secured by agreement.

Additional

There is not enough information contained within the Travel Plan regarding the commercial element. Please include how you are going to promote sustainable travel to and from this section of the development.

LBH Drainage Engineer: No objection subject to conditions relating to surface water storage and attenuation and disposal of sewage.

LBH Housing Enabling

- In terms of the policy compliant 40% element of the scheme, the 302 London Affordable Rent habitable rooms represent 88% of the policy compliant offer (61% by unit), which is acceptable. However, overall this scheme proposes 65% shared ownership by habitable room (75% by unit) and comments on this are given below. Regarding, bed size mix of the policy compliant element, the provision of 2b4p, 3b5p and 4b6p London Affordable Rent units for family housing is acceptable.
- Subject to the comment above regarding the provision of London Affordable Rent wheelchair adapted homes, the policy compliant element of this scheme is supported by Housing.
- However, whilst the scheme provides 100% affordable housing, the applicant acknowledges that Harrow has a small housing stock and very high demand for housing from homeless households, home seekers and tenants waiting for alternative accommodation (i.e those in need of rented social housing). It is therefore regrettable that additional London Affordable Rent homes are not proposed, over and above those within the 40% policy compliant element, as this tenure is in high demand in Harrow to meet priority housing need, particularly now, in the light of the current and forecast adverse effects of Covid-19 on homelessness and unemployment which is increasing demand for London Affordable Rent homes.

LBH Environmental Health

- Concerns have been raised that the proposals in the noise report state that there will still be exceedances of up to 9dB. Given that an increase of 10dB

is equivalent to a doubling in loudness, a 9dB increase would be considered unacceptable. The report also states that during the night-time (2300 – 0700) the noise from the trains regularly exceeded 70dB after cleansing the data. Even with mechanical ventilation it is reasonable to suggest that the occupants would have their windows open which would negate the acoustic performance of the glazing and building structure.

- The noise report included with the submission mentions the close proximity of the railway and sidings to residential premises, and the possible noise issues that arise from these operations. It has suggested the use of non-openable windows to the affected elevations with trickle vents or HVAC units to those elevations that look out onto these.
- Because of the close proximity of the tube station (mainly doors opening & closing, station announcements) and associated sidings, future occupiers of the scheme are likely to be subject to unacceptable levels of noise, with the potential for noise complaints. Bearing in mind that in case law there is no defence to a nuisance claim for “coming to the nuisance” (see *Coventry v Lawrence* - 2014) This would place the proposed occupants in a climate that would unduly affect their quality of life, and may possibly result in action against TFL, even though TFL is in law a statutory undertaker, doesn't mean that they have carte blanche to cause noise nuisance and recompense may be found in the Civil courts.
- EH accept the findings of both the noise and vibration assessments, but would recommend conditions on the commercial uses there so that any A3 uses would need to individually apply for ventilation/extract permission (noise & odour) so as not to unduly affect existing and proposed occupants/residents. A restriction in deliveries/collections would also be necessary.
- If the committee are minded to approve the development then I would ask that they consider the following conditions:
 - Further detailed noise measures for the protection of future occupiers.
 - No flooding lighting or other forms of external lighting shall be installed unless in accordance with the details previously submitted.
 - A scheme to deal with contamination to be provided prior to commencement.
 - A scheme for the control of noise and odour relating to the commercial aspects of the scheme.
 - Restriction on the hours of use for the commercial elements
 - Restriction on the hours for deliveries and servicing.

LBH Design Officer

Context & Vision

Generally, the approach to the development of this site is sensitively undertaken in terms of materiality and massing of the masterplan, as well as incorporation and celebration of the SINC and railway condition.

- There is limited success in addressing neighbouring residential contexts, one success being the incorporation of town houses for the middle portion of the site. However limited response to the Kerry Avenue Conservation

Area and other residential properties such as those on Westbere Drive is provided.

Site Strategy & Masterplan

- The proposal incorporates strong principles regarding site connectivity, access and integration (10 healthy streets indicators incorporated) throughout length of the site. The site strategy proposes rich and successfully cohesive character areas which have regard for most boundary conditions, notably the SINC.

Public Realm & Landscape

- Landscaping and increased tree provision incorporating play results in a biodiverse and materially rich public realm which recognises the SINC and encourages site porosity, integrating blocks F, G, H into the wider landscape and softening their mass.
- Greater detail of play spaces and strategies for the public realm and amenity areas is encouraged. There is concern as to the western boundary condition for certain buildings which directly front tracks. A buffer element should be incorporated.

Built Form, Scale & Massing

- The proposed number of storeys and overall massing of building A are excessive for its site context and relationship to neighbouring buildings. The siting of building A should bear a relationship to Stanmore Station and the Landsby development. There should be a cohesive visual impact in terms of massing for this northern elevation which includes station and wider public realm. High quality materiality does not excuse a relatively poor form which makes little allowance and consideration for Stanmore Station or neighbouring properties on Westbere Drive.
- Tall buildings and intensification are appropriate for major transport nodes; however any approach must take into account the unique character of such a node. Whilst a building of this height is suitable for a major town centre station such as Harrow it has limited and at present negative suitability for a site adjacent to the Stanmore Station forecourt. Whilst a building of height is welcome for this part of the site, eleven storeys is inappropriately tall and will cause harm to local character. An appropriate massing for this building would be for an eight storey block.
- Block H at the rear of site is successful as a tall building of ten storeys. Mature canopy cover to blocks F, G, H assist in softening the visual impact of these blocks from the surrounding area.
- The rising of the site to its northern boundary with London Road compounds the visual impact of building A and whilst it is sited further from Stanmore Station than the Landsby development by a factor of 2.3 it has the greater impact, with no built form mediating between.

- Whilst I do not believe that building A should compromise its architectural form in response to its setting, it surely must compromise its massing. The building is not of sufficient architectural character to match its prominence or to enhance its setting.

Orientation, Aspect & Internal Layout

- General arrangements are well considered, with inset corner balconies highly welcomed, giving increased spatial and lighting quality to apartments.
- Spacing between blocks and townhouses are adequate and townhouse design is well considered, as are apartment layouts.
- There is strong concern regarding overlooking and impact from buildings C and D to rear gardens and properties at west of Westbere Drive. A clear strategy for mitigation to include additional planting or other massing measures which can significantly reduce this impact is required.
-
- The boundary condition to the railway lines for buildings B, C and D should incorporate a buffer element either through planting or other softening treatment.

Architectural Form, Composition & Materiality

- To building A, the vertical and horizontal brickwork is highly successful in creating a rich texture to the façade. However recessed stacked corner balconies have limited success within the elevation
- The western elevation of building A is less successful than the northern, which has a successful dual angle elevation, mitigating its flank massing.
- The proposed elevational composition does not succeed in fully expressing the building frame through a successful gridded facade, as has been achieved at Kings Crescent Estate.
- Inset elements and the concrete material chosen for these have limited success. There is a weak rationale for this choice of material. The paired two-storey inset for the top floors emphasises the building height as opposed to lightening the form.
- The previous design's (Jan 2020) façade materiality had a warmer hue which had greater bearing to Stanmore station and local domestic typologies.
-
- Buildings B, C and D have high quality brick and metalwork treatments, with a particularly rich quality to entrance vestibules which befit mansion block typologies.
-
- Blocks D-C and F-H have grouped balustrade colours, it would be useful to understand the rationale behind this and whether it is to distinguish blocks of the same character.

Sustainability & Environmental Considerations

- The increase and continuation of the SINC within the development is highly

welcomed as is the step-free access to Stanmore station provided through building A which will have wider benefit to local users.

Harrow Council Building Control

In reference to the Mayors Plan Policies D5 & D12 the following concerns are raised:

- The document provides no declaration of compliance for either Policy D5 or D12
- The document fails to demonstrate a higher level of fire safety than the Building Regulations.
- There is no evidence to substantiate the authors competence.
- The document references evacuation lifts but does not seek to demonstrate compliance with Policy D5 or how this will be implemented on the project.
- The document references Fire Brigade access to Blocks E, F & G will be impeded due to engineering works but it is unclear if the blocks will be occupied and the safety of occupants compromised by the lack of Fire Brigade access.
- Commentary on structure and external facades is generic and not site specific.
- The document does not consider the constituent parts of the building and how alterations in the future could affect the fire strategy or demonstrate the Golden Thread of Information.
- The document makes no mention of any future management strategies.

The above does not constitute a check under the Building Regulations for Building Control purposes.

LBH Landscape Officer

- The proposed development site is highly constrained with limited opportunity for meaningful soft landscape.
- The public realm indicative improvements in front of the station do not form part of the planning application, however, the indicative ideas to make substantial improvements with a pedestrian only arrival space on the frontage of the station and the continuation of soft landscape along the London Road and The Landsby should be a serious consideration for this application, and included within the proposed development.
- The new public realm adjacent to the station, although limited is supported and could work well.
- There are concerns in relation to the limited gaps between boundaries and proposed maintenance path – the areas could become messy, overgrown and out of control

- The 'buffer' strip of planting shown on the Landscape Masterplan, which runs along the boundary of the rear gardens of Westbere Drive and the access road into the site is minimal. It is unrealistic planting could be retained and it would not provide any meaningful screening.
- The high wall to the podium, parapet wall and metal railing balustrade, this would be unattractive and dominate the view from the houses in Westbere Drive.
- The Community Garden has the potential to be an attractive space and the high quality promised on the plans must be secured through the planning permission.
- The gardens to the townhouses would be small and overly oppressive, providing poor outlook.
- The proposals will place negative pressure on the SINC including post development pressure for removal of trees.
- The TFL crane requirement will compromise the soft landscape proposals at the southern end of the site.
- Careful selection of trees would be required adjacent to the woodland garden to ensure usability of space is not compromised.
- The play elements should be incorporated within the landscape and if possible be multifunctional – this can be conditioned.
- The landscape masterplan is at a small scale, at 1:500 which makes it difficult to look closely at the detail and take measurements. The landscape strategy provides typical / generalised details which cannot be measured. A masterplan at a scale of at least 1:200, or preferably 1:100 would be much more helpful, together with detailed to scale landscape cross sections explaining the proposed hard and soft landscape detail. Cross sections are required to demonstrate the impact of the proposed development on the neighbouring properties and explain the proposals to provide a soft landscape setting or any necessary green buffer planting, screening or retained existing planting. Some elements such as green roofs, SUDs, rain gardens, bird and bat boxes, landscape management plan and landscape maintenance and so on have brief mention, detailed proposals are missing.
- Well designed, high quality amenity spaces are required, that are landscaped to be useful as well as attractive and endure the constant and intensive use by residents, in all the spaces including the small, intricate spaces. Many of the proposed spaces are minimal, narrow and tight against boundaries, buildings or kerb edges and it is questionable in the constricted space how successful the proposed soft landscape would be.
- High quality hard materials, street furniture, planting, boundary treatments and other elements including biodiversity elements have been proposed. How will this be translated into the actual build? These proposed elements and images are attractive ideas on the drawings, however the proposals need to be practical, robust and realistic and assurance would be required that the proposals will be carried out and implemented, rather than any subsequent value engineering and removal of high quality elements at the detailed design stage.
- Daylight / sunlight analysis details are required in relation to neighbouring amenity spaces and houses and for the proposed development including all the amenity spaces. In particular the communal courtyard gardens, roof

terraces, townhouse gardens and amenity spaces adjacent to the SINC and between the Woodland Villas, taking into account both the shading of the proposed buildings and the existing and proposed trees.

- Encroachment and loss of part of the SINC and the associated habitats is of concern.
- Tree planting – Proposed trees in hard areas should be installed in underground cellular systems to provide adequate volumes of topsoil to support establishment through to maturity, for example systems such as GreenBlue Urban. This would be essential in such tight urban hard surfaced spaces to be sure that the trees have sufficient growing medium to be successful to survive and thrive.
- The information on the proposed hard and soft landscape and palettes is indicative and further details will be required to understand how realistic the landscape proposals are.
- A robust landscape management plan and maintenance plan, including a calendar of operations and tasks must be in place to ensure the ongoing success of the landscape proposals.
- If the Council are minded to approve this application the following hard and soft landscape conditions, including the detail of the standard planning conditions, where noted below, would be required:
 - A scheme for hard and soft landscaping of the development
 - Hard landscape material details
 - Boundary treatment
 - Levels
 - Treatment of invasive plants
 - Implementation and implementation programme for landscaping scheme.
 - Details of landscape management plan and landscape maintenance plan.

LBH Biodiversity Officer:

- Provided necessary measures are agreed to and undertaken in accordance with conditions that will need to be set, it should be possible to remove objections that remain on biodiversity grounds but this will require the applicant to adopt a different approach in relation to the loss of the established SINC woodland and the associated impacts on the green corridor of which it forms part.
Should this not prove possible the scheme should be refused on the grounds of the direct and indirect impacts on the SINC, which will also be impacted by the Canons Park Station car park proposal.
- At present
 - the impacts have not been adequately evaluated or quantified, particularly with regard to the indirect impacts on the adjoining SINC site and role of the green corridor of which it forms part;
 - there is a considerable lack of detail in relation to the landscaping and biodiversity mitigation/enhancement measures;
 - some design elements conflict with the stated positive aspirations in relation to biodiversity
 - evolutions in the design during the pre-application period have tended to increase rather than reduce pressures on the SINC, conflicting with rather than being guided by the mitigation hierarchy;

- there are discrepancies between as well as gaps in the information provided by the various supporting documents
- and it will be important to ensure
- that biodiversity enhancements to be incorporated within the design will be likely to be successful and appropriate to the context of the site, adding value to the SINC area and their linking role
 - the indirect impacts on the SINC are quantified, and mitigated, and additional measures undertaken either within the railside area or other sections so that any scheme that is permitted will result in net gains for the SINC and the species which are dependent on it.
 - The applicants' approaches to net gain and the attempted justification of the loss of an area of land designated for conservation purposes are not accepted. The approach which the applicant should follow instead is
 - Quantify the SINC area to be lost
 - Using either their own land or via some arrangement with another landowner, to make arrangements to permanently provide an area of woodland that will either be of equivalent or greater quality and equivalent or greater value such that the overall increase is between 15 and 20%.
 - Re-run the net gain calculations, so that where wildlife benefits only incidentally (e.g. the wildlife gardens), there will be indirect impacts on retained habitat (e.g. the remnant SINC), or features are provided to meet other obligations, e.g. drainage requirements, these are downgraded or removed from the calculations as appropriate

It will not be acceptable for a net gain approach in which the redevelopment of an identified brownfield site, of little or no existing biodiversity value, and the welcome improvement which this should be expected to bring to justify either the partial loss of a designated wildlife site or the degradation of a site or remnant site that will be subject to ongoing impacts that will inevitably result in a cumulative loss of breeding species and the biodiversity value of the site.

Further comments following additional information submitted from the applicant:

- A more modest development could be built without encroaching directly on the SINC and would be in accordance with the expectations that have been flagged up from the very earliest stages of the development proposal process. Impacts could be duly avoided.
- However, the applicant is keen to pursue a larger scheme. With other constraints on the site which they are being placed ahead of the biodiversity interest, this would result in a loss of SINC designated area and priority habitat, as well as ongoing negative impacts on what remains of the wooded strip alongside the development and, in particular, the role which the existing belt of woodland provides in connecting the local ecological network.
- With reference to Para 175 of the NPPF the harm resulting from the development will not be adequately mitigated under the proposals as presented. Compensation will therefore be required. For the scheme to be acceptable there will need to be an equivalent or greater area of land provided that, within a set time frame would achieve of SINC quality and which would provide like for like or better replacement of the area of

woodland habitat that will be lost. There appear to be opportunities to address this within the immediate vicinity of the development site or potentially elsewhere along the green corridor but the applicant has elected not to pursue these opportunities.

- The applicant is seeking instead to rely on mitigation and enhancement within the development redline, basing their proposals mainly on a biodiversity net gain approach which is flawed in several ways.
- The provision of suitable compensatory habitat in an appropriate location would resolve the main biodiversity issues relating to the proposals, and I would again suggest that the applicant seek opportunities to achieve this.

LBH Arboricultural Officer:

Middlemarch Environmental provided a survey and impact assessment and at the time of writing, with access to the following details:

- Topographical Survey
- Landscape Plan (Townsend)
- Stanmore Landscape & Public Realm Strategy (Townsend)

The landscape proposals provided above contain mostly indicative, illustrative details, with little specific information. Any proposals re: hard and soft landscaping - proposed new trees, species, location, new hard standing, future maintenance / pruning, and so on – will all have potential implications so need to be addressed in any arb impact assessment. At this stage in the application there should be more detailed information

The survey has identified 22 trees to be removed under the proposal, including 11 'B' category and 2 'A' category trees. As per the BS5837 guidelines and as per Middlemarch's comments in their preliminary survey, the retention of A / B category trees on development sites should be prioritised, with amendments to the scheme considered in preference to their removal. This guidance appears to have been largely overlooked

Middlemarch identified 6 trees with high retention value (A category), two of these – T12 and T40, both Oaks, have nevertheless been proposed for removal to facilitate a new build. There appears to be no over-riding justification for this, other than simply and resulting space constraints. The loss of T12 and T40 will have a significant impact. Replacement planting will not mitigate their loss and any new trees will take many years to provide any meaningful benefit. The loss of these two trees is highly regrettable

Tree Impact

Trees within TPO 301 are located further to the east, within the woodland belt – these should not be affected by the development.

Impact on remaining trees is as below:

A total of 22 trees are proposed for removal, including 7 x B retention category and notably, 2 x A retention trees (Oaks T12, T40), both of high retention value, located within the woodland area, and which would fall within the footprint of the new builds proposed in front of the woodland belt.

Middlemarch identified 6 trees with high retention value: two of these, T12 and T40 Oaks, have nevertheless been proposed for removal to allow for construction of a new build. This is hugely disappointing. Where trees of this quality exist on a site, they should inform the design layout, and may not be removed unless there is overriding justification. There seems to be little justification here, other than simply the sheer density of development and the resulting space constraints.

The impact would be significant given their size and prominence – replacement planting would not mitigate and any new trees would take many years to provide meaningful benefit.

E2 Townhouses:

These are proposed adjacent to the portion of SINC woodland which is being retained. The gardens are tiny and likely to be completely dominated by the existing trees within the SINC. This will be exacerbated by the SINC's elevated position. There will be inevitable and almost immediate pressure on these trees from future occupiers, to frequently prune or remove. Such requests may be difficult to resist having already allowed development. The cumulative long term impact on the SINC will be harmful

Villa blocks F/G/H, Woodland Villas

The impact on the SINC and existing trees is unlikely to be limited to those trees requiring actual removal: the constricted space and proximity of the new builds to the SINC: the working space required for excavation, piling, scaffolding, etc – has it been properly considered whether 4m or so space is sufficient for construction whilst adequately protecting nearby SINC.

In addition to the two A grade trees being lost here, how long will it be before the remaining trees come under pressure from occupants, as similarly these gardens will be dominated / shaded by existing trees.

The report considers there to be no major post development pressure concerns – I would argue that in this part of the site it seems almost inevitable

The areas proposed for new planting / amenity spaces – due to the density of development etc – is disproportionate to the level of tree impact and loss of amenity resulting from the development. The new planting proposals – again which are illustrative – show new trees within 4m spaces. The planting precedent shows Birches and Field Maples within 5m of new bocks, even in the photos (ch 10.7) it is clear that these are young trees and will quickly outgrow their location and start encroaching on buildings.

Proposing large species eg Lime – this sounds impressive but unless these are being maintained as Lime pollards, how feasible is this, given the limited space for planting? A principle of 'right tree, right place' needs to be applied.

A site specific arboricultural impact assessment, draft tree protection / method statement, including details / impact of should be required by condition.

Removal / installation of new hard surfaces, including any 'no-dig' hard surfacing within RPA

Location / installation of new services, drainage etc
Details of any level changes or excavation
Details of construction site access, site huts, storage areas, storage of topsoil / spoil etc
Any special construction techniques eg piling
Changes in ground level such as retaining walls, steps
Working space for cranes, scaffolding, plants & access during works
Type and extent of landscape works required within exclusion zones, and the effect of these on root systems
Phasing / sequence of works
Details of arboricultural site minoring / supervision

LBH Waste Officer

Waste strategy is acceptable. No objection

LBH Economic Development

As a major application, Economic Development will be seeking construction employment opportunities on site in line with Policy E11 Skills And Opportunities For All of the London Plan. The following should be secured in any section 106 agreement:

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

LBH Vehicles Crossings Officer

Some concerns with the proposed site access. The current configuration is the existing access blended into the slip road access on London Road which in today's world doesn't really work.

Further concerns raised in relation to stacking of vehicles awaiting entry to site. More detailed information required on how they can resolve this.

Further comments in response to additional information provided by the applicant.

It is considered that 2 way traffic is required having minimum of 5.5m width or some kind of marshalling to prevent traffic backing up on London road.

Do not consider that signage in isolation is the answer. More detailed information required on how they can resolve this.

LBH Lighting Officer

With reference to the planning application P/1221/20, Aecom Limited Lighting Design Report dated March 2020 for the external lighting at the above development, the following points are noted:-

A comprehensive Lighting Design Report has been submitted, including Lighting Masterplan, Technical & Environmental Requirements, Character Areas & Typologies and Luminaire Schedules.

The developer has confirmed the use of numerous luminaires for both functional and aesthetic purposes within designated areas, as indicated on the

proposed Luminaire Schedule

- LED's will be utilised, which will provide improved colour rendering (>80 Ra), primarily at Neutral White (4000K) for functional areas (e.g. street lighting, car park) and Warm White (3000K) for accent and feature lighting (e.g. entrance areas, trees, benches, gardens)
- a total of ?? luminaires will be installed in a post top configuration on ?? x 4m/6m lighting columns. Developer to clarify during final lighting design/drawing layout

Recommended lighting levels for Residential Roads within city and town centres will vary depending on the individual circumstances, including pedestrian and vehicle conflict, traffic flow and environmental zone:-

Range from P1 to P6, (15 Lux Eav/3.0 Lux Emin to 2.0 Lux Eav/0.4 Lux Emin)

Car Parking Areas 20 Lux Eav

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

I would expect Subsidiary Roads within Suburban – Medium District Brightness (E3) or Urban – High District Brightness (E4) to be lit to Classification P3 with an S/P ratio of 1.9 (adjusted in accordance with Table A.7 when utilising LED light source) 5.5 Eav Lux, 1.1 Emin Lux respectively. The developer has indicated a Classification S2 for the primary traffic route, which is higher than usual for residential roads within the borough and will need to be moderated for any public maintained/adoptable areas.

The proposed highway lighting columns and luminaires will have to be substituted for Harrow Council's Lighting Specification equipment, Fabrikat Ltd Standard 6m columns (e.g. not base hinged, unless there is any access issues for a platform vehicle) and Urbis Lighting Ltd Axia One luminaires (incorporating Telensa Ltd CMS NEMA GPS Telecells) respectively within any public maintained areas.

Also, further clarification is required regarding the responsibility for the other proposed external lighting features (e.g. tree, bench, park entrance areas, community garden) as these particular lighting units will NOT be adopted for future maintenance by the Local Authority.

The Developer has confirmed that the design has been undertaken in conjunction with the Institution of Lighting Professionals, Guidance Notes for the Reduction of Light Pollution and indicated that the installation has been

designed to meet the requirements of “BREEAM, New Construction and Communities 2018 (Section Ene 03 – External Lighting Criteria) and (Section SE16 – Light Pollution), which include the recommendation that efficiency is maintained and light pollution must be minimised.

Furthermore, the Developer has also confirmed alternative design guidelines BS EN 12464-2 General Circulation Area at Outdoor Workspaces, CIBSE Outdoor Lighting Guides and SLL Lighting Guide, which are acceptable.

The maximum recommended vertical illuminance into house windows is 10 Ev Lux before curfew and 2 Ev Lux after curfew within Environmental Zone E3.

The Developer has not provided vertical illuminance calculations at a target line in the direction of all properties within the immediate vicinity of properties bordering the development on all sides. However, given the lighting levels and use of flat glass luminaires this should not present any problems.

Additionally, there is the visual impact/daytime appearance of the installation which needs to be considered, ?? x 4m/6m lighting columns should not present an issue with the residential properties in close proximity on new primary traffic route/residential road within the development.

For comparison, the existing street lighting installation in adjacent residential roads already utilises 6m columns, but at a lower road lighting classification level than is proposed for the primary traffic route/residential road and car parking area. Whilst, the existing street lighting installation in London Road utilises 10m columns and is illuminated to traffic route standards.

It should also be acknowledged that any new introduction of lighting in what is currently an unlit, partially lit area will have an initial impact on the location, as it is a change within the environment.

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

Do the car parking area luminaires incorporate any pre-set dimming, say midnight to dawn, which could reduce lighting levels and energy, during this period and also mitigate any adjacent property concerns regarding the higher car park lighting levels when compared to the main public highway access roads?

The wall mounted bulkhead luminaires on the private apartment balconies are manually controlled from each individual property.

Any further opportunity for the reduction of overspill lighting/visual impact by

the use of luminaire baffles/louvres and/or additional screening by trees during landscaping would lessen the impact.

Further comments from lighting officer following additional information submitted by the applicant:

The Developer has confirmed that the road and car park lighting would **NOT** be adopted by Harrow Council, London.

All street furniture will be maintained by Catalyst and they will also retain responsibility for external lighting", I assume "Catalyst", to be the Developers nominated maintenance company?

As there are no future implications for Harrow Council, London then the Developer can essentially illuminate private road and car park areas to their own lighting specification and utilise road lighting classification S2, even if this is higher than the Local Authority would install on a similar road type (e.g. residential)

With regard to pre-occupation conditions for each of the three sites, Stanmore, Canons Park and Rayners Lane Car Parks, apart from confirmation of final technical specification of proposed lighting, lighting control, including operational hours and lighting plan, I assume that this will be for information purposes only, as I have already provided comments on the preliminary lighting proposals for each of these individual locations.

Therefore, I have no further comments regarding these applications.

External Consultees:

Greater London Authority: (Summary):

Principle of development: The development of the site to deliver 277 new affordable housing units, step-free access to the Stanmore London Underground station and substantial net gain in biodiversity outweighs the loss of 7% of SINC and is supported in strategic planning terms.

Affordable housing: The scheme would deliver 100% affordable housing (35% London Affordable Rent: 65% shared ownership), qualifies for the Fast Track Route and is strongly supported.

Heritage and urban design: Broadly supported; any harm caused to the setting of nearby heritage assets would be less than substantial and outweighed by the benefits of the scheme.

Environment: A number of areas relating to the energy strategy need addressing, including overheating, renewables and Be lean savings.

Transport: Consideration should be given to a further reduction of commuter parking and various transport-related plans secured via planning condition or the Section 106 agreement.

Recommendation

That Harrow Council be advised that whilst the principle of development is

supported the application does not yet fully comply with the London Plan and Mayor's intend to publish London Plan for the reasons set out in paragraph 56 of this report. However, the resolution of these issues could lead to the application becoming compliant with the London Plan and Mayor's intend to publish London Plan.

Cadent Gas: No Objection

MOD Safeguarding:

The application site resides in the statutory safeguarding zones surrounding RAF Northolt. In particular, the aerodrome height, technical and birdstrike safeguarding zones surrounding the aerodrome and lies approximately 11km from the centre of the airfield.

The site occupies aerodrome height and technical safeguarding zones. We have no safeguarding concerns with the height of the proposed building. If the plans change or the height of the development was to increase or exceed 91.4m Above Ground Level (AGL) then we must be reconsulted.

Within the birdstrike safeguarding zone, the principal concern of the MOD is with the creation of new habitats which may attract and support populations of large and, or flocking birds hazardous to air traffic. The flat roofs within this proposal have the potential to attract and support hazardous breeding gulls. To prevent gulls from successfully breeding on the roof, full access to all areas of the roofs should be included in the design and a Bird Hazard Management Plan (BHMP) is required. The BHMP should include provision to prevent successful breeding by large gulls on the roof spaces.

This requirement should be applied as a condition of any planning permission granted. In conclusion, provided the maximum build height does not exceed 91.4m AGL and a condition is applied to any consent granted for the submission of a BHMP then the MOD does not object to this proposal.

TFL Infrastructure Protection:

I can confirm that the planning applicant is in communication with London Underground engineers with regard to the development above. Subject to the applicant fulfilling their obligations to London Underground and Transport for London under the legal requirements between ourselves and the promoter of the development we have no objection to make on this planning application.

Historic England: No comment

Conservation Area Advisory Committee (CAAC):

- In particular, the eleven storey block at the north end of the site will dominate and overshadow the Arts and Crafts style, Locally Listed, station building, its landscaped forecourt, and Kerry Court which is the original open entrance to the 1930's residential estate and the CA. This block also

obscures the station building and forecourt from views looking east along London Road which in effect is the gateway to Stanmore and the CA from this direction.

- The CA, the local area and the wider area of Stanmore is characterised by low rise residential buildings with gardens and this development of between six and eleven storey buildings will not preserve or enhance the setting any of these.
- The architectural treatment of the development is not sympathetic to the character of the architecture of buildings within the CA, or local area, and will not enhance the setting of the CA as required by the Appraisal and Management Strategy.
- Stanmore Station is a transport hub within easy access of the M1, A1 and A41 and acts as a 'park & ride' those travelling into London for business, tourism, or leisure purpose and to reach events at Wembley Stadium. As such the carpark is invariably full and the loss of over 150 public car parking spaces, let alone the the construction of 277 dwellings with no car parking facilities, other than 12 disabled spaces, will result in overspill parking in the local area detracting from the character of those areas, including the CA.
- The application should be refused.
- The development is too high and have a negative visual impact upon the Kerry Avenue conservation are and overshadow the adjacent low-scale railway station and forecourt.

Metropolitan Police Designing Out Crime Officer: No objection subject to clarification on the provision of secure lift lobbies. The other elements outlined below can be addressed by an SBD accreditation condition.

Block A

- No secure lobby for the residential entrance , this needs designing in .
- Details of postal strategy required
- Block A will require full compartmentalising , this can be achieved once a secure lobby is designed in. The developers will need to discuss what is required for compartmentalisation to be achieved, and SBD achieved.
- There is a planter shown between the residential cycle store door and the car park entrance. This planter will need to be at a height were sitting is not possible either too low to sit on , or too high to sit on, or removed.
- The car park will need to work with Park Mark and be designed with Park Mark award achieved, due to good design. SBD works in partnership with Park Mark .
- The gates for the TFL maintenance zone, must be tested and certified security gates, as specified by the British Transport Police design out crime officers.
- In the lower levels there are service rooms and a staircase, but no show access to these areas.

Block B

- No secure lobby for the residential entrance , this needs designing in .
- Details of postal strategy required
- Block B will require full compartmentalising , this can be achieved once a secure lobby is designed in. The developers will need to discuss what is

required for compartmentalisation to be achieved, and SBD achieved.

- The ground floor flats need defensible space between the public garden and their walls and especially their windows.
- What is the management strategy for the public garden? Is it going to be closed to non-residence? Is it going to be locked over night? If it is just open to all 24/7, it could become an anti-social behaviour hotspot.
- The planters at the front need to be at a height where seating is uncomfortable – under 30cm high or over 120 cm high is advised.

Block C

- No secure lobby for the residential entrance, this needs designing in.
- Details of postal strategy required
- Block C will require full compartmentalising, this can be achieved once a secure lobby is designed in. The developers will need to discuss what is required for compartmentalisation to be achieved, and SBD achieved.
- The ground floor flats need defensible space between the public gardens and the walls and especially their windows.
- What is the management strategy for the public gardens? Are they going to be closed to non-residence? Are they going to be locked over night? If they are just open to all 24/7, these could become anti-social behaviour hotspots.
- The cycle store windows should be only one way windows with no visibility in from outside. Or no windows for the cycle store.
- The planters at the front need to be at a height where seating is uncomfortable – under 30cm high or over 120 cm high is advised.

Block D

- The same issues as block C

Block E1

- Fire escape door/ gate, will need alarming and covered by CCTV, as well as be a security tested and certified door gate.
- The town houses should obtain SBD with correct doors and windows

Block E2

- The town houses should obtain SBD with correct doors and windows, confirmation the rear of the Sync area is going to be fenced off is required.
- The rear of the houses backing onto the SINC should have 300mm of soft wood trellis on top of the fencing or walls.
- The plan for the rear of the development as it backs on to the Dalkeith wooded area and the Aylward primary school, is unclear and needs defining.

Block F

- No secure lobby for the residential entrance, this needs designing in.
- Details of postal strategy required
- Defensible space is needed for the undefended ground floor windows.
- The cycle store windows should be only one way windows with no visibility in from outside. Or no windows for the cycle store.
- The planters at the front and sides need to be at a height where seating is

uncomfortable – under 30cm high or over 120 cm high is advised.

Block G

- Same as F

Block H

- No secure lobby for the residential entrance , this needs designing in .
- Details of postal strategy required
- Block A will require full compartmentalising, this can be achieved once a secure lobby is designed in. The developers will need to discuss what is required for compartmentalisation to be achieved, and SBD achieved.
- The overhang on this block looks excessive and may offer access to the 1st floor flats balcony's.
- The rear needs defensible space for the 1st floor flats.
- Some concerns about access behind the block.

Conclusion

- The lack of secure lobby's and lack of information re postal strategy for A,B,C,D,F,G and H blocks is concerning, and with a secure lobby , smart lifts will be required, in order for SBD to be achieved.
- Blocks A,B,C,D,and H, all require full compartmentalisation. To obtain a secured by design award.
- The management of the pocket parks between blocks, A,B,C and D needs to be clear.
- Some defensible space for a number of flats needs designing in .
- The windows for some of the cycle stores needs addressing.
- The management of the SINC area and access to the Dalkeith wooded area needs more explaining.

Environment Agency

No Comment

Thames Water

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

Natural England

No Comment

Canons Park Estate Association

No Comment

Bentley Priory Resident Association: Out of scale with area, tower over Stanmore Country Park - proved important to residents' wellbeing and mental health during Covid lockdown, increase parking and pollution problems, scheme does not benefit local residents

Harrow Nature Conservation Forum:

The proposal would be partly built on woodland that is a Site of Importance for Nature Conservation (SINC) and would adversely impact the natural environment e.g through noise and light pollution and resident disturbance

These impacts can be mitigated by good design and are happy to discuss such mitigation measures

The Harrow Nature Conservation Forum oppose the plans and suggests a revised plan that does not encroach on the SINC

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

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

Specifically, we urge the committee to reject the 11 storey tower at the summit of the site as it is out of character with existing structures, overshadowing and overbearing.

Loss of Light and overshadowing

The proposed 11 storey tower is planned at the summit of the site and of the hill in London Road. The site for the tower is some 16ft above the level of nearby houses making the tower seem taller than the 11 proposed levels. As the area is predominantly detached houses of two levels, a tower of such height would look over the nearby houses blocking light and being intrusive for the properties nearby. The tower is tall enough to cast a shadow over properties in Kerry Court and the north side of London Road in the morning and over properties in London Road and Westbere Drive in the afternoons. We would argue that a tower of such proportions should not be approved at this location.

Overlooking and Loss of Privacy

the majority of buildings proposed on the site would be looking towards gardens in Westbere Drive. However, the proposed tower would be overbearing and looking at properties in London Road, Morcambe Gardens, Westbere Drive, Kerry Court and onto further back streets as it sits at a summit and overbears over two storey properties around it. We would argue that nothing in the applicant's proposal suggests anything to mitigate the loss of privacy from the tower.

Parking and Traffic

The scheme itself proposes to be with zero space for cars, however the developers admit that there is nothing that would restrict residents from owning cars and parking them in nearby streets. Already congested for parking on most days and with multiple traffic and parking controls that were introduced to surrounding areas in the last decade, proposing that residents should park, if they so wish, in nearby streets would create undue burden on the traffic and parking conditions in surrounding streets, would require the Council to introduce further parking controls and increase the cost of enforcement in the

area. Moreover, while the applicant suggests that the area is well served by public transport, it is worth noticing that there is no public transport from that area that is leading directly to either school or supermarket which means that residents of the proposed scheme would be tempted to get cars. The applicant, being TfL is aware of the issues with public transport in the area, they are not willing to commit to correcting any of the issues as part of the application nor are they willing to commit to extend the cycle hire scheme from central London to Harrow. We would argue that while a car free development may be more feasible in central London which is better served by buses, underground, cycle schemes and car hire schemes, until such facilities are offered in Harrow, such schemes should not be permitted.

Effect on Conservation Area / Visual Amenity

The proposed tower would affect the views from both Stanmore Country Park and Canons Park. Stanmore Country Park offers rare views over London whereas Canons Park is a listed park with historic importance. The proposed tower would be clearly visible from both areas damaging the natural beauty and open space views that are currently afforded by those areas.

The tower itself is overbearing, poorly designed and offers no uniqueness in the architecture to make it iconic in its own right.

Road Access

The proposed site is served by a single road shared with the station's car park. Even now, the car park access is dangerous with limited visibility and frequent near accidents. The proposed scheme, as it offers no parking of its own would be served by drivers dropping passengers in the area and driving out to look for parking nearby. This would increase the passage of cars through the narrow, poorly designed access road. Whereas at the moment, most of the traffic is used by commuters and has peaks during rush hour, after the scheme is developed there will be cars going in and out throughout the day to drop passengers and the plan should offer safety measures.

Loss of Car Park Spaces

Stanmore is an end of line station. It is relied upon every day by hundreds of commuters. Stanmore area has also, on average, older population something that perhaps was a reason to the higher than average loss of life from COVID-19 in Canons Ward. The journeys that the applicant suggests are short distance to the station are predominantly from that population which relies on the ability to park at the station for its independence and health. Depriving the commuter and indeed the elderly population from its much needed car park would prove to have an adverse impact on those who need it most.

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

5.0 POLICIES

- 5.1 Section 38(6) of the Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that:
- 5.2 '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.'
- 5.3 The Government has issued the National Planning Policy Framework [NPPF 2019] sets out the Government's planning policies for England and how these should be applied and is a material consideration in the determination of this application.
- 5.4 In this instance, the Development Plan comprises The London Plan 2021 [LP] and the Local Development Framework [LDF]. The LDF comprises The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan 2013 [AAP], the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan [SALP] 2013 and Harrow Local Area Map 2013 [LAP].
- 5.5 A full list of all the policies used in the consideration of this application is provided as Informative 1.

6.0 ASSESSMENT

6.1 The main issues are;

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

6.2 Principle of Development

6.2.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2021): GG2, D3, H1, E9
- Harrow Core Strategy (2012): CS1A, CS1H, CS1I, CS10
- Site Allocations Development Plan Document (2013): Site H10

- 6.2.2 The London Plan sets out to meet London's growth with the boundaries of Greater London. To address a gap between projected housing requirements, including a backlog of need and identified capacity, the London Plan expresses housing targets as minima. Harrow's minimum housing target is 593 homes per annum over the period 2011-2021. Policy H1 of the London Plan (2021) increases the minimum housing target to 802 homes per annum over the period 2020-2030.
- 6.2.3 Harrow's Core Strategy establishes a clear vision for the management of growth in the Borough over the Local Plan period (to 2026) and a framework for development in each district of the Borough. Policy CS1(A) directs growth to the Harrow and Wealdstone Opportunity Area and throughout the rest of the borough, within town centres and strategic, previously-developed sites. The policy provides for that growth to be managed in accordance with the relevant sub area policies. Policy CS7, for the Stanmore and Harrow Weald sub-area, encourages the redevelopment of identified, previously developed sites to collectively contribute at least 712 homes towards the Borough's housing allocation. This is to be brought forward in accordance with Core Policy CS1(H), which details that the Area Action Plan for the Harrow & Wealdstone Opportunity Area, and the Site Allocations Development Plan Document for the rest of the Borough, will allocate sufficient previously developed land to deliver the required housing targets.
- 6.2.4 Within the context of planned growth across London, the proposal therefore accords with Harrow's vision for the development of the Borough as a whole and for the Stanmore and Harrow Weald sub area. Specifically, the proposal for the provision of housing on the site is consistent with the Strategy's broader objective to meet development needs on previously developed land, and to do so in sustainable locations, without resorting to development on greenfield and garden land.

Delivery of Site Allocation H10

- 6.2.5 Turning to the detail of the site's allocation, it is included as Site H10 of the Harrow Site Allocations Development Plan Document (2013). The allocation is for a partial redevelopment of the site for residential purposes, while retaining adequate car parking provision, to continue to meet the demand generated by commuters and in connection with major events at Wembley stadium.
- 6.2.6 The site allocation includes an indicative figure of 44 homes for the residential use. The commentary to the site allocation details the housing capacity is indicative, based on half of the site being redeveloped for housing. The methodology for calculating the potential residential capacity of sites is explained at Appendix B of the Site Allocations Local Plan document; the appendix notes that housing capacity figure attributed to each site is indicative not prescriptive and that the actual number of dwellings that may be achieved on each site may be determined by many considerations, including design & layout, the size & type of homes to be provided and scheme viability. It should also be noted that the minimum numbers of homes to be brought forward in the site allocations

document reflected the then housing target of 350 homes per year. The current London Plan target is now 802 homes per year.

- 6.2.7 In terms of output, the subject application proposes 277 units for the site, which is significantly higher than that envisioned under the site allocation. Within the strategic policy context and taking into account the indicative status of the housing capacity figure included in the site allocation, it is considered that the increase in the housing output of the site could still be considered acceptable.
- 6.2.8 The NPPF requirement to go beyond housing targets is reflected in London Plan Policy H1 Increasing housing supply and H2 Small Sites. The capacity / number of homes (44) identified in the site allocation H10 is indicated in the accompanying text as being 'indicative', based on assumptions made at the time (at least eight years ago) regarding the extent of the site to be developed (partial) and the level of re-provision of car parking. The current application provides evidence regarding the appropriate level of re-provision and seeks to provide this in a semi basement, enabling for more efficient / 'optimal' capacity of the site. The indicative capacity was also based on the London Plan density matrix used to determine a capacity for plan making purposes (in the absence of a detailed design process / typology). The current application represents the outcomes of a detailed design process and subject to the acceptability of the design, better represents the capacity of the site.
- 6.2.9 The NPPF (para 33) indicates that strategic policies (such as housing requirements / targets) should be reviewed every five years, particularly where the relevant housing need requirement has increased significantly (as has been the case for London / Harrow). Consequently, the 2012 Core Strategy housing target was replaced by the 2015 update to the London Plan, which in turn is replaced by the London Plan (2021) – so the 802 homes per year target is the most recent / current target that supersedes the 350 homes target in the Core Strategy. Any housing related matters in the Harrow Local Plan (such as indicative capacities of site allocation) need to be interpreted and applied in this context.
- 6.2.10 In addition to other considerations outlined above, the quantum of housing in terms of the site allocation lies with ensuring an appropriate quantum of car parking being re-provided. The commentary to the site allocation notes that any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere. The station car park currently provides 446 spaces. The subject application would retain 300 car parking spaces and would also provide a TfL Cycle Hub. While it is acknowledged that the provision of the Cycle Hub provides a (sui generis) use which is not identified in the allocation, officers acknowledge that this would be integral to support the modal shift to more sustainable methods of transport in arriving to Stanmore Station Underground Station, thereby supporting the requirement to retain sufficient commuter parking. The transport and parking impacts of the proposal have been considered in detail within section 6.7 of the report. The Council's Highway Authority have concluded that a reduction in the public station car parking can be accepted, provided suitable mitigation measures

are introduced, which are to be secured through appropriate planning obligations and conditions.

Commercial Use

- 6.2.11 The proposed development also seeks to provide two commercial units at ground floor level within building A fronting London Road. The application seeks a flexible consent for these units to allow for occupiers to be identified post planning, responding to the market and demand. These units are proposed as flexible retail (Use Class E a, b, c (formally Class A1/A2/A3)), to allow for a range of occupiers in the future. The unit to the east of building A would be 144sqm and the unit to the west would be 85sqm in area. Policy 4.8 of the London Plan (2016) and policy E9 of the Publication London Plan (2020) seek to encourage local convenience and facilities to serve existing and new communities.
- 6.2.12 Although, the proposed commercial uses are not specifically identified in the site allocation as a proposed use, it is considered that the units would be small scale and very much ancillary to the overall proposals. The site is located next to a busy tube station and approximately 450 metres to the east of Stanmore District Centre and as such it is considered that such uses would be appropriate in this location as part of a mixed use residential development and is not considered to result in any harm to the vitality to the adjacent town centre. At present, the level of activity along this part of London Road is limited. The range of uses applied for would ensure that the proposed development would have the capacity to the overall development and complimentary contribution in terms of local employment and local community facilities. The proposed commercial space would also help enliven the street in this location, resulting in increased pedestrian activity and a greater sense of security. Taking into account the factors, it is considered the small ancillary commercial element would be acceptable in relation to the above outlined policies of the development plan.
- 6.2.13 In conclusion, the proposal would acceptably deliver the residential component of the site allocation and re-provide an appropriate of commuter car parking capacity on the site, subject to further mitigation measure being provided. The principle of the site's allocation in the Harrow Local Plan was in recognition of the site's potential to deliver residential development, helping to meet the Borough's projected needs in a way that is consistent with the Borough's spatial strategy. This includes the delivery of housing on brownfield land and directing growth to areas with good public transport accessibility. On this basis, Officers consider that the principle of development would be acceptable, and the proposal would comply with the relevant policies in this regard.

6.3 Housing Output

- 6.3.1 The relevant policies are:
- National Planning Policy Framework (2019)
 - The London Plan (2021): GG4, H1, H4, H5, H6, H10
 - Harrow Core Strategy (2012): CS1I, CS1J, CS8I
 - Harrow Development Management Policies (2013): DM24

- Mayor of London Affordable Housing and Viability Supplementary Planning Guidance (2017)
- Mayor of London Housing Supplementary Planning Guidance (2016)

Affordable Housing, Mix and Tenure

- 6.3.2 Affordable Housing is detailed in the National Planning Policy Framework (2019) as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the definitions within the following: affordable housing for rent, starter homes, discounted market sales housing or other affordable routes to home ownership (including shared ownership).
- 6.3.3 The proposed development triggers an affordable housing requirement as it constitutes a major residential development. Policy H4 of the London Plan sets out a strategic target for 50% of all new homes delivered across London to be genuinely affordable. The policy also specifically requires that 50% of the quantum of housing is delivered as an affordable product on public sector land.
- 6.3.4 Having regard to Harrow's local circumstances, Policy CS1(J) of the Core Strategy sets a Borough-wide target for 40% of all homes delivered over the plan period (to 2026) to be affordable, and calls for the maximum reasonable amount to be provided on development sites. In terms of dwelling mix, London Plan Policies makes reference to the priority that should be accorded to the provision of affordable housing. Policy DM24 of the Development Management Policies requires development proposals to secure appropriate mix of housing on site and to contribute to the creation of inclusive and mixed communities, having regard to the target mix for affordable housing set out in the Councils Planning Obligations SPD. Considerations include the priority to be afforded to the delivery of affordable family housing, the location of the site, the character of its surroundings and the need to optimise housing output on previously developed land.
- 6.3.5 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 in 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.
- 6.3.6 The application proposes to deliver all the proposed residential units as affordable housing. By reason of offering more than 50% affordable housing, the application has followed the 'fast track route' (as set out in Policy H5 of the London Plan), which allows applications to not be subject to an appraisal in relation to the Financial Viability of the scheme. The proposal would have the following tenure and unit mix:

Table 1: Tenure Mix

	Total Units	% of Total	Total Habitable Rooms	% of Total
London Affordable Rent	68	25%	302	35%
Shared Ownership	209	75%	554	65%
Total	277	100%	856	100%

Table 2: Housing Mix

	1 Bed	2 Bed	3 Bed	4 Bed	Total (units)
London Affordable Rent	8	26	22	12	68
Shared Ownership	87	115	7	0	209
Total	95	141	29	12	277
Percentage Mix	34%	51%	11%	4%	100%

- 6.3.7 In terms of housing mix, for a scheme of this scale and its accessible location, it is likely to be attractive to small families or professional groups. As such, the unit mix is considered to be appropriate in this location and would respond to the local demand for 2-bedroom, four person homes. The provision of a component of three- and four-bedroom units would make a valuable contribution to the overall mix of homes within the development by extending choice across all tenures seeking larger accommodation.
- 6.3.8 In order to comply with the Core Strategy Policy requirement for 40% affordable housing on all the units proposed, this would equate to an approximate requirement of 111 units out of the 277 to be affordable. The Mayor's Affordable Housing SPG details that the percentage of affordable housing in a scheme should be measured by habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes. Having regard to this, the 40% requirement would be the equivalent to 342 rooms to be provided. When taking the policy compliant split (60/40) into account by habitable rooms, this would require approximately 205 rooms to be provided as London Affordable Rent and approximately 137 rooms to be provided as an intermediate tenure. The proposed 68 London Affordable Rent units would consist of a mix of one, two bed units as well as some larger three and four bed family units and would equate to the provision of 302 rooms (or 35% by habitable room) as London Affordable Rent. The 302 London Affordable Rent habitable rooms would represent 88% of the policy compliant offer (61% by unit). However, a total of 554 habitable rooms would be provided as Shared Ownership making up the remainder of overall provision or 65% by room (75% per unit).

- 6.3.9 In relation to the local requirement for 40% of the overall units to be affordable housing, and the appropriate tenure split within that, the proposed development would be compliant in this regard. The provision of 68 affordable rented units would reflect the minimum Core Strategy requirements. In relation to the London Affordable Rent units, the provision family-sized units (2 bed and 3 bed units) would assist in meeting the priority need of the Borough and seven of the London Affordable Rent units would also be wheelchair accessible, which is welcomed. Further to this, the land is owned by TFL (public sector land) and is therefore in accordance with policy H4 of the Publication London Plan (2020) in relation to the requirement for at least 50% affordable housing to be delivered.
- 6.3.10 However, in this instance, whilst the applicant has provided 40% as a local policy compliant split, there is concern with the remaining 60%, as this 'additional' affordable housing will be offered as Shared Ownership. The applicant, in their supporting information has noted that Harrow has a small housing stock with high demand for housing from homeless households; the additional / 'voluntary' Shared Ownership units will however do little to address the needs of such households or those in temporary accommodation.
- 6.3.11 Following Policy H5 of the London Plan (2021), paragraph 4.5.10 sets out advice in terms of schemes that offer more than 75% affordable housing, which may follow the Fast Track Route where the tenure mix is acceptable to the borough or the Mayor where relevant. From the LPA perspective, an agreement to the mix between London Affordable Rent and Intermediate Products can only be made based on the relevant evidence. The Harrow Strategic Housing Market Assessment was completed in 2018, which formed part of the West London Strategic Housing Market Assessment. In terms of affordable housing tenure, it concludes that the need of 9,600 additional affordable dwellings over the 25-year period 2016-41 (an average of 384 per year). Of this, the demonstrable need is for 70% at social rent and then 30% as intermediate products. It is therefore regrettable that additional London Affordable Rent homes are not proposed, over and above those within the 40% policy compliant element, as this tenure is in high demand in Harrow to meet priority housing need.
- 6.3.12 Although the applicant in providing their affordable housing offer, has acknowledged the situation that Harrow is in with regard to its housing stock, and the pressures faced in terms of delivering affordable homes to alleviate homelessness / people in temporary accommodation, they have still proposed an overwhelming quantum of an affordable tenure that is not the evidenced need and does little to address the housing pressures they have specifically identified. This was discussed at length with the applicant at pre application stage but unfortunately the offer has remained the same following submission of the application.

Genuinely Affordable Product

- 6.3.13 Notwithstanding the commentary above in terms of achieving the appropriate balance between the two affordable products, it is also important that these tenures are 'genuinely affordable'. The draft New London Plan (2019) (Intend to

Publish Version) across each of its Affordable Housing Policies, state that the Mayor will seek genuinely affordable housing to be delivered.

- 6.3.14 In terms of the London Affordable Rent, the applicant has stated that this would be let in accordance with the GLA's definition / rent levels. All service charges will be in addition to the rent. This approach is considered to be appropriate.
- 6.3.15 The Shared Ownership offer, which makes up the majority of the housing quantum, is proposed to be brought forward in line with GLA guidance. Specifically, this is stated as being affordable to households with an income of up to £90,000. The applicant does go onto state that there will be a cascade mechanism within the S.106 agreement (in the event that the scheme is approved), that will ensure for the 3 months that units would be offered exclusively to Harrow residents at locally agreed income threshold caps. After the initial 3-month period, the units would be marketed to the wider West London area.
- 6.3.16 Specifically, the LPA has sought detail from the applicant to demonstrate that the Shared Ownership products being offered are genuinely affordable to Harrow residents (based on an average Harrow household income at Borough and Ward Level).
- 6.3.17 During the course of the application, in order to reflect the long established concerns with regard to affordability and reflect the pre application discussions with the applicant, further information has been sought in relation to the proposed caps and the basis of these with respect to affordability (including lower rental levels on the retained equity for larger units).
- 6.3.18 The latest GLA Annual Monitoring Report (October 2019) states that intermediate ownership products such as SO would be affordable to households on incomes up to £90,000, and on average to households on £56,200 per annum.
- 6.3.19 Local LBH affordability requirements are set out in the Harrow Planning Obligations SPG dated 2013, but this has been updated to a figure of £49,000 household income per annum. No variance or provision is made for homes of different sizes within this LBH cap.
- 6.3.20 Overall policy concurs that intermediate ownership products such as Shared Ownership are to be affordable for those households unable to access low-cost rented accommodation, but also then unable to afford home ownership through mortgaged home ownership.
- 6.3.21 The purchase of a Shared Ownership home consists of an initial share, financed through a deposit and mortgage, and rent on the unsold share. Policy requires the initial share to be between 25-75% and rent on the unsold equity should be no greater than 2.75% of the unsold equity according to the GLA's Affordable Homes Funding Guidance.

- 6.3.22 The GLA define that housing costs to be affordable for a gross income, the housing costs should be no greater than 40% of net household income, with net household income defined as 70% of gross income.
- 6.3.23 In response the applicant submitted an Affordable Housing Supplementary Planning Note setting out additional information with regard to the modelling of income caps and the proposed cascade mechanism proposed to be secured through section 106 agreement in the event that planning permission is granted. The Shared Ownership offer being put forward on the site is as follows:

Unit Type	Initial Share	Rent on Unsold Equity	Proposed Income Cap
1 Bedroom	40%	2.75%	£55,000
2 Bedroom	35-40%	2.75%	£70,000
3 Bedroom	25%	1.80%	£74, 500

- 6.3.24 The additional information submitted by the applicant outlines that the proposals are constrained in terms their viability and currently fall short of the target profit return on the basis of the current affordable offer and that any changes to the proposed offer to increase the London Affordable Rent units on site would further reduce the viability of the scheme.
- 6.3.25 Additionally, the applicant outlines that the proposed cascade mechanism would be supported by a targeted period of marketing for Harrow residents prior to being opened up to the wider market. This would include digital activity, leaflet drops, outdoor media such as posters and billboards, social media and a PR campaign by catalyst.
- 6.3.26 Overall, officers consider that is positive the proposals would achieve a policy compliant offer of 40% in the required tenure split of 60:40. It is also accepted that the minimum incomes/ caps will comply with GLA requirements. Nevertheless, taking account of the average household income in Harrow (£49k), it clear from the above table, that only 1 bed units would be genuinely affordable to Harrow residents. 2 bed units and above would not be genuinely affordable to Harrow residents and would only be in reach of above average household incomes. Again, it is regrettable that Harrow residents would for the majority, not be in a position to be able to afford the units within the scheme. It is noted that the supplementary affordability note seeks to compare average household incomes in Harrow (£49k) with average individual incomes (£43k) x 2 for a couple. However, this is not considered to be comparable. The £49k household average in Harrow reflects the mix of single persons, couples, couples with children but with one income.
- 6.3.27 It is acknowledged the scheme would offer a lower rent for the 3 bed Shared Ownership which is positive (1.8% below the Mayor's cap of 2.75%). However, this has minimal benefits as it only applies to a minimum number of units.

- 6.3.28 The applicant has outlined there is evidence for demand of Shared Ownership take up within Harrow and has provided an example of a recently completed development on Burnt Oak Broadway in the neighbouring borough of LB Brent. The development on Burnt Oak Broadway suggested local demand for Shared Ownership (40% of purchasers within local postcodes). The predominant purchaser group was between the late 20s and early 30s, however, there was demand across all age demographics. However, given only one scheme is provided this does not provide a strong evidence base. Moreover, demand does not necessarily reflect the greatest need which in Harrow is identified to be London Affordable Rent.
- 6.3.29 As outlined above, the scheme qualifies for the Fast Track route and therefore is not subject to a financial viability assessment review. During the course of the application, the applicant has consistently outlined that they are unable to provide any more London Affordable Rent or public realm improvements due to viability. However, in the absence of any evidence, officers are unable to give this much weight. On this issue, the applicant has sought to provide further clarification in the additional affordable housing note.
- 6.3.30 The submitted financial note, prepared by DS2 suggests 0% profit for London Affordable Rent (LAR) and 15% for Shared Ownership. Normally this would be around 6% for both and 15% is only just below what GLA is arguing for private sale units (16.5%). The outlined weighted target profit return is 12.43% which is only just below the typical blended rate for a policy compliant Affordable Housing balance private scheme of circa 14.5% suggesting that the applicant is targeting an overall profit level similar to that of a private housebuilder. The document comments that a 15% profit for Shared Ownership is required due to sales risk and to cross subsidise the London Affordable Rent. However, the Shared Ownership sales risk is no different to any other scheme where the profit level is 6%. Moreover, profit is not used to 'cross-subsidise' the London Affordable Rent – it is essentially the lower residual land value that does this. If the applicant considers there is such great sales risk for the Shared Ownership element, officers would question why so much is proposed? The document suggests that Stanmore produces a negative profit return (-11.57%) although it is not noted if the applicants have taken into account the Gross Development Value of the car park, although the cost has been included. In summary, the additional information provided is not a Financial Viability Assessment and provides insufficient evidence to support the claim that more LAR units could not be provided. It is therefore given little weight.

Conclusion

- 6.3.31 The proposal would offer 277 units, all of which would be offered as affordable housing. 40% of the units would deliver a policy compliant tenure split which is acceptable. However, the proposal clearly offers an affordable housing offer that is weighted heavily to a tenure that there is not a substantial need for, being Shared Ownership. By reason of this, it results in a much lower quantum of London Affordable Rent, which there is an evidenced need for, and which offers much more in terms of alleviating homelessness within Harrow and wider

London. Notwithstanding the imbalance in tenure, it is also noted that a significant number of the Shared Ownership units (2bed and above), would not be affordable to Harrow residents, when compared to the Harrow average household incomes. The additional rental discount on the 3 bed Shared Ownership Units would offer limited benefits overall to mitigate the overall quantum of units in this tenure as a total of only 7 units is proposed.

- 6.3.32 By reason of the above, the weight that can be afforded to the 100% affordable housing offer in the broader planning balance is limited by the fact that the 'additional' affordable housing offer above that required by Harrow's Local Plan is of a tenure for which there is a lower identified need for. The limited weight of the affordable housing offer is balanced against the known impacts of the development, including impacts on biodiversity, highways / parking, harm to heritage assets as discussed in detail in sections 6.5, 6.7 and 6.8 of this report.
- 6.3.33 In the event, that approval is recommended for the application, the cascade mechanism and the income caps set out above can be secured through a 106 agreement.

Housing Supply and Density

- 6.3.34 London Plan and Local Plan policies on housing development must be viewed in the context of the forecast growth across London and Harrow's spatial strategy for managing growth locally over the plan period to 2026. These are set out in the Principle of Development section of this report (above). The proposal's contribution to housing supply ensures that this previously developed and allocated site makes an appropriate contribution to the borough's housing need over the plan period to 2026 and towards fulfilling the Core Strategy's target for the Stanmore and Harrow Weald sub area.
- 6.3.35 Furthermore, the regional policy context (policy H1 of the London Plan) requires boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites with particular focus on sites with existing access levels (PTALs) 3-6 that are located within 800m distance of a station, and redevelopment of car parks and low-density retail parks and supermarkets as a source of capacity.
- 6.3.36 Policy D3 of the London Plan (2021) seeks to optimise higher density development around locations that are well connected to jobs, services and infrastructure and amenities by public transport, walking and cycling. The character of the surrounding area is generally urban in nature, having regard to the proximity of Stanmore Station and Stanmore District Centre and the taller four/five storey blocks of flats along London Road which is regarded as a main arterial route. The Housing SPG (2016) notes that locations within 800 metres of a District Centre are generally considered to give an area an urban setting (paragraph 1.3.33). The site has a mixed PTAL rating of 2/3/4. However, there are aspects of the context which fit the 'suburban' character definition including the two storey semi-detached dwellings to the east along Westbere Drive. The average density across the site is 319 habitable rooms per hectare and 103 units

per hectare. In this instance there are other considerations which provide justification for the development to the density proposed.

- 6.3.37 Furthermore, the London Plan (2021) has removed the density matrix that was previously included in order to promote a design lead approach rather than the application of a prescriptive matrix. Policy GG2 of the 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 draft Plan which holds significant weight.
- 6.3.38 The design considerations of the development have been considered in detail within the subsequent sections of the report. As noted in the submitted Design and Access Statement, the application proposal has been the subject of extensive pre-application discussions with the Council and has evolved in response to design scrutiny following Design Review Panels and discussion with Council Officers.
- 6.3.39 Taking into account the new London Plan Policy, the mixed PTAL range of the site and its accessible location in close proximity to Stanmore Town Centre as well as the proposed mix of units, the allocation of the brownfield site in the Local Plan, its current function as a car park, which is specifically identified as a source to increase housing growth capacity, on balance it is considered that such a density is appropriate in this location.
- 6.3.40 It is acknowledged that some respondents to the application consultation have expressed concern about overdevelopment of the site. Officers maintain that the site is capable of accommodating such a density, but more consideration needs to be given to the local context, in particular the impact on adjacent heritage assets and adjacent residential character to achieve an acceptable overall scheme. This is discussed in more detail in the section 6.5 of this report.
- 6.3.41 In summary, it is considered that the proposed mix of homes/types would respond to the location of the site and the character of its surroundings whilst optimising the housing output of the allocated site within Stanmore. The proposal would add to the supply of contemporary new build homes in the area, all of which would achieve accessible and adaptable standards and 10% of which would also achieve the enhanced requirements needed to be classified as Wheelchair-standard homes. Taken together with the affordable housing component, it is concluded that the proposal would make a positive contribution to the creation of inclusive and mixed communities in the borough.

6.4 Townscape, Character, and Design Quality

- 6.4.1 The relevant policies are:
- National Planning Policy Framework (2019)
 - The London Plan (2021): D1, D3, D4, D5, D8, D9, D12
 - Harrow Core Strategy (2012): CS1B, CS1E
 - Harrow Development Management Policies (2013): DM1, DM2,

- Mayoral Housing Supplementary Planning Guidance (2016)
- Residential Design Guide Supplementary Planning Document (2010)

Context and Layout

- 6.4.2 As set out in the site allocation H10, any proposal for the site would need to retain adequate car parking provision to continue to meet the demand generated by commuters and in connection with major events at Wembley Stadium. Further key constraints of the site include the railway embankment which is sited immediately to the west of the application site, the need for a TfL maintenance strip along that boundary, the layout of the development to allow for emergency TfL Crane access to the railway embankment, the adjoining heritage designations directly to the north west of the site, the SINC, the level change across the site and the adjoining two storey residential dwellings of Westbere Drive.
- 6.4.3 As noted in the supporting Design and Access Statement, the proposed site layout in terms of massing and typologies has sought to respond to the long and narrow site. The proposed site consists of three groups of buildings, in total 7 standalone residential buildings between six and eleven storeys in height and 19 three storey townhouses.
- 6.4.4 Mansion blocks are proposed to the north of the site to provide a more urban scale. The applicant outlines these are intended to echo Stanmore Broadway and respond in height and massing to the new Landsby building to the west on the opposite side of the railway tracks.
- 6.4.5 In the middle at the sites narrowest point, a street of terraced houses are proposed in order to minimise residential amenity impacts including overshadowing to the adjacent neighbouring residential dwellings in Westbere Drive and create a distinctive yet more typical suburban environment.
- 6.4.6 To the south of the site, a neighbourhood green is proposed with a villa typology with buildings situated partially within the SINC. The buildings would be rotated in relation to each other in order to frame the public realm in front of them.
- 6.4.7 The proposed buildings consist of a range of taller and tall buildings. The Harrow Development Plan identifies taller buildings as those two or three stories higher than the prevailing height and tall buildings as higher than 30 metres in height. The definition of a tall building is also reflected in policy D9 of the London Plan (2020). The proposal, by nature of its height is therefore considered to include a range of taller and tall buildings. Specifically building A (11 storeys) to the north of the site and building H (10 storeys) at the southern end of the site would constitute tall buildings.
- 6.4.8 The first phase of the development would comprise the Mansion Blocks to the north, namely buildings A to D. In this part of the site an area of public realm is proposed on top of a single storey car park podium which provides 300 commuter car parking spaces. Buildings A, B, C and D would be sited on top of the podium varying in height from 6 to 11 storeys. A raised ground floor and

planted defensible space is proposed to provide a privacy buffer to the ground floor residential units. Pockets parks and green amenity space are located in between the buildings. Entrance lobbies are located centrally within the blocks.

- 6.4.9 Building A is positioned 35 metres away from the station and a 22-metre buffer zone would be provided to building B to the south. The access ramp to the car park is located in between the building as is the TFL cycle hub. Buildings B and C would be separated by a 20-metre gap with the gable ends overlooking the proposed pocket park. Buildings C and D would be separated by a 12-metre gap with a smaller pocket park. The southern gable end of building D would face the street houses. The residential entrance of Building A would address London Road at the top of the site whilst the entrances to buildings B, C and D would face towards the new street.
- 6.4.10 The second phase of the development would comprise the three-storey townhouses at the narrow point of the site. The facing houses would be separated by a 12-metre gap. The Villa buildings (Building F, G and H) would be sited partially within the SINC. Building and F and G would be six storeys and building H 10 storeys. The villa buildings would be separated by a 15-metre gap at their narrowest point. Directly opposite buildings G and H is the TFL crane operation zone which is required to be safeguarded for occasional use but for the majority of the time this space would be occupied by residential accessible parking spaces.
- 6.4.11 Given the long, linear and tapering site, and the unique edge conditions to the west with the railway embankment, the proposed layout is generally considered to be appropriate for the site, subject to further detailed consideration in relation to impacts on the SINC which is discussed in section 6.8 of this report. The final layout, including the vehicular access point into the site, has been carefully considered in relation to the functional requirements of the proposed residential use and car park re-provision, and has been based on recommendations by design experts during the course of the development process. However, with the exception of the townhouses, it is considered the approach to the site layout is less successful in addressing neighbouring residential contexts, in particular the residential properties directly to the east along Westbere Drive as well as the Kerry Avenue Conservation Area which is discussed in more detail below.

Scale, Massing and Design

- 6.4.12 With the exception of the Landsby building to the west at 7 storeys, the predominant prevailing character is the two and three storey buildings within close proximity of the application site. In terms of character and design they are generally late 20th century brick structures with a mixture of flat or pitched roofs. London Road widens to the east of the station with the main road flanked by single lanes to the north and south. These strips are densely planted with mature trees and shrubs which provide a buffer to the adjacent two storey detached housing. The character is cohesive and generally positive in character. The site lies within the setting of the Kerry Avenue Conservation Area which contains higher value townscape of distinctive inter war International or Modern Movement

architecture. Stanmore station is locally listed is a 1.5 storey Arts and Crafts character building.

- 6.4.13 The proposed development would introduce a development of contrasting scale and height, that would be a notable transition from the existing and prevailing building heights within the locality. As detailed in the townscape assessment below, this would contribute to a perceived change in townscape character from some viewpoints within the locality. However, it is important not to conflate visibility with harm in all cases. The proposed residential buildings, although unquestionably larger than the surrounding built form, would nonetheless benefit from a high degree of articulation and the gaps between buildings would also assist in breaking down the massing. Across the site, the different scale of the buildings would create an interesting juxtaposition and variety between buildings, which is not uncommon in built up areas such as this.
- 6.4.14 Building A would be significantly taller than existing adjacent buildings, including the listed Stanmore Station building. Building A is set back from London Road which would help ensure the existing building line of the station is preserved. It is considered that the siting and scale of building A would be appropriate when viewed in the context of the Landsby Building and helps to reinforce the spatial hierarchy of the local context, marking Stanmore Station as a key transport node.
- 6.4.15 Linked building B to the south would provide an appropriate transition in scale to seven storeys as it moves closer to the residential character area. Building A and B would be separated by a 22-metre gap which assists in breaking down the massing of these two larger mansion blocks. Moreover, building B is sited in the gap between 85 London Road and 8 Westbere Drive and is not directly facing any of the lower scale residential properties.
- 6.4.16 The introduction of the three storey townhouses at the narrow point of the site are particularly successful in addressing both the neighbouring residential context and providing some visual relief to the site itself. Buildings F, G and H are located at the lowest point on the site, being approximately 8 metres lower than London Road to the north. This level change and the siting within the mature tree canopy helps to assist in reducing the visual impacts of the scale and massing and is considered to be acceptable in relation to its immediate surrounding context with the SINC. It is considered that block H is successful as a tall building at the rear in providing a bookend to the site and would provide a positive visual impact on the approach to the arrival at Stanmore Station from the south.
- 6.4.17 The proposed urban form on the site would vary markedly from the surrounding context, in particular to the eastern edge condition of the site. However, it is acknowledged that this is an allocated housing site which should seek to optimise housing density, particularly given its siting next to a significant transport node. Taking account of the location and the fairly large site size, it offers unique characteristics and in officers' opinion the site is considered capable of creating its own setting with an overall different and district character. With the exception of buildings, A, C and D, officers considered that the general approach to the site conditions and surrounding area is well considered in terms of proposed typologies and their scale and massing.

6.4.18 Three Design Review Panels (DRP's) were convened prior to the submission of the planning application. The purpose of these DRP's was to enable a panel of experts to consider the scheme and to provide officers with their opinion on the design quality of the proposed development. The design of the proposed development has evolved from that conceived during the early stages of the planning process, taking on board recommendations by the DRP and Council Officers. The proposed design has addressed some key considerations raised in the design review comments by;

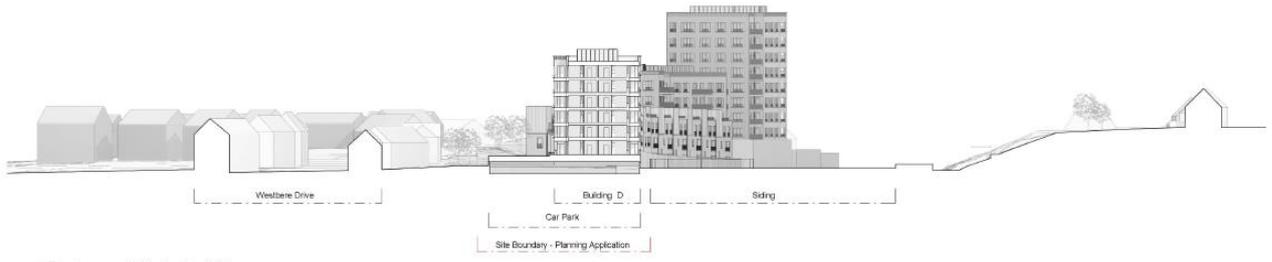
- Revising the architectural approach to Building A through introduction of larger glazing areas and more vertical expression as well as the introduction of a substantial plinth and a clearly expressed top. Added depth was incorporated into the facades through introducing brick piers, concrete panels and recessed windows. The materiality was amended to include brick, concrete and metalwork with brown/red brickwork referencing the station building and light concrete referencing the facades of Kerry Avenue.
- Developing three distinct typologies that relate to the immediate context of the site with an Urban form at London Road, followed by townhouses and finally three woodland villas which respond to the immediate SINC context.
- Building A has been relocated to be in line with the building frontage of the station, this has created a more generous and welcoming public realm area in front of building A which will help to encourage pedestrian movement and activate the street.
- The podium car park has been rationalised and lengthened so as to reduce the impact, the podium does now not present as a cliff edge and uses the slope of the land to deliver an acceptable quantum of parking.
- The public realm has been enhanced to prioritise the pedestrian experience and improve the public realm
- The link building between blocks A and B has been amended and now presents as a simpler form and will include a biodiverse roof as per the remainder of the site.

6.4.19 Overall, the final response from the DRP was positive with support expressed for the scheme noting that: *“The Panel commends the team’s general design approach and is supportive of the proposal. The scheme demonstrates a variety of typologies, and most buildings respond to the idea of ‘a new Metroland’ for Harrow well. The point blocks in a ‘Roehampton’ style to the SINC are particularly successful. It is disappointing to see that the station forecourt remains excluded of the project scope and is not rationalised beyond the red line site boundary, where hedges and clutter remain inherited issues for the development. However, the design team is commended for pulling the footprint line away from Station Road to improve the limited public realm to Building A, in turn creating a more slender building form.”*

6.4.20 The proposed scale, massing and design of the development has been informed and conceived through a design-led approach which was subject to design scrutiny as advocated by Policies GG2, D3 and D4 of the London Plan (2021). A

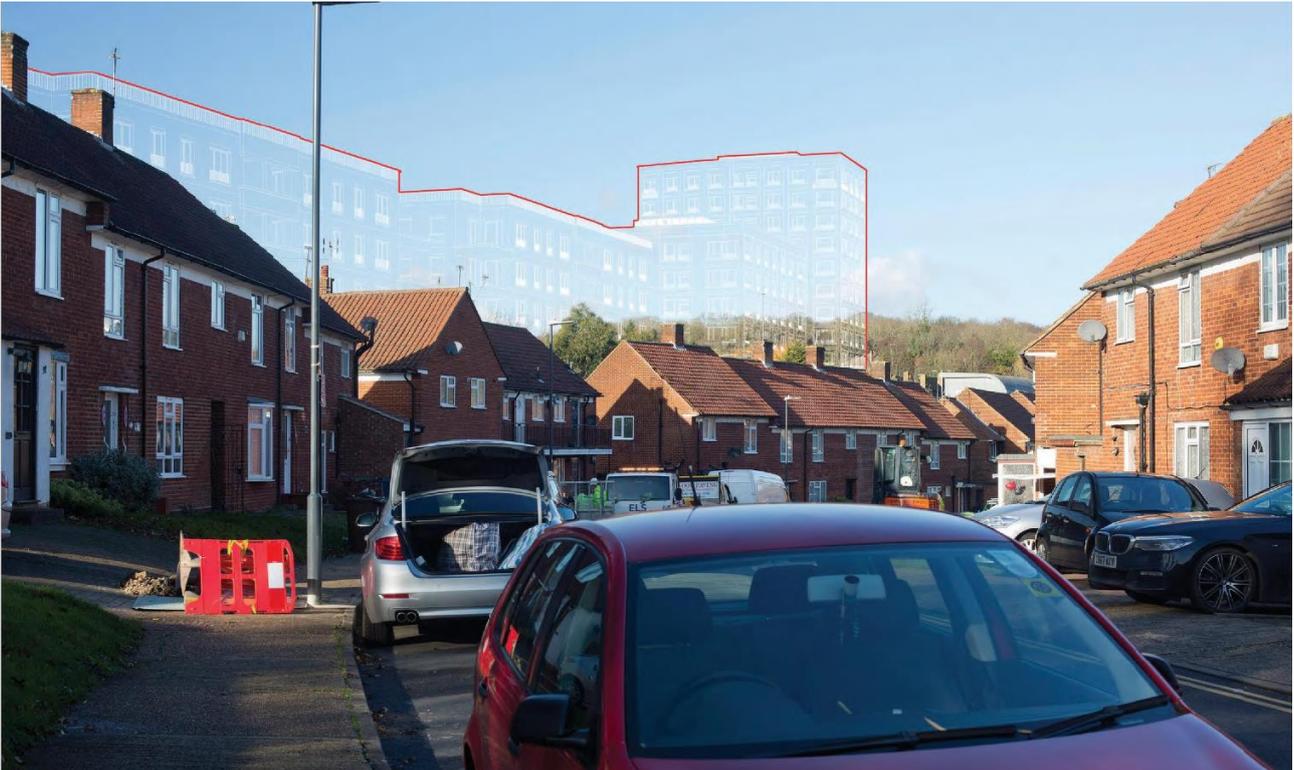
key objective of the Local Plan is to ensure that all developments are of a high standard of design and layout. Various experts in the design field have considered the scheme and have not raised any fundamental objections to the massing or design. Officers are mindful of this expert advice and in general consider that the proposed buildings would respond to the challenging constraints of the site and beyond and optimise the site capacity through the design-led approach. Nevertheless, as noted above, there are some exceptions to this in terms of the response of building A to the Kerry Avenue Conservation Area and to the residential properties in Westbere Drive in respect of blocks C and D in particular.

- 6.4.21 Notwithstanding the above, in officer's opinion, it is considered the scale and massing of buildings C and D at six storeys do not provide an appropriate response to the neighbouring residential properties of Westbere Drive. Officers accept that large sites such as this should not be ruled out from defining their own setting and accommodate higher densities' than the surrounding area. Nevertheless, this needs to be done in a sensitive manner in terms of providing an appropriate transition of scale and massing in relation to the immediate surrounding context.
- 6.4.22 The Housing SPG (2016) notes that "*Where large sites abut areas with a particularly distinctive character a considered approach to the design of edge conditions along a site's boundary may be necessary in terms of height, massing, scale or landscaping to enable higher densities to be achieved*". Local Plan Policy DM1 (2013) outlines that "*the assessment of design and layout of proposals must have regard to the massing, bulk, scale and height of the proposed buildings in relation to the location, the surroundings and any impact on neighbouring occupiers and the assessment of privacy and amenity considerations will have regard to the assessment of the relationship between buildings and site boundaries as well as the visual impact of development when viewed from within buildings and outdoor spaces*".
- 6.4.23 Blocks C and D would be large in scale, spanning a width of approximately 43 metres at six storeys in height. The distance between the adjacent properties n Westbere Drive and eastern elevations of blocks C and D would range between 27 metres and 38 metres and the distance to the boundaries would be approximately 16 metres. When viewed from the neighbouring garden levels of the properties in Westbere Drive, the buildings in some places would rises approximately 23 to 24 metres above. Taking account of these factors, it is considered the proposed blocks would give rise to an overly dominant and overbearing scale and massing in relation to the two storey residential properties in Westbere Drive. This is illustrated from the section below as well as some of the images from the Townscape and Visual Impact Assessment (TVIA). The viewpoints illustrates the large magnitude visual effect which would arise for local residents in views along the street and from west facing windows in the direction of the development.

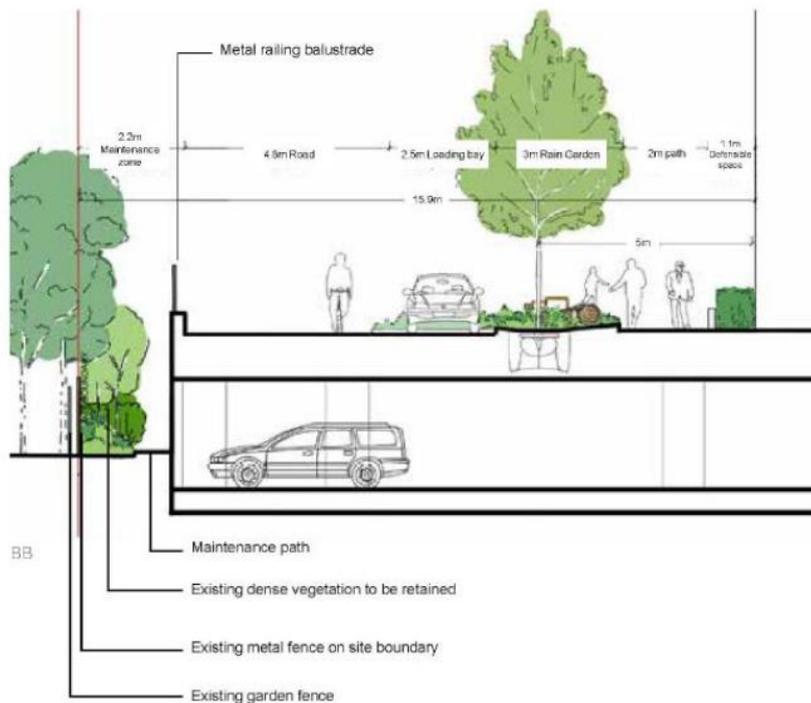


2 Proposed Site Section BB
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- 6.4.24 As noted in the TVIA, the magnitude of the effects of buildings A, B C and D would be large. Blocks A and B would be viewed at oblique angles. However, the impact of blocks C and D would provide direct views for properties 10 to 30 Westbere Drive. The TVIA notes that the proposed development would be a marked change from the existing two storey properties in the vicinity of the site but that it should be noted that the Landsby development to the west of the site contributes to a changing scale of building in the local area. This is acknowledged by the relationship with the Landsby building with the properties on Merrion Avenue which faces the frontage of buildings at greater distance is not comparable to the relationship of the proposal with Westbere Drive. Rear garden areas are more sensitive to impact, providing a private amenity space for residents. In this case a number of the gardens are relatively short with distances ranging to as little as 10 to up to 20 metres to the boundary.
- 6.4.25 Officers considered that the impacts of blocks C and D would be exacerbated by the impacts of the podium car park. In considering the proposals at the pre application stage, the Design Review Panel considered that although moving the parking underground was an extremely positive move it was important that the impacts were not displaced towards the neighbours. The podium car park would be elevated above the rear boundary next to the back gardens. In places the height of the podium and balustrade raise to 3.4 metres high and also include a maintenance staircase which would be 4.27 metres high.



6.4.26 Although there is existing and proposed planting along this boundary, the Council Landscape architect considers that this proposal is unrealistic in light of the narrow width of space at about 1.3 metres wide and that the retention of any existing planting would not likely be possible during construction. The impacts of the podium add to the oppressive, hard edge condition and unneighbourly relationship of blocks C and D.

Architectural Quality and Appearance

- 6.4.27 The proposed buildings, by virtue of their height and siting, would be visible from a number of viewpoints within the locality. The applicant has given considerable thought to the proposed elevational character and architectural detailing with the aspiration to create elevations using materials which relate to the surrounding residential buildings including the locally listed Stanmore Station and the Kerry Avenue Conservation Area.
- 6.4.28 The accompanying Design and Access statement outlines that the two buildings closest to Stanmore Station have sought to respond to the station and modernist buildings of the Conservation Area through their materiality and design. They would be brick buildings with punched openings and corner windows and would incorporate raised sill heights to both windows and balconies. Buildings C and D would have windows with Juliet railings that are paired alongside semi projecting balconies with metal railings. The design and appearance results in regular rhythm and vertical expression when viewed from the street.
- 6.4.29 The second character area would comprise the three storey terraced houses. The houses are proposed in red brick in order to try and relate back to the typical metroland housing found in the vicinity. Cut outs to the top floor and the use of light metal cladding express the roof form and help provide rhythm to the street.
- 6.4.30 The woodland villas at the south of the site within the character areas would be comprised of brickwork, generous glazing with metal railings to windows and balconies and clearly expressed ground floor entrances. The buildings are rotated in relation to each other in order to frame the public realm at the front. Projecting balconies and the use of glazed brick work are proposed and would help animate the facades. The detailing of the metal work and ground floor materials is proposed in response to Metroland architecture.
- 6.4.31 In relation to building A, the vertical and horizontal brickwork is highly successful in creating a rich texture to the façade. Although it is considered the recessed stacked corner balconies have limited success within the elevation. The northern elevation of building A incorporates a dual angle elevation which is particularly successful in mitigating the flank massing. Buildings B, C and D have high quality brick and metalwork treatments, with a particularly rich quality to entrance vestibules which benefit mansion block typologies. Buildings F to H would also be finished in high quality brick work and the use of contrasting glazed work will have provide an attractive appearance. Officers consider the use of balconies on block H are particularly successful. As noted elsewhere in this report the design of the scheme has gone through extensive pre application engagement with an external Design review Panel who were supportive of the overall architectural approach and design of the scheme.
- 6.4.32 The proposed detailing of, bricks window reveals, inset and projecting/inset balconies has been well considered. The high-quality design of the proposed buildings, the use of brick, which is contextually appropriate, and architectural detailing such as large windows and the use of varying brick colours will provide a visually attractive development. The reference in the design to the Metro-Land

architectural history of Harrow and mansion blocks in west London through the emphasis of architectural features, helps ensure an appropriate response in terms of the adjacent residential and Metroland character areas to the east and west. However, in officer opinion, the proposed design and materiality is considered to be less successful in relation in its response to the Kerry Avenue Conservation Area which is discussed in more detail below.

- 6.4.33 In the event that approval is given, the final choice of materials and the details described are critical to achieving the high-quality finish that has been promised. It is therefore considered that the materials and other detailed aspects of the design, as set out in the Applicant's Design & Access Statement, should be controlled by conditions of planning permission to ensure the development maintains its attractiveness over the lifetime of the development. In addition, in officer's opinion it is considered necessary to include in the section 106 Planning Obligation an architecture retention clause, to ensure that the quality of the architecture and finish would be preserved through all phases of development including delivery on site. This could be achieved through an agreement on the level of architectural expertise retained throughout the construction phase or a design code.

Townscape and Views

- 6.4.34 Townscape refers to the landscape within the built-up area, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces. A Townscape and Visual Appraisal (TVIA) produced by Landscape Visual has been submitted with the application. This uses qualitative and quantitative methods to consider the principal effects of the development on townscape and views found within a 0.3km radius of the application site.
- 6.4.35 In setting out the evolution of the surrounding townscape, the submitted TVIA notes that the townscape of the surrounding area developed after the new Metropolitan Underground (now Jubilee line) terminus was completed in 1932. The modernist houses within the Kerry Avenue Conservation Area were constructed between 1934 and 1937. The report notes that the visibility of the site from the surrounding area is generally limited to the immediate context, due to the topography, surrounding townscape features and limited public access. The site is located in a cutting and is visible from the station platforms to the west of the site and filtered views from the adjacent residential properties on Westbere Drive to the eastern site boundary. The site would also be visible from the residential properties located on Merrion Avenue to the west. The report considers that there would be limited views to the site from the Kerry Avenue Conservation Area due to the presence of mature trees. In the wider context there are limited glimpsed views of the site visible along the railway line from Howberry Road entrance to Canons Park and from Snaresbrook Avenue which runs south of and parallel to London Road.
- 6.4.36 In terms of the surrounding identified character areas, Table 4.1 of the TVIA considers their respective quality and value (using the methodology detailed in the report). Kerry Avenue Conservation Area are considered to have a medium

to high value, while the adjoining Metroland Merrion Avenue to the west and Westbere Drive to the east are deemed to have a medium to low value.

- 6.4.37 The TVIA considers thirteen different viewpoints, utilising accurate wirelines and block-rendered visuals to inform the townscape and visual appraisal. The Appraisal notes that at viewpoints 1 and 4 (within the immediate setting looking east and west along London Road) the proposed buildings would be prominent additions to the street, outlining the magnitude of the visual effect to be medium to large. The report considers that in these views the addition of high quality architecture and carefully conceived apartment blocks the view would be positive.
- 6.4.38 In relation to the Kerry Avenue Conservation Area (Viewpoints 7 and 8), the report notes that the proposal would be a distinct addition to the view, adding two high quality buildings of varying heights to the skyline and would contribute to a continuing change in townscape character when considered cumulatively with the Landsby building. It considers the proposal would respect the principal geometry of the conservation area and would combine effectively with the Landsby development to frame the main axis through Kerry Avenue. The report goes on to acknowledge that the development would result in a reduction of open views to the wider context to the south and east which form part of the suburban townscape to the Conservation Area and increasing influence of residential apartment buildings of taller scale and massing than the existing buildings. It considers that a contrasting brick colour and type between buildings A and H may assist in reducing the combined mass of the two tallest blocks from view within the Conservation Area. The TVIA concludes that the proposal would have a large magnitude visual effect on the distant from the Conservation Area to the south east in particular but overall finds that the addition of high quality, carefully conceived apartment buildings to the view would be positive.
- 6.4.39 In terms of the impacts on the locally listed Stanmore Station, the TVIA concludes that the offset of building A from London Road retains the building line set by the existing Stanmore Station building but would retain its prominence. In views from the east, it outlines the proposal would increase the exposure of the station building in views which would be positive.
- 6.4.40 The TVIA outlines that large magnitude effects would occur from the residential Westbere Drive properties (viewpoints 10 and 11) directly to east of the site. The report outlines, the proposal would be a distinct addition to the view, adding a sequence of high quality blocks to the local townscape. The proposal would result in a reduced suburban townscape character, with the skyline beyond the suburban housing defined by residential apartment building of taller scale.
- 6.4.41 Overall, the TVIA concludes that the proposal would make a beneficial contribution to the local townscape character and would have a largely positive. It outlines that in terms of scale, the proposed would be a bold change in terms of local townscape but that the viewpoints considered indicate that while there would be marked changes locally, the proposal responds effectively to local townscape to accommodate this change.

- 6.4.42 In officers opinion, setting aside heritage considerations, the change to the townscape character would be acceptable in some views (viewpoint 1 London Road, opposite Morecambe Gardens and viewpoint 4 London Road at the junction with White House Drive). The scale of building A would respond reasonably well to the scale of the Landsby building. It is also considered that the townscape character would respond positively in views from the south on the approach towards the station. In general, it is accepted that although the proposal would introduce townscape impacts of large magnitude, the application site is capable of accommodating a development of distinct character with a greater density and scale to the surrounding residential areas. However, as discussed above it is considered that the proposal would result in adverse townscape impacts in respect of views to the east of the site with regards to buildings B and C which don't respond positively to the two storey residential character of the properties in Westbere Drive, taking account of the limited distance between building and the proposed orientation. In addition, it is considered that the proposal would be harmful to the setting and character of the Kerry Avenue Conservation Area and locally listed station which is discussed in more detail in section 6.5 below.
- 6.4.43 The proposed development would not be within a landmark viewing corridor or the wider setting consultation area (as detailed in the Harrow Policies Map). Consequently, the proposed development would not have a harmful impact on the protected views and their landmark elements as set out in the relevant policies.

Tall Buildings

- 6.4.44 Policy D9 (Part A) states that "Local Development Plans should define what is considered to be tall for specific locations and this should not be less than 6 storeys or 18 metres". Therefore, when plan making, local planning authorities should identify and set their own definitions of what would constitute a tall building within their borough and further, within specific areas. Although it predates the London Plan (2021), the London Borough of Harrow has set out a definition of a tall building within the Harrow Core Strategy (2012). This states at paragraph 5.15, that a taller, landmark buildings is any building at over 30 metres high.
- 6.4.45 Part B of policy D9 sets out that boroughs should determine if there are locations where tall buildings may be appropriate form of development and that these identified areas should be shown on maps within the Development Plan. It states that tall buildings should only be developed in locations that are suitable in Development Plans. Currently the development plan for Harrow identifies the Opportunity Area of Harrow and Wealdstone as being appropriate for tall buildings but it does not prohibit tall buildings coming forward in other locations. Paragraph 4.7 of the Harrow Core Strategy states that "Windfall proposals for tall, landmark buildings will be assessed in relation to the planning decisions criteria set out in London Plan (2016) policy 7.7 which has now been superseded by policy D9 of The London Plan (2021).

- 6.4.46 There are two buildings within the proposed development at Stanmore that are considered to be tall, this includes building A, fronting Station Road and building H which is located in the far south of the site. Proposed building A at the front of the site is the tallest building at 11 storeys. Building H forms part of the 'villa' typology at the end of the site and creates a bookend to the site at 10 storeys.

Impacts

- 6.4.47 A range of long, intermediate and mid-range views of the development site from the surrounding locality are provided in the Townscape and Visual Impact Assessment and the Design and Access Statement which is discussed above. In respect of intermediate views of building A it is acknowledged that following close scrutiny of a Design Review Panel and a number of improvements were made to improve the appearance of the building. This included the introduction of larger glazing areas to add more vertical expression as well as a substantial plinth and clearly expressed top to the building. Greater articulation was incorporated into the facades through the introduction of brick pier, concrete panels and recessed windows.
- 6.4.48 It is considered that the tall buildings on the site would assist in reinforcing the spatial hierarchy of the local area and aid legibility and wayfinding. Building A would mark the entrance to Stanmore Station, a key transport interchange being the terminus of the Jubilee Line. It is considered that Building A in conjunction with the adjacent Landsby building would act as a strong visual presence aiding legibility and wayfinding. Building H marks the end of the site and provides a strong visual cue of the approach to Stanmore in views approaching from the south. Due to the level difference from north to south across the application site, building H is less visible in key views and would be a sufficient distance away to avoid the creation of a cluster of tall buildings.
- 6.4.49 The application is accompanied by detailed architectural drawings and in order to help lock in the aspirations for material and design quality. As set out above and when considered in isolation from impacts on designated heritage assets, the architectural quality and design response is well considered and in the event that approval is granted would be subject to a condition to secure final material finishes and an architectural retention clause (secured through section 106) to ensure the design quality promised in the application is delivered.
- 6.4.50 With regard to policy D9 C (d), this outlines that proposals should take account of and avoid harm to the significant of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh the harm. This is discussed in detail in section 6.5 of the appraisal below. In summary, it is considered that the proposal fails to comply with this policy requirement in respect of Building A which is considered to be harmful to the setting of the Kerry Avenue Conservation Area and Locally Listed Station. Moreover, officers consider that the purported public benefits do not outweigh the harm that would be caused. The LPA have sought to engage with the applicant during pre-application stages and during the application and suggested alternative massing options could be explored across the site (for

example additional massing at the rear) to reduce the impacts on the heritage assets but this has not been pursued.

Functional and Environmental Impacts

- 6.4.51 The application is accompanied by a solar glare assessment in order to demonstrate whether any solar reflections from the proposed buildings would be visible from sensitive viewpoints which may impact on road users and train drivers of the adjacent railway. Overall the assessment finds that there will be some solar reflections given off the proposed building facades which may be visible by some road users and train drivers but these instances are unlikely to create any significant adverse instances of solar glare as they will only be small in size and occur for a limited period of time. The proposed tall buildings are therefore considered to be acceptable in this regard.
- 6.4.52 Policy D9 requires that tall buildings should be designed to minimise light pollution from internal and external lighting. The application is accompanied by an external lighting assessment which seeks to be sensitive to the SINC and also ensuring a safe and secure development. Lighting would be installed which includes glare and light spill controls to minimise light pollution from the development. The external lighting strategy has been reviewed by the Council's lighting engineer who has raised no objections to the details submitted. It is therefore considered that the external lighting strategy is acceptable to protect the local character of the area, residential amenity and the wider public realm from light pollution. It is noted that no specific details have been provided in respect of the internal lighting of the building and how this would be managed. It is considered that final technical specification of proposed lighting, lighting control, including operational hours and lighting plan as well as details of internal lighting could be required by planning condition, in the event that planning permission is granted.
- 6.4.53 The application is accompanied by a fire strategy which covers all proposed buildings across the site. This details emergency exit routes to ensure the safety of all occupants. Moreover, the building is not proposed to be fire clad.
- 6.4.54 The fire strategy has been referred to the Council Building Control department. As set out in the consultation responses section of this report, the fire strategy is considered to be deficient in a number of areas and is unacceptable, failing to meet the policy requirements of D5 and D12 of the London Plan. In order for these deficiencies to be addressed, officers consider it would be appropriate to secure a revised fire strategy by planning condition to ensure the high standards of safety as required by the London Plan are achieved.
- 6.4.55 The application is supported by a detailed Delivery and Servicing Management Plan. It is proposed that all deliveries and waste collection associated with the residential development will take place via the internal site access road. The internal access road includes four designated inset loading bays which are adjacent to the residential cores for buildings A to D. In relation to the buildings to the south, including the townhouses all delivery vehicles would be able to stop on the access road for servicing. Refuse collection vehicles will be able to stop

alongside the waste stores of each block within 10 metres of the vehicle. Step free access would be provided from the vehicle from all waste stores. The Council's Waste and Highways department have raised no objections with regard to refuse collection or proposed servicing arrangements.

- 6.4.56 The proposal is accompanied by an Inclusive Access Statement which demonstrates principles of how well-designed access routes and accommodation have been incorporated. Dwelling entrances are all generally clearly signified through design recesses, distinct entrance door materials and external lighting. An easy going stair and a part M compliant lift would provide vertical circulation in all apartment buildings. Internal circulation spaces are considered to be sufficiently spacious and will benefit from good levels of natural lighting.
- 6.4.57 The site location benefits from access to walking and cycling facilities as well as public transport provision by buses and London Underground. The Transport Assessment (TA) submitted shows, as expected, that this development has the potential to reduce the current number of car journeys associated with site as the car park capacity would be reduced and the residential element would generate very few car journeys. The residential development would increase public transport use however the TA includes an assessment of public transport impact that shows that there is sufficient capacity. In terms of highways impact, the proposed development is expected to result in a reduction in car trips and an increase in trips by other modes. The principle of a residential development is considered to be feasible for this site, subject to the provision of appropriate mitigation measures to improve walking and cycling which could be secured by section 106 agreement in the event that planning permission is granted.
- 6.4.58 The proposed development would introduce a generally well considered housing development onto an underutilised brownfield site and would thereby act as a catalyst for further regeneration benefits to the area. The proposed development would likely give rise to significant employment opportunities during the construction phase of the development which could be secured through section 106 agreement.
- 6.4.59 The proposal would not give rise to any negative impacts on aviation, navigation or telecoms as a result of the proposal. The application has been referred to the Ministry of Defence who have confirmed they have no objections to the proposed building heights, subject to a condition in relation to a Bird Hazard Management Plan, in the event that planning permission is granted. An assessment of the proposals was also undertaken by NATS Safeguarding to ensure that the development proposals would not impact on Primary or Secondary Radar at Heathrow Airport. It was found that the scheme would not impact upon radars at Heathrow Airport.
- 6.4.60 The planning application is accompanied by detailed assessments for wind and microclimate performance, daylight and sunlight impacts and noise and vibration impacts. The wind report finds that wind conditions would be expected to be suitable for all intended purposes. There is a requirement for some mitigation at balcony level on Building A which would ensure no adverse impacts to future occupiers and could be secured by condition in the event planning permission is

granted. The wind and microclimate assessment is being independently reviewed and any further comments on this will be reported via the committee addendum. In relation to the Daylight and Sunlight Assessment, this has been independently reviewed and overall officers are satisfied that the impacts would be acceptable. The noise and vibration assessment concludes that there would be no vibration mitigation required on site. In terms of noise, although there would be some exceedances of appropriate noise levels, it is considered this could be mitigated through design measures and secured by condition should permission be granted.

- 6.4.61 The Landsby building is located on the west side of the development and is the only other tall building within the vicinity of the site and has been taken into consideration in the relevant assessment submitted with the application and discussed throughout the appraisal. Although there would be no significant adverse cumulative functional or environmental impacts, the visual impact of Building A, by reason of its height, design, scale and bulk would detract from the adjacent designated heritage assets unlike the Landsby building which provides an acceptable response.

Public Realm

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

Lifetime Neighbourhoods and Secure by Design

- 6.4.63 Occupiers of the proposed flats would benefit from close proximity to the shops and services available within Stanmore District Centre, and those elsewhere, via public transport routes serving Stanmore Station. Furthermore, the proposal would enhance the public realm, thereby improving the pedestrian and cyclist experience as well as providing step free access from to the platform level of Stanmore Station, for both those accessing the site from the car park as well as at the station level.
- 6.4.64 The Metropolitan Police Secure by Design Officer was consulted during the application and raised concerns in relation to the use of the proposed public realm seating area adjacent to the station. It was considered that this area had significant potential to result in additional crime and antisocial behaviour, being a main drop off point for events at Wembley. The applicant has therefore removed the seating areas to address this concern which has been accepted by the SBD officer. Although this would be detrimental to the proposed public realm area

proposed, on balance it is considered necessary to ensure a safe and secure environment and an attractive public realm area can still be achieved. Further concerns have been raised in relation to the provision of secure postal lobbies to ensure that there are sufficient controls in place to prevent people, other than residents from accessing the core, without check. Further comments on this have been sought from the applicant and will be provided via the committee addendum. The SBD officer has also pointed out that the gardens between blocks B, C and D should be subject to a management strategy to prevent the areas from becoming anti-social crime hotspots. In the event that planning permission is granted, pre-occupation condition could be secured in respect of this element in addition to a condition to ensure the proposal achieves Secure by Design Accreditation.

Summary

- 6.4.65 Officers acknowledge that a large number of residents have raised an objection to the scale of the development, noting that it would be out of keeping with the suburban character of the locality. Furthermore, responses to the public consultation have also taken issue with the design, architectural treatment, siting and proximity of the building to neighbouring properties. Officers acknowledge that the proposal would create a change in impacts to the townscape. However, as set out above, it is considered that the proposal would introduce high quality architecture, materials and public realm to the site. The proposal has undergone robust design scrutiny and various experts in the design field, have concluded that the scale and height would not cause detriment to the urban context of the area.
- 6.4.66 Officers accept that large sites such as this should not be ruled out from defining their own setting and accommodate higher densities' than the surrounding area. Nevertheless, this needs to be done in a sensitive manner in terms of providing an appropriate transition of scale and massing in relation to the immediate surrounding context. It is considered that the proposal fails to have sufficient regard to its surrounding context, in respect of the lower scale two storey residential properties to the west, specifically in relation to blocks C and D, as well as the Kerry Avenue Conservation Area and Locally Listed Station. It is considered the proposed blocks would give rise to an overly dominant and overbearing scale and massing in relation to the two storey residential properties in Westbere Drive. The impacts in relation to the designated heritage assets are discussed in more detail in the section below. Overall, for these reasons, officers consider that the proposal would have an unacceptable impact on the character and appearance of the area, contrary to the above outlined policies.

6.5 Heritage Assets

- 6.5.1 The relevant policies are:
- National Planning Policy Framework (2019)
 - The London Plan (2021): HC1
 - Harrow Core Strategy (2012): CS1D
 - Harrow Development Management Policies (2013): DM7
 - Kerry Avenue Conservation Area Appraisal and Management Strategy

- Historic England Good Practice Advice in Planning Note 3: The setting of heritage assets

6.5.2 The site lies within the wider setting of the Canons Park Conservation Area and Grade II registered park and Garden. However, it is accepted to be too far distant application site to have any heritage impact. The site is also within the immediate setting of the Kerry Avenue Conservation Area. The special character and appearance of the conservation area is outlined by the Kerry Avenue Conservation Area Appraisal and Management Strategy (CAAMS) which states:

- The area is 'the 'earliest domestic group in west London to adopt the principles of the modern movement' (Pevsner and Cherry, *London 3: North West*, 1991).
- 'The greenery is integral to the philosophy behind the construction of the estate which ...was in line with the Garden Suburb ideal of the time. The semi-rurality is heightened by...the gently rising gradient which gives way to extensive views east and south, altogether, there is a high quality of area'
- 'The establishment of Stanmore Station in 1932 gave an axial setting for this linear road arrangement...The area's plan form is important ... The manner in which this has been constructed and stocked suggests the skilled attention and thoroughness of a long established garden.'
- 'The gradient is vital to the character of this area as the feeling is one of gradually travelling up into the countryside as suburbia fades away...From the highest point at the entrance to Stanmore County Park, the view back down Kerry Avenue is a very attractive one of the railway disappearing into the distance beyond the trees'.
- 'Stanmore Station provides a visual stop at the southern end of the main axial heart of the area, terminated at the north by open countryside. The station is very important to the CA as it gives context and reason for the layout of the estate'.
- The 'grassed and landscaped area in front of the station is important as it forms part of the historic, formal and symmetrical layout of the estate, and helps complement the traditional nature of the design'.
- 'Especially important to the area are the long distance views looking out to the east and the views of the railway line to the south, which remind the onlooker of the historical catalyst for area's development. The retention of this view is particularly important.'
- The association of the area with single family dwelling houses in medium sized plots which forms part of the special character and appearance of the area.
- The open nature of the Conservation Area should be preserved in terms of the space within it and views looking out.
- Examples of key views from the CAAMS:



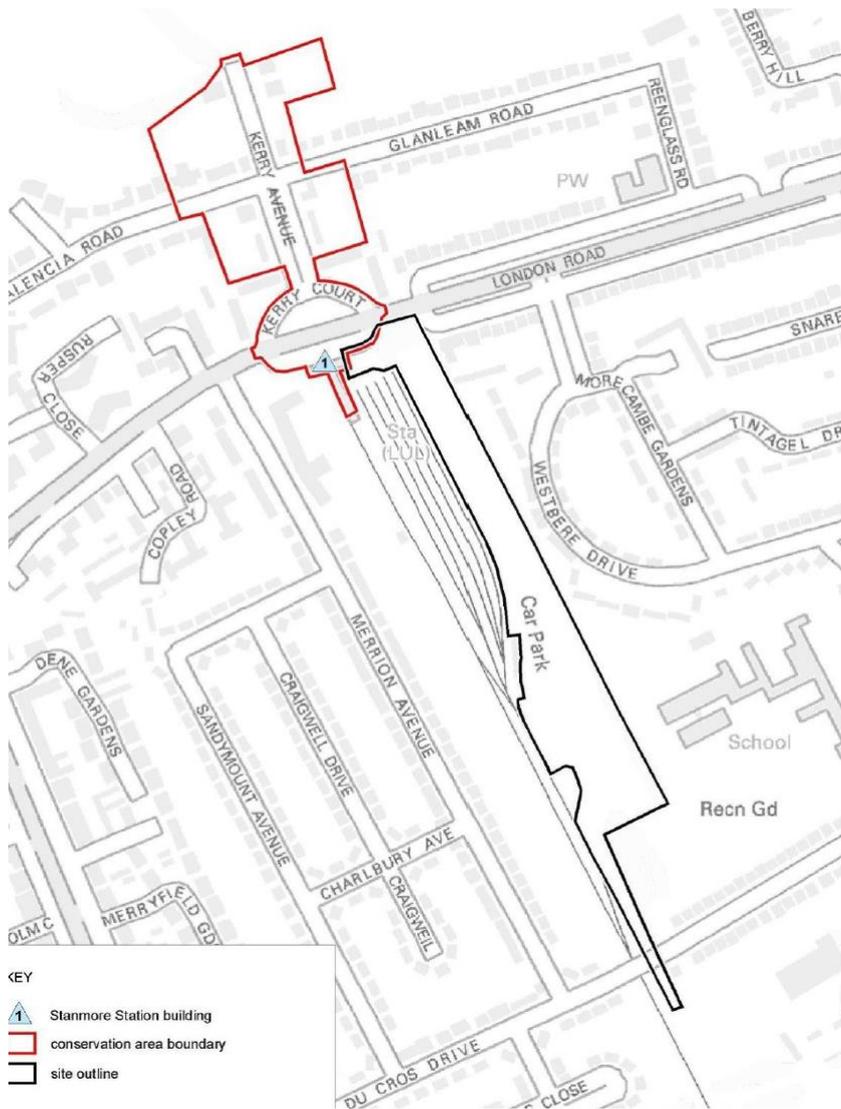
**Picture 4.71 Views towards
the Arts and Crafts style
Stanmore Station**



**Picture 4.38 View southwards
from the Valencia Road and
Kerry Avenue junction -
illustrates a good long distance
view out**



Picture 4.33 Upper Kerry Avenue creates an impression of suburbia fading away



Above: The application site is relation to Kerry Avenue Conservation Area and Locally Listed Station

- 6.5.3 The proposal is also immediately adjacent the locally listed Stanmore station (within the conservation area) which is of Arts and Crafts design and a single storey, landmark building.
- 6.5.4 The NPPF defines the 'setting of a heritage asset' as 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'
- 6.5.5 In this case, the open setting of the surroundings, including the car park, makes a positive contribution to the significance of the conservation area and positively affects the ability to appreciate its significance. This is because it helps mark a clear separation from more urban areas further away, adding to the sense of this being suburbia with a semi-rural character and integral open views all around.

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

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

- The proposed building is designed to respond to the building alignment of the station building and has a podium element which responds to the station awning in its ground floor design
- The proposed building is designed as an overall simple, modern and high quality form and addition in the streetscape, with a ground floor podium and upper levels set back above, whereby reducing the overall bulk and scale of the development. It will be a neutral addition in the setting of the station which retains the prominence of the station.
- There is a substantial set back of 32 metres retained between the station building and the proposed building which retains the prominence of the station building
- The proposed scale of the new development responds to the higher scale of the existing 8 storey development currently in construction to the west of the station; will frame the vista to the station from Kerry Avenue.
- The proposed green verges and landscaping to the edges of the site will be retained, which contributes to the quality of landscaping and greenery in the Conservation Area.
- The quality and character of the station is appreciated from within its immediate setting (in the round of Kerry Court). Principal Views to the stations frontage will be wholly retained by the proposed development.
- Views to the station are appreciated from the round of Kerry Court where its principal façade, scale, features and details are apparent and appreciated. Distant views along London Road to the station are of lesser importance and to secondary elevations only. Further, the setback of the station from London Road denotes it was not intended to be readily apparent in distant views from London Road.
- Improvements to the public realm with a pedestrianised area and planting around the station area are considered an enhancement and will create greater appreciation of the station and support its use/function with a ground floor active frontage
- The quality and presence of the Station building, with its prominent hipped form and historic detailing will continue to be appreciated and prominent in the setting despite the addition of a larger scale development.

- The proposed development does not impact on the ability to interpret the special character features and consistency of the streetscape within the conservation area.
- The site is too far distanced from Canons Park (Grade II Registered Park and Garden) and Canons Park Conservation Area for there to be any heritage impact.

6.5.8 Overall, the report concludes that the proposed development is considered likely to have 'less than substantial harm' to the setting of the identified heritage assets, due to the scale of the proposed development (with the present car park currently contributing to openness). It sets out that the harm is at the lower end of the threshold and outweighed by the significant public benefits of the proposal. The report contends that the sympathetic and high-quality design response of the proposed development should be considered together with the significant public realm improvements around the station. The following public benefits have been forward as public benefits which would outweigh the identified harm:

- Delivery of 277 Affordable housing units at a policy compliant mix, providing London Affordable rent and Shared Ownership Properties
- Provision of Step-Free access to Stanmore Station, improving significantly on the current step-free arrangement.
- Provision of a landscaped area of public realm adjacent to the locally listed station to enhance the locally listed building and to create a link to opposite the Conservation Area.
- Implementation of a Biodiversity Management Plan to enhance and improve the quality of the adjacent SINC land – development creates the opportunity to manage the SINC.
- The delivery of circa 150 space cycle hub within the red line boundary of the site. The cycle hub will be provided and the existing car parking spaces reduced which will contribute to the wider sustainability aspirations of the Borough and the GLA.
- High quality public realm and landscaped areas throughout the site.

6.5.9 A series of verified views were undertaken and are provided within the Townscape and Visual Assessment. The relevant heritage views are identified as views 4 and 12.

Views 4 and 12



Above View 12 – Key View East along London Road



Above: View 8 – View from Kerry Avenue at junction with Valencia Road

- 6.5.10 The Heritage Assessment provides commentary on the verified views. In respect of viewpoint 12, the proposed new development will be seen in the back drop of the station building in the view east along London Road. The report considers that the station, with its prominent hipped roof, will continue to be prominent within the view from this aspect. It is outlined that the proposed new development will be consistent with the recent development to the southern side of the station and will therefore not appear out of place.
- 6.5.11 In relation to view 8, it is suggested that the proposed new development is situated to respond to the symmetrical layout and formal plan form of the conservation area. The Heritage Assessment considers that although the proposed new development will be visible in the views along the high point of Kerry Avenue to the station (due to the scale of the proposed development), the proposed new development will frame the view, together with the existing recent new development on the west side of the station (the Landsby building). It is outlined that the proposed new development is consistent with the higher scale of the recent new development and as such will not dominate views from the conservation area from this aspect. Additionally, it is stated that the that the key

vista would be retained to the open space beyond the station due to the sympathetic positioning of the proposed new building.

- 6.5.12 Overall, the Heritage Statement considers that the proposed development is considered to have ‘less than substantial harm’ to the setting of the identified heritage assets due to the scale of the proposed development (with the existing car park currently contributing to openness). However, the Heritage Statement considers that the harm is at the lower end of the threshold and outweighed by the significant public benefits of the proposal. This would include the delivery of 277 affordable housing units, the delivery of a cycle hub and high-quality public realm as well as step free access to Stanmore Station, and mitigate the level of harm. The report also considers that the design response is high quality and should be taken into account.
- 6.5.13 The application was referred to the Council’s Conservation Officer who has reviewed application and supporting documents. The key points raised by the Council’s Conservation Officer are discussed below.
- 6.5.14 The special character of the conservation area relates to it being a particularly early group of domestic Modernist suburbia, built on a symmetrical layout and the philosophy of the Garden Suburb ie plentiful integral and surrounding openness to provide a sense of separation from more urban areas.
- 6.5.15 As such, the open setting of the car park site immediately adjacent Stanmore Station helps contribute to this special character and appearance. It helps mark a clear separation from more urban areas further afield and adds to the soft suburban character of the area with open views all around.
- 6.5.16 As per pre-application advice, building A would harm the setting of the conservation area due to its scale (bulk, design and height) in this siting. The height and bulk here, over and above that recently approved on the extended building on the equivalent opposite side of the station, intrinsically conflicts with this characteristic openness and intended sense of separation of this conservation area from more built up areas beyond. Therefore, it would conflict with the heart of one element that contributes to the special character and appearance of the conservation area.
- 6.5.17 In the opinion of the Conservation Officer, the block’s form and hard edged design does little to overcome or mitigate the harm, closely resembling as it would, a bulky 1960s tower block rather than referencing the design character of the conservation area with Modernist Metroland and Art Deco characteristics. Instead the brutalist, urban tower block style that is proposed clashes with the special character and appearance of the conservation area. This is in contrast to the building on the other side of the station whose recently approved extensions do reflect the special design character of the conservation area.



Above: Proposed building A west Gable

- 6.5.18 In officer's opinion, the height and bulk would also sit in stark contrast to the recently approved and built extensions on the equivalent site immediately on the other side of the station facing London Road. That building is set further back than this proposal and is to be just 7 stories high, with a stepped design and the top storey in particular set well back (compared to the 11 proposed here plus equipment on level 12) and a much broader floor area on every level. Given the vast height and bulk of the new building proposed, this would be strikingly out of keeping with the symmetry that largely characterises built form within and in the immediate vicinity of the conservation area.
- 6.5.19 Building A on London Road has been slightly set back but this is insufficient to provide a good setting and a sufficiently wide soft landscape/ public realm to be in keeping with the existing generous, wide existing landscape frontages around Stanmore Station area and Kerry Avenue Conservation Area. This undermines the Garden suburb character of the conservation area. Also, again through the proposed siting building A does not provide symmetry with the building on the other side of the station and so again does not respond to the symmetry of the conservation area.
- 6.5.20 The scale of the building also harms the character of the station as the landmark building, as a single storey Arts and Crafts character station that is the centre point of the conservation area and signals its origins as Metroland. The increased buffer distance of 35 metres between buildings compared to the Landsby building which has a distance of 16 metres from the station is noted but the larger the scale compared to the building on the equivalent site on the other side of the station, the more its landmark character is reduced. Moreover, the Landsby building is set further back from the station building line which helps ensure the focal point of the station as entrance to the conservation area is retained.

- 6.5.21 It is accepted that the level of harm of the proposal in relation to the heritage assets is less than substantial since the bar for substantial harm is very high, but the harm would nevertheless be significant as it would cut at the core of one element that contributes to the special character and appearance of this conservation area ie the sense of openness and separation of this Garden Suburb domestic suburbia conservation area, from more urban areas further afield. It would be highly visible in many views into and out of the conservation area.
- 6.5.22 The NPPF states in paragraph 193 that: ‘When considering the impact of a proposed development 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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance’.
- 6.5.23 Paragraph 194 states: ‘Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification’
- 6.5.24 Paragraph ‘196. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use’.
- 6.5.25 Therefore, any harm needs to be avoided wherever possible.
- 6.5.26 The Conservation Officer considers that there is no clear and convincing justification for the additional stories that cause the harm here and the limitations of the supporting information are:
- There is reference to overall public benefits of the scheme but it has not been demonstrated that the units on block A that cause the harm are a necessity of the scheme and could not be re-sited elsewhere in a rejigged form of a proposal.
 - The design and access statement incorrectly states the accompanying heritage statement does not identify any harm but it identifies less than substantial harm.
 - As the Townscape and Visual Impact statement notes – the visual effect of building A would be large.
 - The heritage statement does not address some of the key views in the townscape and visual impact statement that illustrate the impact this proposal would have on the setting of the heritage assets ie it does not refer to all views apart from viewpoint 8 and 12:

Viewpoint 4 London Road at the junction with White House Drive.



Viewpoint 7 Kerry Avenue northern section



Viewpoint 8 Kerry Avenue at junction with Valencia Road



Viewpoint 12 Kerry Avenue



6.5.27 It is considered that the above images illustrate the harm listed above, particularly viewpoint 7 and 12. The building would sit in stark contrast to the conservation area's special character based on the qualities of openness and separation from the more built up areas further away. Indeed the CAAMS

specifically states: 'The open nature of the Conservation Area should be preserved in terms of the space within it and views looking out'.

- 6.5.28 The heritage statement notes the proposal would 'respond to the symmetry of the conservation area' yet at odds with the symmetry, it would be set further forward and would be strikingly taller and much more bulky (bigger floor plan) than the building on the other side of the station. Unlike that building, it would have no soft curved edges to the building and no stepping to levels to reduce bulk to ensure it sits in more seamlessly with the open setting of the conservation area.
- 6.5.29 The heritage statement notes in view 12 the building would 'frame the view' and is 'consistent with the higher scale' of the development on the other side yet view 7 clearly shows that rather than achieving either of these things, it would stand out as a much bulkier addition out of keeping with existing built form and harming the important open setting of the conservation area and good views out.
- 6.5.30 Reference is made to the building not blocking key views but the map of key views in the CAAMS is not exhaustive and the CAAMS specifically refers to the need to preserve the open views out of the conservation area.
- 6.5.31 It is unclear how the design proposed relates strongly to that of the conservation area. The recently constructed building on the other side of the listed station at least incorporates an Art Deco / Modernist design element that help tie the building in with its Modernist Metroland surroundings.
- 6.5.32 Historic England, the government's statutory advisers on heritage, were consulted on the application. The consultation response received on 18th June 2020 detailed that they did not wish to offer any comments, and suggested the local planning authority to seek the views of their own specialist conservation advisers, as relevant.
- 6.5.33 As discussed in the submitted Planning Statement, the applicant had separate pre application discussion with Historic England, prior to the submission of the application. The applicant outlines that the response received from Historic England concluded that the proposed development would cause a degree of harm to the setting of the Conservation Area but would not impact upon what was important about the area. Moreover, it is highlighted, the response from Historic England stated that the harm caused by the proposals should be weighed against the public benefits.
- 6.5.34 It should be noted also that officers have not seen the proposals that Historic England commented on, nor the full response from them so cannot respond fully on this point. However, even the selected comments listed within this statement note that this proposal would harm the setting of the conservation area by the encroachment of a more urban built form.
- 6.5.35 It should also be noted that the Conservation Area Advisory Committee (CAAC) have also raised an objection to the proposal. In particular, the CAAC have advised that the eleven storey block at the north end of the site will dominate and overshadow the Arts and Crafts style, Locally Listed, station building, its

landscaped forecourt, and Kerry Court which is the original open entrance to the 1930's residential estate and the CA. This block also obscures the station building and forecourt from views looking east along London Road which in effect is the gateway to Stanmore and the CA from this direction. It is also outlined that the architectural treatment of the development is not sympathetic to the character of the architecture of buildings within the CA, or local area, and will not enhance the setting of the CA as required by the Appraisal and Management Strategy. Officers concur with the view of the CAAC in this regard.

Public Benefits v Harm

- 6.5.36 As outlined above, the applicant sets out that the less than substantial harm is outweighed by the significant public benefits of the scheme. These public benefits outlined are discussed in detail in the relevant sub section of this report but are summarised below.

Delivery of 277 Affordable housing units

- 6.5.37 The proposal would offer 277 units, all of which would be offered as affordable housing. 40% of the units would deliver a policy compliant tenure split which is acceptable. However, beyond the 40% policy compliant offer, the proposed units are weighted heavily to a tenure that there is not a substantial need for, being Shared Ownership and therefore results in a much lower quantum of London Affordable Rent, which there is an evidenced need for, and which offers much more in terms of alleviating homelessness within Harrow and wider London. Notwithstanding the imbalance in tenure, it is also noted that a significant number of the Shared Ownership units (2bed and above), would not be affordable to Harrow residents, when compared to the Harrow average household incomes. The additional rental discount proposed by the applicant on the 3 bed Shared Ownership Units would offer limited benefits overall to mitigate the overall quantum of units in this tenure as a total of only 7 units is proposed.
- 6.5.38 It should also be noted that the Council will receive no CIL from the development's housing which is clearly a negative against the 100% Affordable Housing offer, where most of the Affordable Housing offer is in a tenure that doesn't reflect the boroughs priorities and is not particularly affordable, but still has an impact on social infrastructure such as schools / health. In officer's opinion this further undermines the planning balance. In the absence of CIL receipts the Local Planning Authority can't seek to mitigate the impact of the development on health / education as those are covered by CIL and it's the cumulative impact of the developments on infrastructure (normally funded by CIL) rather than a site / proposal specific impact (covered by S106).
- 6.5.39 As such, the weight that can be afforded to the 100% affordable housing offer in the broader planning balance is low by the fact that the 'additional' affordable housing offer above that required by Harrow's Local Plan is of a tenure for which there is a lower identified need for.

Step Free Access

6.5.40 The Site Allocations DPD sets out that for the subject site H10 that the redevelopment of the site should provide for an improved alternative disabled access both from the principal station building on London Road and from the replacement car parking facility. Sufficient disabled access is required due to the significant fall in site levels away from London Road which bounds the site to the north. The proposed TFL step free lift would be located within building A at the front of the site and would provide level access from the front of the site at Station Level (London Road) down to the platform level. It would also provide level access from the below ground car park which is considered to satisfy the site allocation objective. The provision of the lift within the scheme is positive but nevertheless it is a policy requirement of the delivery of the site allocation and therefore is only considered to be of moderate weight in the overall planning balance.

Landscape Public Realm

6.5.41 The proposal includes a new landscaped area adjacent to the locally listed station and opposite the conservation area. This would be in keeping with the existing generous, wide existing landscape frontages around Stanmore Station area and Kerry Avenue Conservation Area. However, the proposed landscaping, whilst it makes a positive contribution to the setting of the development, is a policy requirement of any major development proposal and is not considered to amount to a significant public benefit. Moreover, in officers judgement, the scale of the proposed public realm improvements are not substantial or commensurate with the scale of the overall development proposals. The propose landscape improvements are therefore only attributed very limited weight.

6.5.42 The Design and Access statement refers to the illustrative indicative potential public realm improvements outside of the redline application site, in front of the station, creating a pedestrian arrival space and continuing the soft landscape along London Road. Also, improvements to bus stands and stops and the existing TfL car park are highlighted. These public realm improvements do not form part of the planning application. The indicative ideas to make substantial improvements with a pedestrian only arrival space on the frontage of the station and the continuation of soft landscape along the London Road and The Landsby should be a serious consideration for this application and was strongly encouraged in pre application discussions with the applicant. This would have been likely to have afforded much more weight had it been put forward as part of the proposal.

Biodiversity Management Plan

6.5.43 It is outlined that provision of a biodiversity management plan will enhance and improve the adjacent SINC land and that the development will create the opportunity to manage the SINC. This again is considered to be a policy requirement for a development which is directly impacting on SINC land and does not amount to a public benefit. Moreover, for reasons, discussed in detail in section 6.8 of this report, the proposal is considered to be harmful to the biodiversity value of the site and surrounding land and would fail to provide

adequate enhancement or mitigation as required by the development plan policies.

Delivery of a cycle hub

- 6.5.44 The delivery of the cycle hub is proposed in order to help mitigate the impacts of the proposed reduction in car parking spaces. It is acknowledged that this will have some sustainability benefits but no details have been forthcoming in relation to what would be included in the cycle hub (for example will it include on site staff or other services) and at present appears as large store room. The proposed cycle hub is required to make the development acceptable in transport terms but cannot be considered as a public benefit, particularly as it is presented as just a storage facility and is not given any weight in the assessment.

High quality design

- 6.5.45 As discussed above, whilst the design response in relation to the character of the area outside of the conservation area is acceptable, it is not considered to respond sufficiently to the character of the Conservation Area. Moreover, a high-quality design is a fundamental policy requirement of any major development proposal. In respect of the Conservation Area however, the architectural form of the building and the material treatment of the development is not considered to be strongly sympathetic to the character of the architecture of buildings within the CA, and will not enhance the setting of the CA. As such, the assertion that a high-quality design response would be a significant public benefit is not accepted by officers and is afforded limited weight in the overall planning balance.
- 6.5.46 In summary, the combination of the height, design and siting of Building A would cause significant harm to the setting of the Kerry Avenue Conservation Area and Locally listed Station for which clear and convincing justification has not been provided contrary to the NPPF requirements. The harm would be caused to the open character and setting of the conservation area which is an integral part of its special character and appearance of the area as an early domestic group of Modernist Metroland built on the Garden Suburb principle and thus intended to be quite separate and semi-rural in character with open views out all around, compared to more built up areas. Similarly, its dominance would undermine the landmark quality of the station. Landscaping would not respond sufficiently to that which characterises the conservation area. Siting and scale would not respond to the symmetry of built form of the conservation area, nor the successes of the building in the opposite equivalent site of the station in preserving the open setting and high-quality design of the conservation area. When the identified harm is weighed against the outlined public benefits of the scheme, officers consider that the benefits would not outweigh the harm, contrary to paragraph 196 of the NPPF.
- 6.5.47 For the reasons outlined the proposed development is considered to be contrary to the above outlined policies.

6.5.48 It is noted that some concerns have been expressed about archaeological impact, however the development is not situated within an Archaeological Priority Area.

6.6 Residential Quality, Amenity and Accessibility

6.6.2 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2021): D3, D5, D6, D7, D13, D14
- Harrow Core Strategy (2012): CS1K
- Mayor of London Housing Supplementary Planning Guidance (2016)
- Mayor of London Achieving An Inclusive Environment Supplementary Planning Guidance (2014)
- Technical Housing Standards – Nationally Described Space Standards (2015)

Residential Quality of Future Development

Entrances and Shared Circulation

6.6.3 The Mayor's Housing SPG calls for entrances to be visible from the public realm and clearly defined. The residential entrances to the buildings would face the highway. They would be visible from and would help to activate the new public realm within the proposed development.

6.6.4 The entrance lobbies to the proposed residential flats would be generously proportioned and in accordance with the Mayors Housing SPG, each building would be served by at least one lift and there would be no more than eight residential units per floor serving the core. The SPG also encourages communal corridors to receive natural light and ventilation where possible. Building A allows for the access corridor to be served by natural light and ventilation. The configurations for the other buildings, however, do not allow for windows to serve the corridors. However, it is noted that the corridors are not excessively long and are served by a generously sized lobby for each floor. Whilst clearly not ideal, this is not considered to be unacceptable.

Internal Space Standards

6.6.5 The minimum space standards are set out within the Nationally Described Space Standards and at Table 3.1 of the London Plan (2021) and are also reproduced within the Mayor's Housing SPG. The submitted Design and Access Statement details the proposed unit typologies which would be provided within each of the buildings. All of the flats within the proposed development would meet or exceed the London Plan minimum space standards. The development would also achieve the minimum floor to ceiling height of 2.5 metres as required by the Housing SPG. The submitted drawings show that the proposed layouts would make reasonable provision for the accommodation of furniture and flexibility in the arrangement of bedroom furniture.

Daylight, Sunlight and Aspect

- 6.6.6 The Mayor's Housing SPG seeks to avoid single aspect dwellings where; the dwelling is north facing (defined as being within 45 degrees of north); the dwelling would be exposed to harmful levels of external noise; or the dwelling would contain three or more bedrooms. The definition of a dual aspect dwelling is one with openable windows on two external walls, which may be opposite (i.e. front & back) or around a corner (i.e. front and side) and the SPG calls for developments to maximise the provision of dual aspect dwellings.
- 6.6.7 All corner units within Building A and B would be dual aspect and there would only be 1 south facing, 1 bed unit per floor. All corner units within buildings C and D would be dual aspect. Although the four central units within buildings C and D would be single aspect, they would face east or west. In respect of buildings F and G, all 2 and 3 bedroom units would be dual aspect with only 1 west facing single aspect unit per floor in building G. All the units in building H would benefit from dual aspect. Overall, 100% of the amenity spaces and living rooms would face south, east or west. 65% of units would be dual aspect with views over both the railway and the new street. All single aspect units are 1 bed units and these face either south, east or west. There are no north facing single aspect units and 90% of kitchens would be served by a window.
- 6.6.8 While the provision of single aspect flats is not ideal, the respective units would all be one bed flats and would not be north facing. Every effort has been made in the design and layout of the proposal to maximise the number of dual aspect flats.
- 6.6.9 An Internal Daylight, Sunlight and Overshadowing Report produced by GIA has been submitted with the application. The report details that all habitable rooms within the proposed scheme have been tested for daylight quantity (by means of Average Daylight Factor or ADF) and distribution (by means of No Sky Line or NSL and Room Depth Criterion or RDC). In addition, all living room areas with a southerly aspect have been assessed for their access to sunlight (Probable Sunlight Hours) both annually (APSH) and in winter (WPSH).
- 6.6.10 The results show an excellent daylight and sunlight performance of the proposed development, with 99% of habitable rooms meeting or exceeding the recommended levels of daylight. 93% achieving a sky visibility in line with or above guidance and 90% of living areas with a southerly aspect offering good access to sunlight both annually and during the winter months. Overall, there would only be 10 rooms that fall below the recommended BRE. These include:
- Two bedrooms which achieve 0.9% ADF where 1% is suggested
 - Two living rooms which achieve 1.4% ADF where 1.5% is suggested and
 - Six combined living/kitchen/dining rooms which achieve the 1.5% ADF recommended for living rooms and fall just short of the 2% suggested for rooms including a kitchen.

- 6.6.11 As such the few rooms that fall short of the ADF recommendation, do so just marginally. In addition, 8 of the 10 rooms offer good sky visibility and six of the eight living areas having very good access to sunlight both over the whole year and in winter.
- 6.6.12 The report details that all daylight is generally more appreciated in living areas than in bedrooms and the development has therefore sought to prioritise light into these areas. As a result, 53 of the 58 rooms offering a lower sky visibility than recommended are bedrooms. 45 of these 58 rooms offer a view of the sky from at least half of the room area. The remaining 13 are bedrooms which achieve at least 45% NSL, which is more than half the recommended value.
- 6.6.13 Turning to the quality of sunlight within the proposed development, the report outlines that there are only six living rooms which fall short of both APSH and WPSH recommendations. The main aspect of these rooms is north facing and therefore they would have very limited expectation of direct sunlight. However, the report notes that the side windows providing access to the balconies face within 90° of due south and as such fall within the scope of the sunlight assessment. Despite falling short of the recommendations for rooms within a southerly aspect, owing to the obstruction caused by the balcony, these windows allow additional sunlight into mainly north facing rooms.
- 6.6.14 Eight further LKDs would fall short of the APSH recommendation but receive good levels of sunlight in winter. These are located below pop out balconies which act as shading devices, intercepting high angle sunlight in summer and allowing low angle winter sunlight into the rooms. It is outlined that good levels of sunlight will be enjoyed within the balconies themselves in the summer.
- 6.6.15 Finally, LKD, would have very good levels of sunlight throughout the year but would fall slightly short of the winter target. The windows serving these rooms face nearly due west and as such their access to sunlight is inherently limited to the afternoon hours in summer and mid-season.
- 6.6.16 With regard to overshadowing of amenity spaces, the report finds that all areas of outdoor amenity well exceed BRE's recommendation for an outdoor space to be well sunlit throughout the year. The sun exposure assessments demonstrate that excellent levels of sunlight will be enjoyed in these areas both in the summer and mid-season.
- 6.6.17 The Council engaged the services of a specialist consultant to provide independent appraisal of the Internal Daylight, Sunlight and Overshadowing Report. The consultant verified that where the rooms do not meet the guidelines for daylight and sunlight, they are generally located behind or beneath recessed balconies which hinder the access of daylight. The consultant has advised that overall, the daylight and sunlight provision to the new units is considered very good for a development of this size. Where there are transgressions, these should be balanced with the inherent features of the proposed development such as private amenity in the form of balconies, which would be well sunlit themselves. Moreover, the consultant has confirmed that the overshadowing

analysis demonstrates that amenity area tested within the scheme would fully comply with the recommended guidelines.

Privacy

- 6.6.18 The flank elevations of the proposed buildings would feature primary habitable room windows serving bedrooms and secondary windows serving the communal living areas. The separation distance between the facing flank elevations of buildings A and B and B and C would be approximately 21m and 20m respectively while the distance afforded between the flank elevations of building C and D would be more limited to approximately 12 metres.
- 6.6.19 The relationship between Blocks F and G and G and H would differ due to the off set and angled orientation so as to reduce a direct facing window relationship. The distances between buildings F and G would be between approximately 16m to 23m and the distances between building G and H are between approximately 12m and 15m.
- 6.6.20 In respect of the town houses, the closest relationship with building D is approximately 10 metres and with building F approximately 9.5 metres.
- 6.6.21 Given the density of the subject proposal, which is consistent with the need to make effective use of this brownfield and accessible site, it is considered that the overlooking relationship would not be so severe as to create unacceptable privacy conditions for the future occupiers of the corner flats. Moreover, effort has been made to provide dual-aspect living rooms, which would therefore result in the flank wall windows serving as a secondary source of light and outlook, as opposed to the primary openings. This would serve to further reduce any perceived or actual overlooking relationship between habitable rooms. All of the ground floor units would be raised above street level which would ensure privacy for these residents whilst also providing an active street frontage. The relationship between the buildings is therefore considered to be commensurate with the intended character of the higher density proposal and the likely expectations of future occupiers of the development. Had the proposal been considered acceptable in other regards a condition could be included for the incorporation of privacy screens in relation to the end/corner balcony units.

Noise and Vibration

- 6.6.22 The application is supported by a Noise and Vibration Assessment produced by ACCON. A noise measurement survey was carried out across the site in order to determine the extent to which the proposed development site is currently affected by noise. The primary sources of noise identified were from train movements, activities at the station (e.g such as announcements and train door movements) and from road traffic. The report identifies that the site is generally a low to medium noise risk during the daytime and medium noise risk during the night time.

- 6.6.23 In order to alleviate external noise risk, noise mitigation measures have been incorporated into the private amenity spaces. These measures include:
- Recessing balconies overlooking the railway sidings and London Road
 - Introduction of sound absorptive material in the balcony soffits
 - Introduction of solid balustrades with a height of 1.1 metres to balconies
- 6.6.24 The noise report finds that there will still remain some exceedances of up to 9dB of the upper target noise level where balconies overlook London Road and up to 2dB where some balconies overlook the railway line. In order to address this element a number of design solutions are put forward including the use of a double glazed window system and the use of a mechanical ventilation system. The report also notes that residents will have access to a number of communal outdoor areas located around and between the proposed buildings. Most of these areas would be screened from road traffic and railway noise sources and therefore will experience a noise level within or below the target noise level range. As such, the report considers that the worst affected balconies can be off set by the provision of communal outdoor spaces and readily accessible public spaces.
- 6.6.25 In relation to vibration measurements, the Assessment notes that the proposed development would incorporate building foundations which will resist motion from ground-borne vibration. Following the vibration assessments undertaken, the submitted report considers that no vibration mitigations measures would be required for the proposed development.
- 6.6.26 The application was referred to the Council's Environmental Health officer who has acknowledged the recommendations within the Assessment for a sound reduction of 9dB(A) to achieve the target internal noise levels with windows closed. Subject to conditions requiring a detailed sound insulation scheme to provide noise mitigation measures, the proposal would be acceptable in this regard. Additional conditions would also be required in relation to the commercial element to restrict delivery times and noise from any plant.

Private and Communal Amenity Space

- 6.6.27** For private amenity space, the Mayor's Housing SPG requires a minimum of 5m² per 1-2 person dwelling and an extra 1m² for each additional occupant. This is also reflected in Policy D6 of the London Plan (2021). All of the proposed flats would be served by a balcony and would meet or exceed the minimum private amenity space requirements. The proposed town houses would provide amenity space in the form of back gardens and roof terraces which would also provide a sufficient level of space for future occupiers. The Pedestrian Level Wind Microclimate Assessment produced by RWDI details that the majority of balcony locations would be suitable for the intended use during the summer season. However, the report considers that several balcony levels would be up two categories windier than suitable for the intended use. The report notes that instances of strong winds with the potential to be a safety concern or occupants would be likely to occur on balconies with conditions suitable for strolling or walking use during the summer season. No instances of strong winds would be

anticipated to occur at ground level throughout the year. Strong winds would be likely to occur at roof levels, but as these are for maintenance only roof level mitigation would not be required. In order to mitigate wind impacts, it is proposed that balcony screens would be introduced. The report also notes that the wind mitigation measures should be subject to quantitative tests by a qualified wind engineer. Therefore, having regard to the conclusions of the report, officers consider that this aspect of the development could be mitigated through detailed conditions.

- 6.6.28 In addition to the private balconies, occupiers of the flats would also have access to four communal outdoor spaces. Three communal gardens would be located along the street and a further wildlife garden would be created in the southern part of the site between the proposed woodland villas. These communal areas would supplement the private balconies and would provide a welcome additional component to the amenity afforded to future occupiers of the development.
- 6.6.29 The proposed communal gardens would be overlooked by the buildings that they serve (by virtue of the windows within the flank elevations) and would be at surface level, thereby being accessible to the future users. The Mayors Housing SPG also states that communal areas should be designed to take advantage of direct sunlight. In this regard the overshadowing effects of the development upon the proposed communal amenity spaces has been examined in the submitted Overshadowing Report produced by GIA. BRE guidance recommends the amenity space to receive more than two hours sunlight on 21st March (i.e the Spring Equinox). The submitted assessment finds that all public outdoor amenity spaces would exceed BRE recommendations. Furthermore, the Pedestrian Level Wind Microclimate Assessment produced by RWDI details that the proposed wind conditions at ground level of the proposed development would be suitable for the intended use during the windiest season with conditions surrounding the site similar to those at the existing site. Taking this into account, it is considered that the quantity and quality of communal space provided would be acceptable.

Children's Play space

- 6.6.30 The relevant policies require an on-site provision of facilities where a development would result in a net increase in child yield. Applying the GLA Population Yield Calculator, the proposed development is expected to yield a total of 135 under 16's comprising 64 x 0-4-year olds, 49 x 5-11 year olds, 22 x 12-15 year olds and 12 16 -17 year olds. The Council's Planning Obligations SPD, informed by Harrow's PPG 17 Study, sets a quantitative standard of 4 square metres play space per child. Based on the indicative child yield from the development, this would equate to a minimum requirement of 588m² of play space. In terms of the GLA minimum benchmark requirement, this would result in a total play space requirement of 1471m².
- 6.6.31 The submitted Landscape and Public Realm Strategy by Townshend Landscape Architects provides details of the proposed play strategy. The report identifies that the proposed development would provide 1,516m² of play provision that would be located within the communal shared amenity spaces along the street. This would exceed both the LPAs and GLA benchmark based on the projected

child yield for the development. There would also be a play trail incorporated along to social street which has not been included in the play space area calculations. The submitted Landscape and Public Realm Strategy also notes that the communal amenity spaces are intended to be multifunctional, serving as places to encourage social interaction (through seating) and visual amenity through generous planting. The gardens would be easily accessible from the street and would be gated so that they could be secured at night.

- 6.6.32 Although no specific provision has been made for older children, it is considered that in the event that planning permission is granted, a section 106 contribution could be secured towards off-site provision, including the creation of new facilities or improvements to existing provision to meet the needs of older children.

Accessibility

- 6.6.33 To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, the London Plan required at least 10% of dwellings to meet Building Regulation requirement M4(3) 'Wheelchair user dwellings'. All other dwellings (i.e the remaining 90%) would need to meet Building Regulations requirement M4(2) 'accessible and adaptable dwellings'.
- 6.6.34 The submitted applications documents confirm that 10% of the proposed units would be in accordance with M4(3) 'Wheelchair user dwellings' and the remaining units would comply with M4(2) 'accessible and adaptable dwellings'. The wheelchair user dwellings would be spread throughout the proposed buildings and tenures and is considered to be an appropriate response. Had the proposal been considered acceptable in other regards a condition would have been recommended requiring the internal layout of the buildings and its external spaces to meet these standards. Subject to this condition, officers consider that the proposed development would acceptable in this regard.
- 6.6.35 Building entrances would be clearly signified through recesses, entrance doors with glazed side panels/fanlight and external lighting. Proposed external hard and soft landscaping would run flush at a gradient no steeper than 1:21 from the street to the wide front doors with level thresholds. All units will have accessible bathrooms and living area at entrance level, generous hallways and wide doors and access doors onto terraces and balconies will also benefit from level thresholds.
- 6.6.36 Officers consider the proposal to be well considered in relation to accessibility and would comply with the relevant policies outlined above.

Refuse and Waste

- 6.6.37 Each building would have a dedicated refuse and recycling store at ground level. The stores would be accessed from the new street and would be within a 10m drag distance. For every 8 flats 1 x 1100 litre bin would be provided and 1x 1280 litre bin would be provided which accords with the Council's refuse code. It is noted that the townhouses do not all include provision for garden waste which

would require an additional bin. However, it is considered there is scope to accommodate this within the defensible space and further details of this could be secured by condition. The Council's waste team have raised no objection to the proposals. Overall, the arrangements are considered to be acceptable.

Residential Amenities of adjoining occupiers

6.6.38 The application site is located within in a suburban area and as expected, many of the adjacent land uses are residential. The building heights are generally uniform, varying between two and three storeys. The nearest residential properties are as follows

- Properties located to the east of the site along Westbere Drive (primarily No's 8 -44) which are located between approximately 7 and 23 metres from the application site boundary
- Properties to the north east fronting London Road (primarily No's 73 to 85) which are located at a distance of 5 to 90 metres from the eastern site boundary.
- The closest properties to the west along Merrion Avenue would be separated by the train tracks at a distance ranging between approximately 70 to 100m from the application site western boundary (No's 47 to 125 plus the Landsby development).
- The closest properties to the south are located in Dalkeith Grove which are approximately 90 metres from the southern application site boundary.

Visual Impact, Outlook and Privacy

6.6.39 Undoubtedly, the proposed development would represent a distinctive new addition to the area. It would, by reason of its height, be visible to occupiers of premises over a wide area. However, the impacts would be most pronounced for the occupiers of adjoining sites, in particular the residential properties to the east along Westbere Drive and the closest properties sited towards the north east along London Road. The existing surface car park provides an unobstructed view in the outlook of the residential units and dwellinghouses that surround the application site. In this context, the introduction of development on the site (especially at the scale proposed) would result in a significant change in the outlook and associated amenity benefits currently experienced by the neighbouring residential occupiers. However, being able to see a building is not of itself indicative of visual harm, and it is therefore necessary to consider in greater detail the specific relationships that would result between the proposed buildings and structures and the nearest affected neighbouring properties.

6.6.40 The development seeks to mitigate against the closest properties in Westbere Drive (Westbere Court to No. 42) through provision of three storey town houses in this part of the site which provides an appropriate transition in scale and an acceptable amenity impact. However, as discussed in section 6.4 of the appraisal (paragraphs 6.4.24 to 6.4.26), the relationship would be most acute for the two storey dwellings in Westbere Drive (No's 8 to 30). Having regard to the proposed distances between buildings, the short gardens of the Westbere Drive properties and the overall scale of the blocks, the magnitude of the visual impact

is considered to be excessive, overly dominant and oppressive for these neighbouring occupiers. This would be exacerbated by the hard edge conditions created by the podium car park. In terms of privacy and overlooking impacts, it is noted that the Mayor's SPG refers to separation distances of 18-21 metres between facing elevations with habitable rooms as being 'useful yardsticks' for visual privacy. The separation distances (26 to 38m) of those residential properties directly facing blocks C and D in Westbere Drive would therefore be sufficient to mitigate against any unreasonable privacy impacts between the residential buildings.

- 6.6.41 Building A would be separated from Building B by a 21-metre buffer. The corner of each building would be separated from the corner of No 85 London Road, a three-storey building which contains several flats by 18 metres. The buffer between buildings A and B would serve as a visual break for the flats which have windows and balconies located on the eastern flank wall of this building. Building B would be located to the rear of the flats. As a result of the orientation and the positioning of buildings A and B, there would be no direct overlooking or unreasonable loss of privacy. The residential properties further to the east along London Road have their main outlook facing south and north and as such would not directly face towards the application site. Residential properties No. 8 and 10 Merrion Avenue would be positioned in between the gap of buildings B and C which would again provide some visual relief for these properties, resulting in views at oblique angles. The gap between buildings in this case would be approximately 37 metres. Whilst recognising that the adjacent occupiers would experience a visual change of large magnitude, taken together with the separation distances described above, the orientation of buildings, the visual relief provided by gaps between the buildings and having regard to the need to make effective use of this allocated site, officers consider that the resulting visual and privacy impacts would be not be unacceptable in respect of this group of properties.
- 6.6.42 In terms of buildings F, G and H, the amenity impact as a result of the scale of the buildings would be somewhat reduced by their siting in the lowest part of the site. While the upper storeys of the proposed buildings would be visible from the rear elevations of the closest properties to the east, west and south, they the intervening railway embankment and railway tracks to the west and siting of trees within the SINC to the south and east, would serve to provide an effective degree of screening. Block F would be approximately 100 metres from the facades of the Merrion Avenue properties and 40 metres from the closest facades of the Westbere Drive properties. Block G would be approximately 100 metres from the facades of the closest Merrion Avenue properties and 70 metres from the closest facades of the Westbere Drive properties. Block H would be approximately 160 metres from the facades of the closest Dalkeith Grove properties and 100 metres from the facades of the closest Merrion Avenue properties. Given the separation distances afforded, it is considered that the proposed buildings F, G and H would not have a detrimental impact on the visual or privacy amenities of the adjacent occupiers along Merrion Avenue, Dalkeith Grove or Westbere Drive.
- 6.6.43 The proposed development would, of course, also be visible to residential occupiers and from commercial premises within the wider locality. Given the

conclusions about visual impact in relation to residential properties much closer to the application site than those within the wider area, it follows that the visual impact upon occupiers of all other affected properties can be accepted.

Daylight and Sunlight Impacts

- 6.6.44 A Daylight and Sunlight report produced by GIA has been submitted with the application. The assessment uses widely-recognised methodology to assess the proposal's impact upon neighbouring property against British Research Establishment (BRE) guidelines. The report considers the three BRE Guidelines methodologies for daylight assessment of neighbouring properties; the Vertical Sky Component (VSC); the No Sky Line (NSL); and the Average Daylight Factor (ADF). It is necessary for both the VSC and NSL to be met for any particular room in order to satisfy the BRE guidelines. For the sunlight assessment, the report uses the Annual Probable Sunlight Hours (APSH) methodology. In accordance with BRE guidelines, only the main rooms (living rooms, dining rooms and kitchens) in neighbouring properties have been considered. Staircases, hallways, bathrooms and toilets have not been considered. The report also provides precedent examples of recent permissions that have been granted by the Council, and the respective daylight and sunlight impacts/relationships of those schemes.
- 6.6.45 The Council engaged the services of a specialist consultant to provide independent appraisal of the applicant's daylight and sunlight assessment. The consultant has endorsed the methodologies employed and adopted a significance criteria to summarise the impacts of the development on the neighbouring residential properties. This applies to VSC where VSC is reduced to less than 27%, to NSL, and to APSH where the APSH is reduced to less than 25% and/or less than 5% in the winter months.
- Reduction of 0% of 20%: negligible impact
 - Reduction of 20% to 30%: minor adverse impact
 - Reduction of 30% to 40%: moderate adverse impact
 - Reduction of more than 40%: major adverse impact
- 6.6.46 This criterion is considered by reference to the overall impact on an individual dwelling or block of dwellings rather than necessarily related to one window alone. The independent consultant has provided specific comments where necessary in relation to the assessment findings.
- 6.6.47 The independent consultant has verified that the following properties would comply with the recommended guidelines and would experience a negligible impact in terms of daylight:
- 24 Kerry Court
 - 81, 83 & 94 London Road
 - 9-21 (odds) Westbere Drive
 - 32-50 (evens) Westbere Drive
 - The Landsby Development

- 61, 91 & 93 Merrion Avenue

6.6.48 The 14 remaining properties considered within the assessment are discussed in further detail below.

85-87 London Road

6.6.49 The Submitted Daylight and Sunlight Assessment outlines that as the proposed site is currently undeveloped any meaningful massing over the site that provides a similar level of housing amenity will likely cause alterations in daylight and sunlight outside of BRE Guidelines. Of the 38 windows assessed in relation to VSC, 17 (45%) will meet the values outlined in the BRE guidelines. The remaining 21 windows will experience BRE transgressions. In terms of daylight distribution, of the 19 rooms facing the site, 15 (79%) will meet the BRE guidelines for NSL. It is noted that each of the four rooms that experience BRE breaches in NSL are bedrooms which have a lower requirement for daylight distribution. In terms of sunlight, of 28 windows, 14 (50%) will experience BRE compliance in relation to sunlight.

6.6.50 The Council's Independent Consultant has reviewed the report and considers for VSC, 4 of the 19 rooms assessed would meet the recommended guidelines. Of the 15 rooms that fall below, 2 would experience a minor adverse impact, 1 a moderate adverse impact and 12 a major adverse impact. For NSL, 15 rooms would meet the recommended guidelines. The 4 bedrooms that fall below would each experience a minor adverse impact and retain direct sky to between 68.6% and 74.3% of their area. As bedrooms have a lower expectation for daylight this could be considered reasonable. GIA have also discussed the results on a flat by flat basis, the conclusions of which are considered to be appropriately stated. Overall, the impact to this property is considered to be major adverse.

6.6.51 In terms of sunlight the independent consultant finds that of the 19 rooms assessed, 9 would comply with the recommended guidelines. The 10 rooms that fall below would experience a major adverse impact. GIA have also discussed the results on a flat by flat basis, the conclusions of which are considered to be appropriately stated. Overall, the impact to this property in terms of sunlight is considered to be major adverse.

6.6.52 Further comments were sought from the independent consultant in relation to the results for this property. The consultant has confirmed that the majority of affected rooms would be bedrooms which have a lower requirement for daylight and although a room does need to comply with both VSC and NSL assessments to completely satisfy BRE guidelines, the results must also be considered flexibly. In this case, the NSL results are generally good. The VSC figures are somewhat worsened by the buildings own design – balconies, overhangs, side returns and small circular windows. The living spaces are located on the corners of the building and so the dual aspect nature does mitigate some of the impact as these rooms are also served by a number of windows not affected by the development. The average retained values to the living rooms as a whole are considered reasonable.

6.6.53 Overall, officer acknowledge that the design of the building should not prejudice the development of an allocated site and the retained VSC values to living rooms and high NSL compliance are not considered to be unreasonable overall. As such, officer consider the daylight and sunlight impacts on this property to be acceptable.

8-10 Westbere Drive

6.6.54 8-10 Westbere Drive are two storey residential properties located immediately to the east of the site. As the proposed site is currently vacant, both these properties experience a high amenity value of daylight in the existing scenario. As such, the report outlines that any meaningful provision of housing on the site will cause changes in daylight that are beyond the BRE guidelines.

6.6.55 In relation to 8 Westbere Drive, there will be two windows that serve a LKD (living, kitchen, dining area) which will experience a VSC change of 31% and 30.9%. The report considers that weight should be given to the retained daylight values and not just the percentage change, given the existing daylight levels and site context. Two windows will retain VSC values of 24.3% and 24.6% which is just below the target figure of 27%. It is noted the room will experience full compliance for daylight distribution (NSL) and will retain a view to the sky for over 89% of its working plane. The first floor window affected will retain a VSC value of 21.9% and will experience compliance with NSL.

6.6.56 In terms of sunlight, all windows will adhere to BRE guidelines for both properties.

6.6.57 In relation to 10 Westbere Drive, the affected LKD room windows will retain VSC values of 24.4% which is just below the target figure of 27% and will also achieve BRE compliance for daylight distribution. The affected first floor bedroom windows will retain a VSC value of 21.7% - 21.8% and will experience NSL compliance.

6.6.58 In relation to these properties the Council's independent consultant has outlined that for VSC, all 3 of the rooms assessed in each property would fall below the recommended guidelines and experience a moderate adverse impact. The windows all experience high VSC values above 31.8% in the existing scenario due to the current empty site conditions, so although there will be reductions in VSC the retained values could still be considered reasonable at 21.7% - 24.6%. All rooms would comply with the recommended guidelines for NSL. Overall, the impact to these properties is considered to be minor adverse.

12-14 Westbere Drive

6.6.59 In relation to 12 Westbere Drive, two ground floor LKD rooms windows will experience a VSC change of 32.7% and 33.3% but will have retained values of 23.6% and 24.1%. The affected windows would be compliant in relation to NSL. The affected first floor bedroom window would retain a VSC value of 21.7% and would also comply with the guidelines for NSL. All relevant windows would adhere to BRE guidelines in terms of sunlight.

- 6.6.60 In relation to 14 Westbere Drive, the affected ground floor LKD room windows would retain values of 21.5% and 23.7% and would comply with the BRE guidelines for NSL. The affected first floor bedroom window would retain a VSC value of 21.6% and would experience compliance for NSL. In respect of sunlight three room will meet BRE guidelines. In respect of the remaining window, this will retain an annual sunlight figure of 33% which is greater than the 25% figure suggested in the BRE guidelines. In winter a value of 4% would be retained which is just below the 5% target value.
- 6.6.61 In relation to these properties the Council's independent consultant has outlined for VSC, all 3 of the rooms assessed in each property would fall below the recommended guidelines and experience a moderate adverse impact. The windows all experience high VSC values above 30.2% in the existing scenario due to the current empty site conditions, so although there will be reductions in VSC the retained values could still be considered reasonable at 21.5% - 23.7%. For NSL, 2 of the 3 rooms assessed in each property would meet the recommended guidelines. The 1 bedroom that falls below in each instance would experience a minor adverse impact and retain direct sky to 76.4% and 74.4% respectively which could still be considered reasonable. Overall, the impact to these properties is considered to be minor adverse.

16 Westbere Drive

- 6.6.62 The submitted daylight and sunlight assessment reports that the LKD dining room on the ground floor of this property is served by five windows. Two windows will experience VSC changes of 42.6% and 46.5% but it should be noted that the three additional windows will be BRE compliant. Therefore, when the room is considered as a whole it will retain a VSC figure of 26.1% which is just below the 27% recommended figure. It is also noted that the room is served by three skylights and as such the room will retain a good level of daylight amenity. It is reported that following completion of the scheme, over 96% of the working plane in the room will retain a direct view of the sky dome. One of the affected first floor bedroom window would retain a VSC value of 21.8% and an NSL value of 74.2%. The report notes that bedrooms have a lower requirement for daylight distribution. The other affected bedrooms would retain a VSC value of 21.9% and would experience compliance with NSL. All rooms within the property would comply with the BRE guidelines for sunlight.
- 6.6.63 The Council's independent consultant has outlined that for VSC, 1 of the 3 rooms assessed would meet the recommended guidelines. The 2 bedrooms that fall below would experience a moderate adverse impact and retained values of 21.8% and 21.9%. These values could be considered reasonable, in particular because bedrooms naturally have a lower expectation of daylight. For NSL, 2 of the 3 rooms assessed would meet the recommended guidelines. The 1 bedroom that falls below in would experience a minor adverse impact and retain direct sky to 74.2% which could still be considered reasonable. Overall, the impact to this property is considered to be minor adverse.

18, 20 & 22 Westbere Drive

- 6.6.64 The submitted report finds that for 18 Westbere Drive, the affected ground floor LKD will retain VSC values of 21.5% to 22.7% and will experience compliance for NSL. The affected first floor bedroom window will retain a VSC value of 22.3 % and will experience compliance for NSL. The report finds that this room would be compliance in term of BRE sunlight guidance.
- 6.6.65 In respect of 20 Westbere Drive, the affected ground floor LKD room windows will retain VSC values of 24.1% and 24.8% and the affected first floor bedroom would retain a VSC value of 20.5%. and 20.4%. All rooms would experience compliance with NSL daylight distribution guidelines. The report finds that all room would achieve compliance in term of BRE sunlight guidance.
- 6.6.66 In respect of 22 Westbere Drive, the affected ground floor windows would retain VSC values of between 21.8% and 24.7% and would all experience compliance for NSL. The affected first floor window will experience an alteration of 34% and will retains a VSC value of 20%. This room would meet the BRE guidelines for NSL. In respect of sunlight the report finds that 3 out of 4 windows would comply with the BRE guidelines. In relation to the remaining window, this would experience a retained APSH of 9% and a winter APSH of 3% which is 2% below the target value for winter.
- 6.6.67 The Council's independent consultant has outlined that for VSC, all of the rooms assessed in each property (3 rooms in no's 18 & 20, 5 rooms in no 22) would fall below the recommended guidelines and experience a moderate adverse impact. The windows all experience high VSC values above 30.3% in the existing scenario due to the current empty site conditions, so although there will be reductions in VSC the retained values could still be considered reasonable at 20% - 24.8%. All rooms would comply with the recommended guidelines for NSL. Overall, the impact to these properties is considered to be minor adverse.
- 6.6.68 In respect of No. 22 Westbere Drive, the Council's independent consultant has advised that of the 5 rooms assessed, 4 would comply with the recommended guidelines. The kitchen that falls below would exceed the annual sunlight target of 25%, but experience a major adverse impact in winter sunlight, retaining a figure of 3%. The reduction in former value is somewhat magnified due to the low existing figure which is due to the obstruction of the buildings own rear extension, the room in which would fully comply with the guidelines. Overall, the impact to this property is considered to be negligible.

24, 26 & 28 Westbere Drive

- 6.6.69 In relation to 24 Westbere Drive, the affected LKD windows on the ground floor would retain VSC values of 23-23.5% and would comply with the NSL guidelines. The affected first floor bedroom windows would retain VSC values of 19.5% and 19.1%. One of the affected bedroom windows would not comply with the NSL guidelines, retaining a value of 69.7%. However, the report notes that bedrooms have a lower expectation of daylight distribution. Three out of four windows will meet BRE requirement for sunlight. In relation to the remaining window this will experience an annual APSH of 24% which is just short of the 25% under the BRE

guidelines. It is noted that in terms of winter sunlight, this window would retain a value of 7% which is greater than the 5% recommended by the BRE.

- 6.6.70 In relation to No. 26 Westbere Drive, the report finds that the affected LKD windows on the ground floor would retain VSC values of 22.1% to 22.7%. One of the first floor bedroom windows would retain a VSC value of 18.5% and the other 18.4% and they would also experience a technical transgression of 20.6% and 37.8% in terms of NSL. However, in relation to these rooms the report outlines that one room will retain a view to the sky from 75.8% of its working place and the other room will retain at least 50%. It is further pointed out that bedrooms have a lower expectation of daylight distribution. Three out of four windows will meet BRE requirement for sunlight. In relation to the remaining window this will experience an annual APSH of 23% which is just short of the 25% under the BRE guidelines. It is noted that in terms of winter sunlight, this window would retain a value of 7% which is greater than the 5% recommended by the BRE.
- 6.6.71 In respect of No, 28 Westbere Drive, the affected ground floor LKD room windows will retains VSC values of 20.6% and 22.2%. In terms of affected first floor bedroom windows will retains VSC values of 18.3%. Moreover, one of the rooms would result in a transgression in relation to NSL, retaining a value of 61.2%. The first floor bedroom windows would also experience transgressions in relation to sunlight. The annual APSH retained figures would be 22-23% which is just short of the 25% recommended by the BRE. In relation to winter sunlight, figures of 7 and 8% would be retained which exceeds the 5% recommended by the BRE.
- 6.6.72 The Council's independent consultant considers that for VSC, all 3 of the rooms assessed in each property would fall below the recommended guidelines and experience a moderate adverse impact. The windows all experience high VSC values above 30.3% in the existing scenario due to the current empty site conditions. The retained VSC values for the ground floor LKD's could be considered reasonable at 20.6% - 23.5%. The first floor bedrooms retain slightly lower value between 18.3% - 19.5%, however they do have a naturally lower expectation of daylight. For NSL, 2 of the 3 rooms assessed in no's 24 and 28, and 1 room in no 26 would meet the recommended guidelines. The rooms that fall below in each instance are bedrooms and would experience minor to moderate adverse impacts. The rooms would retain direct sky to between 60.5% - 75.8% of their area which could be considered reasonable for bedrooms where daylight is seen as less important. Overall, the impact to these properties is considered to be moderate adverse.
- 6.6.73 In relation to sunlight, the Council's independent consultant reports that 3 rooms have been assessed within each property. 2 of the 3 rooms at no's 24 and 28, and 1 room in no 26 would meet the recommended guidelines. The rooms that fall below are bedrooms and would exceed the winter sunlight target of 5% but experience major adverse impacts in annual sunlight. These rooms benefit from high existing values of 41% APSH due to the current empty site conditions. Despite the reduction in former value the retained values for these rooms are still good between 22% and 24%, particularly for bedrooms which have a lower

expectation for sunlight. Overall, the impact to these properties is considered to be negligible.

30 Westbere Drive

- 6.6.74 In relation to 30 Westbere Drive, the report finds that the affected ground floor window would retain values of 23.4% and 23.8% and will also comply with the NSL guidelines. One of the first floor affected bedroom windows would retain a VSC value of 21.2% and an NSL value of 70.2%. The other affected first floor bedroom window would retain a VSC value of 21.8% and would experience compliance for NSL. All windows would comply with the BRE guidelines for AP SH.
- 6.6.75 For this property, the Council's independent consultant considers that for VSC, all 3 of the rooms assessed would fall below the recommended guidelines and experience a moderate adverse impact. The windows all experience high VSC values above 32.7% in the existing scenario due to the current empty site conditions. The combined retained VSC value for the ground floor LKD could be considered reasonable at 23.6%, as could the values of 21.2% and 21.8% for the first floor bedrooms. For NSL, 2 of the 3 rooms assessed would meet the recommended guidelines. The 1 bedroom that falls below would experience a minor adverse impact and retain direct sky to 70.2% which could still be considered reasonable as bedrooms have a lower expectation for daylight. Overall, the impact to this property is considered to be minor adverse.

Westbere Court

- 6.6.76 The submitted daylight/sunlight assessment considers that there are 14 rooms relevant for assessment in Westbere Court. It finds that 10 of the 14 rooms (71%) would achieve BRE compliance and that the remaining four rooms would experience minor transgressions in relation to the BRE compliance. The affected habitable ground floor windows would retain VSC values of 12.7%, 14.2% and 23.5% and will meet the guidelines in terms of NSL compliance. The affected first floor window would retain a VSC value of 7.3% but it is noted that the existing value is already low at 11.5% and as such any realistic massing on the site will cause reductions in VSC. In terms of the affected room, it would meet the BRE guidelines for daylight distribution.
- 6.6.77 With regard to sunlight 9 out of 10 rooms relevant for assessment would comply with the BRE requirements for AP SH. The one room that does not comply would retain a value of 22% for annual AP SH which is just below the target 25%. In terms of winter sunlight, the retained figure would be 7% which exceeds the recommended target of 5%.
- 6.6.78 The Council's independent consultant considers that for VSC, 10 of the 14 rooms assessed would meet the recommended guidelines. Of the 4 rooms that fall below, 3 would experience a minor adverse impact and 1 a moderate adverse impact. It is stated that the windows are assumed to serve habitable rooms however the windows are fairly small so it could be possible that some do serve non habitable spaces. All rooms would comply with the recommended guidelines for NSL. Overall, the impact to this property is considered to be minor adverse.

- 6.6.79 In terms of sunlight the consultant considers that of the 10 rooms assessed, 9 would comply with the recommended guidelines for both annual and winter sunlight. The 1 room that falls below would exceed the winter sunlight target of 5%, but experience a moderate adverse impact in annual sunlight, retaining 22% APSH which is not too far from the target of 25%. Overall, the impact to this property is considered to be minor adverse.

Residential Flats within Stanmore Station

- 6.6.80 The floor plans for the residential flats within the station have been provided by TFL. The floor plans outline that only the basement level on the façade facing the proposal contains habitable rooms including a kitchen and a bedroom. The applicants report finds that the kitchen will comply with the BRE guidelines for both daylight and sunlight. In relation to the bedroom, this would retain a VSC value of 23.9% and comply with the NSL guidelines. In terms of sunlight the bedroom does not contain any rooms within 90 of due south and therefore does not require assessment.

Overshadowing Impact

- 6.6.81 An overshadowing assessment was undertaken to determine whether the amenity areas surrounding the Site at the following properties achieve adequate levels of sunlight (two or more hours) on the 21st March. Based on the technical analysis, it was found that all amenity areas would achieve BRE compliance in relation to the sun hours on ground assessment. The Council's Independent Consultant confirms that the impact in overshadowing is therefore negligible.
- 6.6.82 GIA have also undertaken additional Daylight and Sunlight analysis modelling on a theoretical reduction in height of one storey across buildings C and D which have the most direct and closest relationship with neighbouring properties. GIA have concluded that this change would make an almost entirely imperceptible difference to the properties; and where there are improvements to the lighting condition of windows and bedrooms, the vast majority are already compliant with the BRE Guidelines when the massing as proposed is considered.

Overall impact

- 6.6.83 It is clear from the submitted assessment and the review undertaken by the Council's Independent Consultant, that a number of adjoining properties would see transgressions in the level of daylight and sunlight beyond the BRE guidelines. Officers acknowledge that some rooms would be particularly impacted and would see material changes in the level of daylight and sunlight currently experienced. However, where the fairly small number of transgression do occur they are largely as a result of the exiting empty site conditions or design of the property and are not considered to be so significant as to be unreasonable, taking account of the sites allocation for housing which is next to a major transport node. Moreover, these impacts must be considered against other material considerations. In relation to the site context, it is recognised that the adjacent residential properties currently experience very high levels of daylight

and sunlight as a result of the absence of built massing within the application site. This accounts for greater reductions in former values as a result of the development, but as affirmed by the Council's Independent Consultant, most of the retained values to rooms are still very good. While some of the rooms facing the application site may experience notable changes to daylight and sunlight currently experienced, some consideration is also given to the dual-aspect layout of the adjacent residential units.

6.6.84 The National Planning Policy (2019) and the relevant policies of the development plan set out the need to make effective use of land in meeting the need for homes. This is particularly significant given the allocation of the application site, the focus on surface car parks and sustainable locations in the optimisation of housing delivery. Taking the conclusions of the specialist consultant, the extent and degree of daylight and sunlight losses that would occur, the need to balance the efficient use of this allocated site, and the other considerations detailed within the report, it is concluded that the proposal would maintain an high standard of amenity for neighbouring residential occupiers. The limited losses to sunlight and daylight are not deemed to be so significant as to warrant a refusal of the application and in officer opinion are outweighed by the other material considerations.

Proposed use

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

6.7 Transport and Parking

6.7.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2021): T1, T2, T3, T4, T5, T6, T6.1, T7
- Harrow Core Strategy (2012): CS1R
- Harrow Development Management Policies (2013): DM42, DM43, DM44, DM45

6.7.2 The development site is located adjacent to Stanmore Station along London Road which is characterised by residential neighbourhoods on either side. There are double yellow line restrictions in operations along the majority of the route. Stanmore station is on the end of the Jubilee Line which provides access

eastbound to central London, with around 18 southbound trains in the AM and PM peak.

- 6.7.3 The site is currently occupied by a public car park which provides 446 car parking spaces. The proposed development will provide 300 car parking spaces, including the retention of the existing 12 accessible public spaces and electric vehicle parking. The site is situated within CPZ “HB” with hours of restriction in operation at anytime.
- 6.7.4 The sites accessibility is classified as PTAL 4 ‘good’ with the proposed development situated within the immediate proximity of Stanmore Station and several bus routes.
- 6.7.5 The development proposals include a TFL Cycle Hub in building A for station users located at the north end of the site. The TFL cycle hub would accommodate 128 cycle spaces in the form of two tiered cycle racks and some Sheffield stands.
- 6.7.6 The proposed residential development will be car free with the exception of accessible parking bays. The residential accessible parking bays would be provided externally, separate from the basement level public car park.
- 6.7.7 The proposed basement level car park will provide 300 spaces for public use, which will include 12 public accessible bays. Access to the Station public car park will be via a ramp.
- 6.7.8 The proposal includes a site access road which will extend between London Road to the north and proposed building H at the south end of the site. The site access will be lightly trafficked at the southern end, only providing vehicle access for residents with accessible parking bays on site and for delivery and service vehicles. The access road carriageway varies in width along the length to reflect the varying use of the road and to maximise opportunities for landscaping, in order to provide a pleasant environment for residents. The north section of the access road is 5.5 metres in width between the junction with London Road and the access to the basement car park. This will be the most trafficked section of the road. The access road carriageway varies in width between the basement public car park and the south end of the site, between 4.1m and 4.8m. This section of the site access road would be lightly trafficked.
- 6.7.9 The proposals include the provision of a single car club bay on site which would be provided in the basemen car park.
- 6.7.10 The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also contribute to wider sustainability and health objectives. It emphasises the importance of reducing the need to travel and encouraging public transport provision to secure new sustainable patterns of transport use. The London Plan and local plan policies recognise the need for impacts on the transport capacity and network to be fully assessed, but also seek to encourage and facilitate a modal shift to more sustainable methods of transport such as walking, cycling and public transport.

6.7.11 The NPPF requires proposals that would generate significant amounts of movement to be supported by a Transport Assessment and to provide a Travel Plan. A Transport Assessment (TA) and Framework Travel Plan produced by WSP, have been submitted in support of the planning application. Further Transport Addendum notes were provided during the course of the planning application in response to comments from the Local Highways Authority. The comments of the Highways Authority are discussed below.

Station Car Park

6.7.12 Stanmore Station is positioned on the strategic road network, which makes it easily accessible for people travelling by car from areas north of London and also being the terminus for the Jubilee line it is one of the first underground stations many commuters will encounter as they make their way further into London.

6.7.13 The proposal seeks to reduce the capacity of the existing car park from 450 spaces to 300. This would also mean a daily am and pm peak hour reduction of 123 two-way car trips. The car park is very well used, the submitted details show full occupancy on weekdays for the majority of the traditional working day.

6.7.14 The Transport Assessment includes a study of where people are travelling from which shows that 17% of drivers using the car park live within 2km of the station. Whilst this could be considered as close enough to allow for walking and cycling, it should also be noted that to the north, Stanmore is very hilly; there is an elevational gain of at least 64m from the station. These conditions mean that although relatively easy going when heading to the station, the return uphill journey could be too challenging for some people. The northern parts of the area become fairly rural in characteristics with some roads having little or no footway although there are relatively few of these. Additionally, from as close as 200m from the station, the public transport accessibility level (PTAL) drops from 4 to 2 and reduces to 0 within the 2km distance cited. The majority of the Stanmore area is rated between 0 and 2.

6.7.15 The surveys undertaken with commuters at the station suggest that many would be open to travelling by sustainable means, however, it would be necessary to provide facilities to enable the modal shift to occur. There is a real risk that without mitigation, people will continue to drive to the station and will park on-street in the surrounding roads if they cannot use the car park. As the existing CPZ operates from 3-4pm, with more flexible working becoming the norm, it will be easier for some commuters to work around these restrictions unless the hours of operation are increased.

6.7.16 The presented case studies of commuter parking reductions all include mitigation measures intended to achieve modal shift such as CPZ alterations, improved walking and cycling facilities, improved access to green space and a scheme for dedicated commuter parking for certain residents. Officer consider that a cycle hub alone is not going to persuade people to choose cycling as an alternative to the car.

- 6.7.17 The borough has targets to increase sustainable travel therefore, this proposal could contribute to achieving these goals however, it is essential to ensure that there are sufficient good quality measures in place to enable walking and cycling to become primary modes of travel. The proposal to reduce car parking capacity cannot be supported at present unless further mitigation measures are introduced to encourage people to choose alternative modes of transport. The proposed step free access resolves the outstanding accessibility issue but this does not necessarily lead to the increase in non-car travel that is desired. The cycle hub is also welcomed and it is hoped that a secure, sheltered and managed facility would encourage some people to try cycling but in officers opinion other measures are going to be needed too, for example an electric bike hire scheme, cycle training or assistance with route planning. The reduction in spaces will not automatically change how people travel; it seems to have been assumed that this will cause people to switch to public transport, walking or cycling but there doesn't seem to be any incentive to induce the change in behaviour. The rising elevation of Stanmore is a barrier; cycling is not a preferred mode of travel across Harrow and there are many local areas that have very poor access to public transport.
- 6.7.18 The assessment also considers the effects of Wembley event days. It is understood that the car park operator promotes the use of the car park for onward travel. The suggestion to restrict this is outside of the Council's control and may present difficulties for TfL as owner as this is a commercial operation. Restrictions on advertising would not stop people from using Stanmore station for parking for Wembley events but it may help to reduce the number of new journeys carried out in this way. The issue of event day parking would still need to be addressed in any case as the reduction in capacity is still likely to result in overspill on-street parking that is not mitigated by the current operational hours of the existing CPZ.

Residential Development

Accessibility

- 6.7.19 The proposal includes a redesign of the existing junction with London Road and a new access road leading to the seven residential blocks.
- 6.7.20 The revisions to the layout of the junction are supported as the current level of conflict of manoeuvres with the existing arrangement is not ideal and does not make for a good pedestrian and cycling environment. Closing the direct access from the service road at its junction with London Road will remove the conflict and the opportunity for rat running to avoid queues along London Road at this point. The creation of a turning head allows larger vehicles to turn although this is likely to be limited to refuse collections and occasional deliveries to the residential properties.
- 6.7.21 The proposed access road serving the blocks of flats is intended to be lightly trafficked however will not be restricted by barrier so it will be possible for non-residents to access the site. There is a risk that this road will be used for drop-offs and pick-ups associated with the station therefore it is recommended that

regular patrolling or some other form of enforcement is carried out in this location. The potential frequency of this activity could be quite high, particularly when taking the reduction of car parking space into consideration however, this conflicts with the desire to create a predominantly car-free pedestrian environment. Measures should be taken to minimise the likelihood of non-residents using this road – appropriate signing and enforcement would be a good approach to begin with if a physical barrier is not considered appropriate. It is considered that further details on this point could be secured by condition in the event that planning permission is granted.

- 6.7.22 The proposed landscaping alterations outside the station at the junction are welcomed as this helps to create a generous, safe and attractive pedestrian area.
- 6.7.23 The findings of the road safety audit and proposed actions are accepted and are expected to be resolved at the detailed design stage. The RSA only looked at the proposed changes to the junction and the access road up to the entrance to the basement car park however, it is necessary to review the design proposal for the rest of the internal development road. Highways officers have raised a concern in relation to the proposed carriageway width reducing to 4.10m. Whilst it is appreciated that this is to accommodate landscaping, for safety reasons a minimum width of 4.80 metres is stipulated in the Harrow Street Design Guide; this is particularly important as the site is expected to generate a significant number of walking and cycling trips but unrestricted public access may result in a higher than desired number of cars entering this road and turning around to facilitate drop-offs as previously stated. Had the proposal been considered acceptable in other regards, a planning condition would have been attached to address this issue.
- 6.7.24 The pedestrian and cycling environment in the vicinity of the station is mixed. To the east, although London Road is busy, the service roads on either side do provide a quieter space however, the observed ‘rat-running’ at peak times can make this feel less safe as drivers try to avoid queuing on the main carriageway. The journey to the west is more exposed to the traffic and points for improvement have been suggested in the ATZ assessment which should be explored further eg. additional pedestrian crossing and seating. In the event that planning permission is granted such additional measures could be secured through section 106 agreement.

Car Parking

- 6.7.25 The proposal is for a car free development and as such will only provide disabled parking spaces in accordance with London Plan (2021) standards.
- 6.7.26 During the pre-application process the Highways Authority raised concerns about the suitability of the site for a car free proposal and the Transport Assessment includes a study in response. The location is rated as PTAL 4 due to the presence of the Underground station and bus interchange. The area surrounding the station is rated 3 and this drops to 2 and eventually 0 further away. In real terms, there are buses and the tube station which clearly means that for those who wish to travel by public transport there are good options available and the

shopping area of Stanmore is within a reasonable walking distance for most able people.

- 6.7.27 It is understood from the profiling provided that anticipated residents are quite likely to be fairly low income, young people who are statistically less likely to own cars and travel by public transport. This is accepted based on the information provided however, there are a lot of families expected too which is more likely to result in car ownership. Based on officers experience in Harrow, we know that some residents of existing car free developments do still own cars but park them elsewhere and when families grow, car ownership tends to be an expectation too. This has happened in locations that are even better served by public transport than the Stanmore station site.
- 6.7.28 It would not seem that there is a significant demand for car parking generated by the borough's existing car free or car-lite developments however, there is a demand that could have an impact on the surrounding highway network in Stanmore. The parking surveys undertaken in the CPZ's around Stanmore Station (zones B, H and HB) have demonstrated that outside of operational hours, many roads can be heavily over capacity – the existing situation means that there is insufficient space to accommodate any additional parking demand throughout large parts of the CPZ area. Historically car ownership in Stanmore has been very high. The development combined with the reduction in public car parking at the station has the potential to increase the pressure further unless changes to the hours of restriction are made and residents of this development are prevented from obtaining parking permits. For this reason, it would be necessary to monitor on-street parking in the area surrounding the development before and after occupation to determine whether alterations to the CPZ hours are required. A contribution to fund the assessment and possible alterations would be required and could be secured through section 106 agreement should planning permission be granted.
- 6.7.29 Highways officers have outlined It would be more appropriate to provide a car-lite scheme where some parking is provided for the new residents so that the existing streets are not dealt a double blow as a result of this development. This would mean that car free living could still be expected from most residents but for those that would benefit from affordable housing but still need to rely on a private car (eg. a community midwife, health visitor or night-shift worker) there would still be some provision. The aspiration to provide car-free developments in Harrow is supported in suitable locations but realistically the characteristics of Stanmore with its high car ownership, traffic congestion, hilly geography and low PTAL do not suggest the best circumstances for large scale, car free living.
- 6.7.30 The car club space is supported although the location needs to be determined; the TA mentions this being positioned within the basement car park but the RSA drawings show it on-street outside Block A. The on-street location is preferred as the car is visible and the space is easily accessible. The car club space could be secured by condition in the event that planning permission is granted.
- 6.7.31 Highways officer have outlined that the proposed layout for parking on-street is acceptable but noted there doesn't seem to be any disabled parking provision for

the southernmost buildings. The applicant has advised that the area to the south end of the site is the works area for London Underground engineering vehicles, therefore the provision of active accessible parking bays in this area has been avoided to reduce inconvenience for residents.

- 6.7.32 Electric vehicle charging points must be provided in accordance with LTP London Plan requirements; 20% active and 80% passive. Officer consider the active and passive accessible parking layout could be secured by condition.

Cycle Parking

- 6.7.33 The proposed levels of cycle parking are acceptable. Final details of the stores can be secured by condition, should planning permission be granted.
- 6.7.34 The cycle hub is welcomed and will hopefully encourage some commuters to travel to the station by cycle however, officers consider that this must be accompanied by other measures to encourage the desired modal shift.

Trip Generation

- 6.7.35 The trip generation methodology was previously agreed with the Highways Authority, however the redistributed modal splits are heavily weighted towards underground trips but following the events of the COVID 19 pandemic this year, it is possible that more people will continue to work from home at a higher rate than previously seen which may result in a reduction in daily tube travel. As the development is intended to be car free it can still be assumed that the majority of trips will be made by other sustainable modes in any case.
- 6.7.36 As expected, this development has the potential to reduce the current number of car journeys associated with site as the car park capacity would be reduced and the residential element would generate very few car journeys. The residential development would increase public transport use however the TA includes an assessment of public transport impact that shows that there is sufficient capacity.

Delivery and Servicing

- 6.7.37 In relation to security the applicant has outlined that the proposed basement public car park will be access controlled and managed by a car park management company. However, the applicant outlines that the site access will not be access controlled. The applicant has also advised that the private accessible parking spaces will be managed to avoid any undesirable parking but the details for how this would operate is not clear. As outlined above, the Highways Authority considers further measures in relation to the management of the site access road are necessary and could be addressed through a suitably worded planning condition.
- 6.7.38 In respect of monitoring, the Highways Authority have outlined that the delivery monitoring survey schedule along with details of the person responsible for monitoring should be included alongside the Travel Plan requirements. This could be secured via s106 agreement.

- 6.7.39 In addition, it would be necessary to secure a detailed Delivery and Servicing plan by condition, should permission be granted.

Construction Logistics Plan

- 6.7.40 The outline plan provided is considered to be acceptable and officers consider a detailed plan should be secured by pre-commencement condition in the event planning permission is granted. The plan must follow TfL guidance and should only be submitted when the contractor has been appointed and all required details are known.

Parking Design and Management Plan

- 6.7.41 The provided information is considered to be acceptable, however there are some details that are yet to be confirmed as a parking operator has not yet been appointed. As such a full, detailed document should be provided prior to occupation which can be secured by condition.

Rail Replacement Bus Service Strategy

- 6.7.42 A rail replacement bus service strategy is required for the site, as part of the TfL Infrastructure Protection requirements, to ensure the residential development proposals do not compromise these operations at Stanmore station. The rail replacement buses currently use the station public car park for turning and holding coaches before pick-up at the station entrance, however this strategy will be amended as part of the development proposals.
- 6.7.43 The rail replacement buses for Stanmore station will be parked in two areas:
- The TfL Staff Car Park on London Road, east of the junction with Merrion Avenue; and
 - The inset bays along the west edge of the site access road on-site, next to Block A-D.
- 6.7.44 It is noted the proposed rail replacement bus service operations will be undertaken on private land, with no waiting or loading / unloading of passengers within the public highway. The strategy has been set out for information only as the strategy was not provided in the Transport Assessment.

Framework Travel Plan

- 6.7.45 A Framework Travel Plan has been submitted to provide the good practice mechanisms necessary to achieve a modal shift towards a more sustainable mode of travel. The measures would include marketing and promotion of sustainable travel modes and the provision of cycle parking spaces in accordance with London Plan standards. Implementation, monitoring and management of the Travel Plan would be undertaken by an appointed Travel Plan co-ordinator who would work in partnership with the Council and TfL.

- 6.7.46 The application was referred to the Council's Travel Planner who has provided further clarification on the specific detail that should be provided within the Travel Plan and its monitoring. A Full detailed Travel Plan for the residential development will therefore need be submitted post permission and secured via a section 106 Planning Obligation, in the event that planning permission is granted.

Conclusion

- 6.7.47 The proposal to redevelop Stanmore Station car park to a residential development of 277 dwellings and a 300 space public car park has been considered as set out above. In terms of highways impact, the proposed development is expected to result in a reduction in car trips and an increase in trips by other modes. The principle of a residential development is feasible for this site however a large scale, car free scheme combined with a reduction in public car parking is considered unsuitable for the location as it is likely to result in harm for the surrounding highway network due to insufficient mitigation measures.
- 6.7.48 The potential for overspill parking from the residential element is still considered very likely as is the potential for parking demand associated with Wembley events.
- 6.7.49 In order to address these concerns, more would need to be done to make walking and cycling a priority between the site and Stanmore town centre. The measures Wembley are proposing are positive but will not really address the situation at Stanmore as the Metropolitan Line and Chiltern lines do not serve the locations to the north where we expect many people are travelling from; stopping the promotion of the station would be helpful too but that won't stop people from using Stanmore anyway. Highways officer consider that the CPZ review is absolutely essential as the current hours of control will not be sufficient. A financial contribution of £10k would be required for surveys and £40k for implementation, all to be undertaken by the Council. This could be secured by section 106 agreement.
- 6.7.50 Overall, Highways officer do not objection to the proposals subject to further mitigation measures being agreed. Although, it is considered that the level of mitigation already agreed to deal with potential parking issues should be sufficient, officers consider that mitigation in the form of measures to enable sustainable travel need to be increased. This could include improvements to the corridor between the site and through Stanmore town centre, such as the introduction of a 20mph zone as well as improved cycling facilities in relation to the proposed cycle hub. This would require a further financial contribution of 20k which could be secured through section 106 agreement.
- 6.7.51 The additional financial contribution to secure additional mitigation combined with the proposed cycle hub, travel planning measures and alterations to the surrounding CPZ's, would make the car free proposal and reduction of public car parking acceptable in Highways terms, and so would satisfy the above policy requirements.

- 6.7.52 Officers acknowledged that a large number of representations have been received in relation to parking issues and these are considered in the above appraisal. Residents have also queried the accuracy of the surveys undertaken in the Transport Assessment. It is acknowledged that there is a lot of detailed, technical information across various reports and this can be quite confusing. We need to first understand the intentions of the application; the car park is a private facility that is open to the public. It has been made clear within the submission that the assessments were meant to support the proposed reduction in car parking provision as desired by the applicant. They were not intended to demonstrate an appropriate level of car parking provision, rather, what the effects of reduction could be and the potential for modal shift. TfL and Harrow both seek to reduce car travel and increase sustainable travel in line with national, regional and local policies. The applicant isn't seeking to justify the proposed reduction in capacity; the Council need to establish that the residual effects would be acceptable, and officers consider that with appropriate mitigation, this will be the case.
- 6.7.53 Several of the comments relate to a figure of 555 quoted in appendix F – this was actually not an amount of people surveyed but the level of parking demand across a day (entries and exits).
- 6.7.54 Whilst station users have enjoyed the benefits of access to a large car park, a reduced facility will mean that some people will have to change their current travel patterns. The assessments demonstrate that there are other options available and that there is the potential for change.
- 6.7.55 Highways officers are satisfied with the information received and believe that it is a fair representation of the existing situation and the anticipated impact of the proposal.
- 6.7.56 Overall, and subject to the planning conditions and s106 obligations mentioned above, officers consider that the transport impacts of the proposal are acceptable and would accord with the aim and objective of the relevant policies.

6.8 Landscape and Ecology

6.8.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan (2021): G5, G6, G7, G8
- Harrow Core Strategy (2012): CS1
- Harrow Development Management Policies (2013): DM20, DM21, DM22, DM23

Landscaping

6.8.2 The proposed development scheme has been the subject of several pre-application meetings, including design workshops with redesign of various parts of the masterplan and various iterations of the scheme with some improvements. The proposed 'Villa' blocks were moved, to take account of the Site of

Importance for Nature Conservation - SINC area (SINC designated as Grade II site of Borough Importance for Nature Conservation) to the rear of the Villas, slightly reducing the impact of the proposed buildings on the SINC. An improvement was also made by the reduction in height of the car parking podium to a single level with a landscaped podium. Building Blocks A and B were redesigned and Block A footprint relocated to sit further back away from London Road. The development proposals have evolved over time and the Design Review Panel were consulted and have made substantial contributions to the design process.

- 6.8.3 The proposed development site is highly constrained, narrow and linear in shape, with a significant level change of approximately 8 metres from London Road in the north to adjacent to the TfL yard in the south. As a result the narrow site and the proposed flats and townhouses on both sides of the access road there is limited opportunities to create a green living landscape to soften the impact of this high density development, to provide a meaningful soft landscape setting.
- 6.8.4 Building A on London Road has been slightly set back although insufficient to provide a suitable setting and a sufficiently wide soft landscape/ public realm to be in keeping with the existing generous, wide existing landscape frontages around Stanmore Station area and Kerry Avenue Conservation Area. The opportunity to improve the public realm outside the station is not part of the application, the creation of a more generous pedestrian arrival space and soft landscape, rationalisation of the car parking and bus stops improvements is not being pursued which as discussed above would have afforded much greater weight in relation to public benefits.

Stanmore Landscape and Public Realm Strategy

- 6.8.5 This proposed new public space is supported and works successfully with the existing levels to create terraces and vantage points, producing interesting spaces to sit and enjoy, play in or pass through. Overall, it is considered that the proposed improvements to the Public Realm would work well, however, as noted above, the space is limited
- 6.8.6 There are some concerns with the 'No-mans' land gaps between the development site western site boundary and adjacent land owners boundaries. This area potentially could become messy, overgrown and out of control and would require very careful management to ensure the maintenance strip works and self-sown vegetation, litter, dumped rubbish doesn't impact on the neighbouring properties. There is a very narrow 1.2-metre-wide maintenance strip which would need to be retained and well maintained. A robust detailed management and maintenance plan for the existing vegetation to be retained, shown would be required in order to understand how this vegetation could be retained during the construction works and how the vegetation would be controlled in the future, after the podium was in situ. It is considered that this detail could be secure by planning condition in the event planning permission is granted.

Podium

- 6.8.7 Similarly, the 'buffer' strip of planting shown on the Landscape Masterplan, which runs along the boundary of the rear gardens of Westbere Drive and the access road into the site is minimal, narrow, at about 1.3 metres wide. The planting and trees would not form a screen to the podium area for the properties in Westbere Drive. The Council's landscape architect considers it is doubtful that retention of the existing vegetation during construction of the proposed podium would be possible. The proposed podium planter would be 1 metre wide which is also considered to be very narrow. Officers also have concerns that this planter would not be a realistic proposal to sustain soft green planting. Irrigation would be essential together with a very regular management and maintenance regime to ensure plant growth and plant replacements, when required. The selection of herbaceous planting would be insufficient to provide visual impact and much needed screening and an unsuitable choice. Any proposed planting should be realistic and meaningful. Again, this detail, could be secured through detailed landscape conditions.
- 6.8.8 As noted elsewhere in this report, the proposals show a high wall to the podium, parapet wall and metal railing balustrade, this would be unattractive in some view from the houses in Westbere Drive. The height of the podium would vary along its length and at its highest would be around 3.4metres, in addition to the the height of the maintenance staircase which is 4.27metres. The indicative back garden fence has been shown at 2.54metres. Although, not considered to warrant a reason for refusal, given the indicative proposed landscaping, depths of the adjacent gardens and varying heights, it is considered that this hard edge condition is unneighbourly and exacerbates the concerns raised in relation to the excessive scale and massing of block C and D which would have an overly dominant and oppressive visual impact for some of the neighbours. It is noted that given, the narrow width of the maintenance zone, it would not be realistically possible to provide any meaningful screening or softening of the development for the Westbere Drive properties.

Social Street

- 6.8.9 The design has evolved through pre application and it is considered podium car park for buildings B and C have greatly improved the proposed public realm with more generous space providing a more welcoming environment for pedestrians and cyclists.

Communal Garden

- 6.8.10 The Council Landscape Architect has raised some concern about the size and extent of usable shared amenity space between the flats together with the potential overshadowing issue created by the buildings and in some spaces the proposed tree planting. Officer acknowledge that the spaces between the blocks C - D and D - E are tight in relation to the height of the blocks. Nevertheless, overshadowing and wind analysis have demonstrated that the microclimate conditions in the amenity spaces would be acceptable. The applicant has also sought to provide other precedent examples of comparable sites which demonstrates that the spaces could work successfully

Community Gardens

- 6.8.11 The indicative images provided indicate that an attractive space could be achieved. High quality hard materials, street furniture, pergolas, planting, boundary treatments including decorative wall / gate and other elements including biodiversity elements have been proposed. The Council's Landscape Architect has outlined that the proposed elements are attractive and supported but the proposals need to be practical, robust and realistic and assurance would be required that these proposals will be carried out and implemented, rather than any subsequent value engineering and removal of high quality elements at the detailed design stage. As noted elsewhere an architecture retention clause could be secured via section 106 agreement to ensure that the landscape proposals are delivered to the highest quality as shown on the drawings.

Social Street – Townhouses

- 6.8.12 The proposed Townhouses, Blocks E1 and E2 have proposed ground level private amenity space set in a narrow linear space, the gardens to the family homes in the main are very small. Nevertheless the townhouses would also benefit from a good level of defensible space to the street as well as generously sized terraces at roof level providing and first floor balconies providing a variety of amenity spaces.
- 6.8.13 It is noted that some of the back gardens would be very short in some cases. However, indicative sections have been provided which indicate that due to level differences, rear facing windows would have outlook over the rear maintenance boundary wall which would help to improve outlook and reduce the sense of enclosure to these spaces. On balance taking account of the proposed defensible space and first floor balconies and roof terraces proposed, the amenity provision is considered to be very good for the townhouses. Nevertheless, it is considered that the boundary condition to the railway lines should incorporate a buffer element either through planting or other softening treatment to improve the impacts to the townhouses as well as the adjacent blocks B, C and D and this could be secured by condition
- 6.8.14 It is noted that 2 bins per house appear to have been proposed but 3 bins would be required. It is considered that there would be scope to provide a further bin in the defensible space area which could be secured by condition, should planning permission be granted.

Wildlife Garden and SINC Boundary

- 6.8.15 During pre-application discussion, it was requested that the Woodland 'Villas' were moved forward, away from the SINC, to reduce the impact on the SINC, including the existing trees. The Villas were slightly turned, but not moved away.
- 6.8.16 The proposed villa blocks F, G and H would be sited uncomfortably close to, and within part of the SINC resulting in encroachment on the neighbouring SINC, with loss of part of the SINC. The Council's Landscape officer has raised

concerns in relation to the potential detrimental impact on the SINC in relation to construction works of the proposed flats and the additional pressure of people, domestic animals and additional lighting on the ecology and the habitats, together with the loss of existing trees. This is discussed in more detail below in the following section of the appraisal.

- 6.8.17 There are some concerns that the retained existing trees to the back of the flats would create shade and take light from the windows and it is of concern that there could be post development pressure to remove the trees in the SINC or the trees in between the buildings, as the trees grow, increase in size, height and spread covering windows. New tree planting would require careful consideration to select appropriate locations and species. Officer consider this aspect could be conditioned.
- 6.8.18 A number of the existing trees in the SINC behind the villas would need to be removed in order to build the flats. Additional trees would need to be removed to enable sufficient space to build and, tree roots would need to be severed during construction for foundations / physical construction works / nearness of crown spread of tree to the new buildings. 22 trees and 6 tree groups and the partial removal of four tree groups, including one 'A' grade tree are proposed to be removed. In addition there will need to be tree pruning works to minimise the potential damage during the construction works. Some works will also have to take place under the RPA's (Root Protection Areas) of existing trees. The tree report notes that retained trees will not cause a significant shading impact on primary living spaces and as such it is not considered that a significant conflict between retained trees and the proposed properties as a result of shading will occur. This statement is noted, however, the existing trees are situated very close to the flats and bedrooms, creating shade and causing a loss of light in the internal rooms of the flats, even if bedrooms. As stated above, this is likely to cause some future post development pressure from the residents for the pruning and / or removal of the trees. It is considered that detailed management proposals would need to be put in place to address this point which could be secured by condition.
- 6.8.19 The TfL requirement for a large space for crane movement and a 3 metre maintenance zone in the southern part of the site, compromises the ability to provide further soft landscape in this part of the site. The crane maintenance area would impact on the SINC area and building layout. Reinforced grass / wildflower grass for the occasional use of a crane is proposed over the majority of the amenity space between Blocks F and G and in front of Blocks G and H. The landscape officer considers that the reinforced grass area and details of an appropriate grasscell type product would be required to ensure the area is successful, subtle and discrete as possible.
- 6.8.20 Soft landscape and tree planting is proposed between the villa blocks to mitigate the loss of existing trees and vegetation in the SINC. The Landscape officer has outlined that careful consideration needs to be given to the selection of new tree species for planting around the Villas as some of the proposed native species, such as hornbeam, bird cherry, lime and even native birch grow very large and may be inappropriate in the locations shown. Some of the trees would over time

be likely to grow too large and may create unattractive densely vegetated amenity areas. In order to address this, a planning conditions would be required for detailed hard and soft landscaping proposal to demonstrate an appropriate selection of tree species at an appropriate distance from the proposed buildings and this could be secured by condition.

- 6.8.21 Officer consider that the lighting strategy in the area of the SINC would be particularly important to ensure there is limited impact on the wildlife of the area. It is recommended that this be secured by condition, if planning permission is granted.

Green Roofs, Rain Gardens, Habitat Structures and Bird/ Bat Boxes:

- 6.8.22 The proposal outlines the inclusion of various items within the development and broadly indicates the location but do not provide any detail, notably: reinforced lawn or wildflower turf, biodiverse green roof, habitat structure and bird/ bat boxes. Officer consider that planning conditions would be necessary to secure the detailed proposals for these elements to ensure compliance with the relevant policies and to ensure the development makes a positive contribution.

SUDs, Boundary Treatment, and Surfaces Finishes:

- 6.8.23 The proposals include indicative details and images of SUDs, proposed boundary treatment and hard surface finishes. The Landscape Officer has raised no objection to these elements, subject to securing detailed proposals by planning condition.

Landscape Maintenance

- 6.8.24 The proposal provides minimal information on the future maintenance of the amenity spaces, some of which will require high quality, regular, intensive maintenance. The proposed amenity spaces are multifunctional and have to work hard to stand up to the intensive use. Officers consider the design and specification of appropriate plant mixes for the situation will be very important. The amenity areas will vary in character across the site, some areas being adjacent to semi-rural area type such as the SINC area and others contained by the built form, such as the communal gardens. As such, the management and maintenance requirements will vary across the site. It is considered the details of landscape maintenance could be secured by condition.

Play Strategy

- 6.8.25 The play strategy includes a mixture of informal play space and incidental play space throughout the public realm streetscapes. A series of communal gardens throughout the site would provide a place for children and families to play on their doorstep. A play trail is also included along the social street. The Council's Landscape officer has raised concern with some of the narrow play trail elements along the streets outlining due to the narrowness of these space they are unlikely to be successful and as such two spaces have subsequently been removed. Additionally, it is recommended that if planning permission is granted, a condition is attached that requires the play rail beds to be paved over in the event that they

fail due to intensity of use. It is considered that the play elements should be incorporated within the landscape and if possible be multifunctional and these details could also be conditioned.

Trees

- 6.8.26 An Arboricultural Impact Assessment produced by MiddleMarch Environmental has been submitted with the application. The report details that the proposed development has been designed so that, where possible, existing trees are retained. It is also acknowledged that some of the tree are high quality. However, the proposed development would necessitate the loss of 22 trees. The proposed new scheme would also deliver 22 new trees which would help mitigate the losses to some extent. The loss of trees on this site is clearly regrettable and the concerns expressed from neighbouring residents in relation to their loss are noted. However, the planting of new trees as well as the creation of new landscape spaces will help mitigate their loss, enhancing the sustainability and biodiversity of the site and contribute to the green infrastructure of the locality. Furthermore, the loss of trees on the site must be weighed in balance against all other material planning benefits of this proposal as noted elsewhere in this report. Having regard to the net gains in trees overall, officers consider that the harm that would be caused by the loss of the trees is strongly outweighed by the realisation of wider planning objectives.

Conclusion

- 6.8.27 Officers consider that that the proposed Landscape Strategy is appropriate to the proposed development and the constraints of the subject site. The proposal would provide a well-defined and enhanced pedestrian route along the new internal street and would include street trees, play trails and communal gardens which would positively enhance the streetscape and public realm and contribute towards the aspirations of the Mayor's Healthy Streets initiative. There are some concerns in terms of the relationship of the site to its surroundings, particularly in respect of the western and eastern boundaries of the site as well as the impact on the SINC and post development pressure from the woodland villa buildings. Planning conditions could be used to secure further information to help mitigate these concerns. The Council's Landscape Officer has highlighted areas where further information will be required to ensure that the Landscape Strategy's proposals can be effectively realised. On balance, taking account of the need to make effective use of this brownfield site, the hard and soft landscape proposals are considered to be acceptable, subject to conditions.

Biodiversity

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

site is a relatively weak link. Any residual impacts on this following mitigation will need to be addressed.

- 6.8.29 The wider SINC area has some lateral green links to the Borough Grade II SINC's of Stanmore Marsh and Canons Lake and the Basin but the area of the borough south of the site is highly deficient in provision of access to nature and the benefits which this offers. The biodiversity officer has indicated that Consideration should be given to this when accessing the impacts of the proposed development and its ongoing use.
- 6.8.30 The application is supported by a range of information including an Ecological Impact Assessment (ECIA) following on from a Preliminary Ecological Assessment (PEA).
- 6.8.31 There is an area of woodland within the SINC located to the south east of the site which will be affected by the development proposals. The total area affected by the development footprint is 763sqm and the total area affected by construction to be replanted is 667sqm.
- 6.8.32 Policy G6 of the London Plan 2021 sets out the mitigation hierarchy in situations where harm to the SINC is unavoidable and where the benefits of the proposal would outweigh biodiversity harm. In such instances the following mitigation hierarchy should be applied to minimise development impacts:
- 1) avoid damaging the significant ecological features of the site
 - 2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
 - 3) deliver off-site compensation of better biodiversity value.
- 6.8.33 Local Plan policy DM 20 requires that where loss of an existing biodiversity feature is unavoidable, replacement features of equivalent biodiversity value should be provided on site or through contributions.
- 6.8.34 The applicant outlines the proposals have been designed to minimise unavoidable impacts to the SINC, noting that there are number of constraints on the southern part of the site including the requirement for TFL crane access and a 3m wide maintenance zone and the need to maintain separation distances from adjacent residential properties. It is set out that the proposals have been designed to respond to these individual constraints and minimise unavoidable impacts on the SINC by:
- Placing the buildings on the edge of the SINC and designing proposals to ensure the edge condition and boundary treatment proposed is suitable and would limit impact
 - Not placing any routes through the SINC – either pedestrian or vehicular – to avoid wider impact such as air pollution
 - Revising the internal layout of the properties to place internal spaces which would use less artificial lighting, such as bedrooms to the rear to limit impact on light spill
 - Including gaps between the buildings to facilitate and maintain movement corridors for wildlife

- Avoiding the TPO area located on the eastern boundary of the site

6.8.35 The applicant has provided a SINC mitigation report which sets out a green infrastructure strategy for the development, including a planting and tree planting strategy, SUDS strategy and green roof strategy. The applicant considers that this would offset any residual impact on the SINC area following the enhancement of the woodland through a comprehensive management plan. It is suggested that the proposal would have an Urban Greening Factor of 0.5 which would exceed the target of 0.4 set out under policy G5 of the London Plan. For these reasons the applicant considers that compensation is not necessary or justified.

6.8.36 Overall, the applicant asserts that the impact on the SINC has been avoided as much as possible and that the direct and indirect impacts would be minimal.

Appraisal

6.8.37 A bat roost emergence survey of the station buildings, indicated roosting use but no information has been presented in relation to the extent to which bats use the site, particularly the SINC area as a commuting route or for foraging, despite the recognition of its importance as a green corridor. *“The woodland does however provide a high-quality linear feature for foraging and commuting bats within a landscape dominated by urban development and high levels of disturbance”.*

6.8.38 It is accepted that the car park area itself is presently of very limited value for biodiversity, with the existing trees of greatest value, some vegetation at the margin with the SINC and some weedy plants in cracks and gaps in the hard surfaced areas. Officers consider that provided appropriate measures for mitigation and biodiversity gain can be agreed to meet NPPF and local plan policies and provide the level of green infrastructure expected by the Mayor’s Urban Greening Factor there should be no biodiversity objection to the development of this area..

6.8.39 However, in officers opinion, the woodland is of relatively high value within the immediate vicinity and whilst it might appear reasonable to suggest that the proposed loss is minor in relation to the size of the SINC of which it forms part, there are two points to be addressed in this regards

- (1) Local plan policy is for the loss of existing SINC areas to be resisted and, in connection with the BAP and the Councils recognition of the biodiversity and climate crises to increase the overall protected area
- (2) The green corridor is already narrow at this point and what remains would be forever subject to adverse indirect impacts from the proposed development

6.8.40 As such, the Council’s biodiversity officer considers that the EclA conclusions are therefore not acceptable but it should be possible for the applicant to enter into some biodiversity offset arrangement to ensure that both points can be addressed and positive gain provided in this regard.

6.8.41 The EclA fails to recognise the significance in of the reduction of the corridor and the indirect impacts on it as well as the lighting of the wider area development

area in its assessment of its future value as a commuting route/ foraging area. However, elsewhere the report notes that “*Damage to individual sites may alter the distribution of valuable habitats within the borough or lead to fragmentation of ecological corridors which provide connectivity at the scale of the borough*”..

Indirect Impacts:

- 6.8.42 The permanent presence of a large resident community adjacent to the remnant SINC area will inevitably mean that a range of factors will impact adversely on its remaining value. Whilst it might be assumed that the management company will maintain a fence to prevent direct access, litter and fly tipping, normal communal activities and both domestic pets (especially cats) and vermin associated with the development will necessarily have an impact on small vertebrates and invertebrates that presently use the sites. This includes the bird population which is the only group for which a formal survey has been conducted. Whilst there will be some cat predation currently, the development would add significantly to this. Any claim otherwise, regardless of the fact that not all or the dwellings will be flats, should be set aside. There appears to be no formal evaluation of cat predation and the precautionary principle should apply.
- 6.8.43 Birds: Whereas it will be possible to make provision for the nesting of some of the breeding species within the site and provide opportunities for others (swift, starling, kestrel) the changes resulting from the development will impact negatively on the breeding bird population. This could be addressed via the proposed compensatory woodland planting, however.
- 6.8.44 Badger: Whilst it is not considered that badgers are present within the development site, the suggestions as to its unsuitability by the submitted report are not wholly accepted by officers.
- 6.8.45 Amphibians: If frogs, toads or newts are using the pond for breeding purposes they will certainly require suitable habitat elsewhere in the year. It is therefore more rather than less likely that this includes parts of the development site.
- 6.8.46 The main concerns are in relation to the SINC in respect of impacts associated with
- the loss of value of high value habitat (and of the potential to improve this)
 - the proximity of the buildings and the degree of shading of the vegetation
 - an increased zone of disturbance within the margin of the SINC area which might affect breeding birds
 - lighting on the behaviour of bats and their prey
 - increased obstacles to the movement of wildlife, e.g. hedgehog and reptiles
 - increased populations of cats and rats
- 6.8.47 Whilst there will undoubtedly be some degree of impact in relation to most of these at present, the scheme will be likely to increase these. The applicants assertion that the increased impact from cats (and dogs) will be negligible because the development comprises apartments has no basis, however.

- 6.8.48 The creation of habitat likely to be of value to reptiles within the development site is very minor – with no surveys having been undertaken to demonstrate their presence on the embankment – and with the intervening
- 6.8.49 In the absence of any surveys of the use of the this section of the SINC as a corridor by the various bat species recorded in the near vicinity, it is difficult to appraise the likely impact of internal and external light pollution on their commuting behaviour.
- 6.8.50 With the quantum of development there is likely to be a noticeable increase in visitor pressure on parks and open spaces within the area including the Canons Park part of the SINC. There appears to be no recognition of the need to address this within the submitted report.
- 6.8.51 Overall, the applicants' approaches to net gain and the attempted justification of the loss of an area of land designated for conservation purposes are not accepted. The LPA does not consider it acceptable for a net gain approach in which the redevelopment of an identified brownfield site, of little or no existing biodiversity value, and the welcome improvement which this should be expected to bring to justify either the partial loss of a designated wildlife site or the degradation of a site or remnant site that will be subject to ongoing impacts that will inevitably result in a cumulative loss of breeding species and the biodiversity value of the site.
- 6.8.52 During the course of the application, the Council's biodiversity officer advised that provided necessary measures are agreed to and undertaken in accordance with conditions that will need to be set, it should be possible to remove objections that remain on biodiversity grounds but this will require the applicant to adopt a different approach in relation to the loss of the established SINC woodland and the associated impacts on the green corridor of which it forms part.
- 6.8.53 The applicant was advised to adopt the following approach to overcome the concerns in relation to biodiversity
- Quantify the SINC area to be lost
 - Using either their own land or via some arrangement with another landowner, to make arrangements to permanently provide an area of woodland that will either be of equivalent or greater quality and equivalent or greater value such that the overall increase is between 15 and 20%.
 - Re-run the net gain calculations, so that where wildlife benefits only incidentally (e.g. the wildlife gardens), there will be indirect impacts on retained habitat (e.g. the remnant SINC), or features are provided to meet other obligations, e.g. drainage requirements, these are downgraded or removed from the calculations as appropriate
- 6.8.54 Further commentary was provided by the applicant during the course of the application to address the above issues, but this was considered to be unacceptable by the Council's biodiversity officer and did not seek to address the fundamental issue of compensation which is considered necessary to make the development acceptable.

- 6.8.55 A more modest development could be built without encroaching directly on the SINC and would be in accordance with the expectations that have been flagged up from the very earliest stages of the development proposal process. Impacts could be duly avoided. However, the applicant has continued to pursue the proposed scheme. With other constraints on the site which they are being placed ahead of the biodiversity interest, this would result in a loss of SINC designated area and priority habitat, as well as ongoing negative impacts on what remains of the wooded strip alongside the development and, in particular, the role which the existing belt of woodland provides in connecting the local ecological network.
- 6.8.56 With reference to Paragraph 175 of the NPPF the harm resulting from the development will not be adequately mitigated under the proposals as presented. Therefore, officer consider compensation will therefore be required. In order for the scheme to be acceptable there would need to be an equivalent or greater area of land provided that, within a set time frame would achieve of SINC quality and which would provide like for like or better replacement of the area of woodland habitat that will be lost. Officers consider there are opportunities to address this within the immediate vicinity of the development site or potentially elsewhere along the green corridor but the applicant has elected not to pursue these opportunities.
- 6.8.57 The applicant is seeking instead to rely on mitigation and enhancement within the development redline, basing their proposals mainly on a biodiversity net gain approach which is considered to be flawed in several ways.
- 6.8.58 Firstly, the majority of the area comprises car park with an impermeable hard surface which is necessarily of very low value for biodiversity. The promised aggregate net biodiversity accordingly suggests a gain in terms of biodiversity and it is suggested that the existing woodland is of low or moderate quality and that enhancement of what would remain would mitigate the loss. Whilst it would be possible to secure enhancement, protection and ongoing management and monitoring of the remnant area in perpetuity - although the applicant has not put forward any proposals in relation to the detailed agreement or funding that would be required to sustain this, it must be recognised that this would result in a net loss of woodland and a weakening of the green corridor, neither of which are factored into the biodiversity net gain or urban greening factor calculations. Moreover, these also fail to take account of the fact that there will be additional and increased pressures on the remnant which remains which will actually reduce its value and increase predation risks.
- 6.8.59 Whilst the standard biodiversity metric is a useful tool for evaluating impacts, mitigation and enhancement proposals should ideally be used to guide scheme design in accordance with the full mitigation hierarchy, it has no regard to species and their ecological needs and vulnerabilities nor to indirect impacts of development. It is also not intended that net gain for biodiversity be used to substitute one habitat with another or lesser.
- 6.8.60 There is also a risk that were the applicant's approach to be accepted it could be used elsewhere to justify the loss of existing areas of designated or otherwise

valuable habitat adjoining habitat within a development red line where the majority of the site is of low value. This goes against the mitigation hierarchy and should not be resisted, particularly in London where there is already so little in the way of land available that is either of existing or potential high value which is already critical to or could be used to make local ecological networks more resilient in the face of negative pressures that are set to increase as the climate changes and the population increases. In particular, development should seek to strengthen rather than weaken or otherwise undermine green corridors.

- 6.8.61 This is not to suggest that development which might directly and/or indirectly impact on a SINC or woodland shouldn't be permitted where there are over-riding reasons to do so but any such development should provide appropriate mitigation and, where what can be achieved within the development site redline will be inadequate to the purpose this should be recognised at an early stage and appropriate offsite compensation measures factored into the strategy for mitigation and enhancement. Whilst onsite mitigation will generally be preferred where it makes ecological sense, where this is not the case – which would not represent sustainable development – compensation instead or as part of the overall approach will be required.
- 6.8.62 The Council's preferred approach would be to assess the SINC area and the rest of the development site separately, with an area of woodland at least equivalent to what will be cleared being created in compensation, ideally to strengthen the green corridor in the vicinity of the develop site. Without this the proposals would not be acceptable in biodiversity terms in Harrow nor in London.
- 6.8.63 In terms of the mitigation hierarchy set out under policy G5 of The London Plan (2021), the proposals fail at point 1. There will be very definite direct and indirect impacts on the site's ecological features and their function.
- 6.8.64 At point 2, other considerations will result in direct impacts and indirect impacts and these will not be adequately addressed by the mitigation proposals The Urban Greening Factor (UGF) and Biodiversity Net Gain (BNG) calculations do not take account of the critical factors. It would appear that whichever GLA officers reviewed the proposals considered only the provided figures without reference to the consequences of the direct and indirect impacts involved, ecological function or the expectation that habitat be replaced on a like for like basis.
- 6.8.65 The affected SINC area lies in close proximity to the east of the proposed development and so will be shaded by the very tall buildings during that part of the day when the sun is in the western quarter. The applicant needs to revise their response to this point. Whilst the applicant recognises that the woodland is key habitat for bat foraging and commuting, they have not evaluated what the impact of the reduction will be. One point is that light spilling from internal and external lighting will not on be much closer to the far (eastern) edge of the woodland and another is that with a reduced belt of trees, more of reach here. Whilst there is reference to standard approaches for minimising lighting impacts no information has been presented as to what the actual light levels along the surviving corridor will be at different times of or not this will impact adversely on

bats and their prey or other nocturnal species, beyond the direct impacts of habitat loss, and the function of the green corridor. This is a further argument in favour of strengthening the green corridor at this point.

- 6.8.66 The applicant here claims that the proposals will strengthen the green corridor, but the reality is that the belt of woodland will be much reduced and subject to ongoing and much greater negative impacts. Whilst the expected green elements of any residential development will have some biodiversity benefits these will not address the consequences of the reduction in the woodland belt. The applicant should either provide evidence in support of their claims or move to address these impacts as suggested above.
- 6.8.67 Whilst a management plan and the means to implement it in perpetuity, will be required in any case, the existing proposals won't allow for the mitigation of the reduction in woodland. The existing woodland is rather different in character to anything that would be provided within the residential area. There appears to have been no consideration of the species which will be advantaged or disadvantaged and their relative conservation status. rather There will also be significantly increased predation risks.
- 6.8.68 Taking account of the London Plan policy and Local policy requirements, officers consider that the starting point for enhancement is in the form of compensatory land along the existing green corridor or other appropriate location which will directly address the harm. However, the applicant has not sought to pursue this. It is suggested by the applicant that the benefits of the scheme, include the overall housing delivery and the need to make efficient use of a brownfield site would outweigh the harm but as set out in policy G5 the benefits of the scheme does not negate the need to comply with the policies requirements of the mitigation hierarchy.
- 6.8.69 The proposal is therefore considered to be unacceptable in relation to biodiversity impacts and would fail to comply with the relevant polices of the development plan outlined above.

6.9 Climate Change and the Environment

6.9.1 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): DM9, DM10, DM12, DM13, DM14, DM15

Flood Risk and Sustainable Drainage

6.9.2 The application site is located within Environment Agency Flood Zone 1 and is therefore at low risk of flooding from watercourses. The West London Strategic Flood Risk Assessment (SFRA) shows that a small part of the application site towards the eastern boundary of the application site is also within Surface Water

Flood Zone 3a. The application is supported by a Flood Risk and Sustainable Drainage Report prepared by Price & Myers.

- 6.9.3 In relation to Flood Risk, the submitted report concludes that the site is at low risk of flooding from all sources and that the development proposals would significantly reduce surface water run off rates from the site. The surface water drainage from the site is proposed to discharge to the TFL drainage network that serves the adjacent railway tracks via new connection to an existing manhole located within the site. Compensatory flood storage will also be provided for in respect of the small loss of flood plain. Surface water discharge will be restricted, and attenuation provided in the form of blue roofs and below ground attenuation tanks. Permeable paving, rain gardens and tree pits are also proposed. In respect of foul drainage, it is proposed to connect to a public foul sewer located with the Access Road of Aylward primary school.
- 6.9.4 The application was referred to the Council's Drainage Team have advised that the information provided within the Flood Risk and Sustainable Drainage Report is satisfactory. The proposed drainage strategy will need to be reviewed at the detailed design stage and at the recommendation of the Council's Drainage Team, the details of surface water attenuation and disposal can be controlled by conditions. It has also been recommended that details of the foul water disposal system and permeable paving be controlled by condition. Through such controls it will be possible for the Council to ensure that separate surface water and foul water drainage systems are implemented, reducing the risk of foul water flooding and water contamination. Subject to conditions, the proposal would accord with the relevant policies in this regard.

Carbon Dioxide Emissions Reductions

- 6.9.5 The overarching target for development in the London Plan (2021) is for major developments to be net 'zero-carbon', with this preferably achieved on site. A minimum on-site reduction of at least 35 percent beyond Building Regulations is required for major development. Where it is clearly demonstrated that the zero-carbon cannot target cannot be fully achieved on-site, any shortfalls should be provided through a cash in lieu contrition to the Council to undertake carbon emissions reductions elsewhere in the borough. The policy seeks to reduce reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy of 'be lean; be clean; be green; and be seen'.
- 6.9.6 The applicant has submitted an energy statement prepared by Couch Perry Wilkes, dated 12 March 2020. The energy strategy broadly follows the energy hierarchy as required in the current and 'Intend to Publish' versions of the London Plan. The strategy however appears to aggregate the residential and non-residential elements of the development into one set of figures, noting that non-residential element of the development is very modest.
- 6.9.7 The strategy indicates that the development will achieve overall on-site carbon reductions of 50%, which is in excess of the minimum 35% required under the London Plan. Within the 50% carbon reduction, 21% will be achieved through

energy efficiency / building fabric measures (the 'Lean' stage of the energy hierarchy); this exceeds the minimum 10% required under the 'Intend to Publish' version of the London Plan. The remaining 29% will be achieved through the provision of an Air Source Heat Pump (the 'Green' stage of the energy hierarchy). The 29% savings from the ASHP are based on a conservative assumption that high temperature ASHPs will be used; subject to planning permission being granted and more detailed assessment, alternative ambient temperature pumps maybe used instead, with greater carbon savings. The remaining 161 tonnes of carbon will be offset at the current GLA rate of £2,700 per tonne (£90 per tonne / year x 30 years), equating to a contribution of circa £434,700.

- 6.9.8 It is however also noted that the applicant has indicated that with detailed design on the proposed ASHPs, the carbon savings achieved maybe much greater than the conservative figures used in the application stage energy statement; greater savings achieved on-site will impact upon the amount of carbon to be offset / the value of the carbon offset contribution. Consequently, a pre-commencement condition will need to be applied to any permission requiring the submission of a revised energy strategy that takes into account the more detailed assessment / design of the proposed ASHP system. A pre-commencement condition is considered necessary as the detailed design of the ASHP will influence the detailed design of the rest of the scheme, including potentially at foundations / lower level stages.
- 6.9.9 The applicant has asserted that they have made contact with the operators of the heat networks in Barnet or the Jubilee House / Elysian development. They have indicated that they have received responses indicating there are no local heat connection opportunities and this is accepted.
- 6.9.10 In this particular instance (having regard to the specific development, site and location) officer accept the omission of a district energy network plant room given that there is relatively low likelihood of a wider district heat network coming forward in the foreseeable future in the absence of other major development opportunities within Stanmore and the potential impact that such plant room provision would have on the footprint and bulk of the development (with potential for further impact on biodiversity and built conservation etc).
- 6.9.11 The applicant has identified the potential for solar PV in the roofs but not proposed any nor indicated why none are proposed. Whilst the proposal exceeds the minimum 35% reductions required on site (achieving 50%), it has not demonstrated that the proposal cannot achieve zero carbon development on-site. Further detail is required from the applicant to demonstrate that all on-site renewable energy opportunities have been fully explored, as it is considered that there should be some scope for solar PV on the roofs of the development (potentially shared with the biodiverse roof as the two are not necessarily exclusive).
- 6.9.12 The applicant's comments regarding the GLA heating hierarchy and 'lower' carbon emissions from solar PV due to new carbon factors are not relevant. The overarching policy requirement is zero carbon development, with as much of this

being achieved on-site. The applicant's own energy statement indicates solar PV is potentially suitable. The rest of the response is unevidenced assertions (i.e. shadowing caused by ASHP units, alleged incompatibility between solar PV and green biodiverse roofs – a simple Google search suggests both can be mutually supportive), impact upon the SINC due to glare, and glare impact on train drivers). More evidence is required to support the assertions as to why solar PV cannot be provided. The applicant has committed (in their comments to the GLA) to consider this further at subsequent detailed design stage and proposes a bespoke condition to address this – this condition is considered reasonable.

- 6.9.13 The Non-Domestic Energy Modelling Note does not directly respond to the issue raised re the non-residential element not achieving 15% carbon reductions through energy efficiency measures alone (as required by the London Plan). Rather it suggests that as the energy efficiency measures reflect those covered in GLA guidance applicable at the time the applications were lodged, the non-compliance should be accepted. Such an assertion is not supported. A revised energy strategy would be required through a planning condition to address this issue.
- 6.9.14 In the event that planning permission is granted a S106 agreement should be secured to include payment of the offset contribution prior to commencement of the development (based on a revised energy strategy that reflects the more detailed assessment / design of the proposed ASHP) and the verification of final carbon emissions / further offset contribution secured post-completion if actual / final on-site emissions exceed that assumed in the original offset contribution calculation. The agreement should also reflect the Mayor's 'Be Seen' requirements.

Sustainability

- 6.9.15 With regards to overheating and cooling, an Outline Modelling Overheating Analysis undertaken by Couch Perry Wilkes has been submitted with the application. As part of the proposed development, in order to reduce overheating and reliance on active cooling systems, several detailed passive design measures have been considered. This includes high performance fabric and facades, green areas, thermal mass specifications, energy efficient lighting and appliances, mechanical ventilation and through the layout of the proposed development, with occupied rooms being generally east or west facing.
- 6.9.16 The results of the Overheating Analysis demonstrate that the majority of the proposed scheme would comply with the relevant criteria using DSY1 weather data. However, it is noted that some of the townhouses and flats would fail and also during more extreme weather scenarios, the temperatures experienced within some flats do not demonstrate compliance. It is therefore considered that further passive measures should be considered in accordance with the relevant policies, to avoid the risk of overheating now and in the future climate. To ensure the highest possible levels of comfort to future residential occupiers without the need for mechanical cooling systems (i.e. air conditioning), it is considered that an assessment of the potential for overheating to all flats within the development should be carried out and that detailed measures to sustainably mitigate

conditions within those particular flats where overheating would occur should be required, as a condition of any planning permission.

- 6.9.17 The proposed waste and recycling arrangements arising from the proposed development are dealt with in a separate section of this report. It is considered that the design and layout of the proposal would ensure that future occupiers of the development contribute to the Borough's good record in managing down the amount of waste sent to landfill and improving rates of recycling.
- 6.9.18 The submitted Sustainability Statement by CBRE details that the construction phase sustainability will be managed through a robust Construction Environmental Management Plan, which has been provided with the application. This would allow for the efficient handling of construction, excavation and demolition waste from the site.
- 6.9.19 In summary subject to securing appropriate planning conditions and obligations through section 106 agreement in relation to the above matters, it is considered energy matters have been adequately addressed and would comply with the relevant polices outlined above.

Air Quality

- 6.9.20 The whole of the borough has been designated as an Air Quality Management Area (AQMA), due to exceedances of the annual mean objective levels for nitrogen oxide (NO₂) and particulates (PM₁₀). An Air Quality Assessment (AQA) by ACCON UK has been submitted with the application.
- 6.9.21 In relation to the operational impact assessment, it is noted that there will be a reduction in station car parking spaces from 462 commuter car parking spaces to 300 spaces and the proposed development would be car free. The AQA details that the proposed development will not have an impact on local traffic flows and air quality because any traffic generated to and from the development will be offset by the overall reduction in station car parking movements. The AQA modelling also predicts that there will be no exceedances of the nitrogen dioxide or particulate matter objectives at the sensitive development receptors on the site, and therefore it is not deemed necessary to include any mitigation measures for the proposed development.
- 6.9.22 Therefore, in terms of the site and its immediate surroundings, the proposal would not increase exposure to poor air quality and measures to address localised or on-site air quality at operation phase are not necessary. With regards to the air quality implications of the development during the construction phase, it is considered that the submission for an Air Quality and Dust Management Plan be in place during construction, which can be secured as a condition of planning permission.

Contaminated Land

- 6.9.23 A Ground Investigation Report produced by Geotechnical & Environmental Associates Limited has been submitted with the application. In relation to Soil Contamination, samples of shallow soil were tested for a range of contaminants. Asbestos fibres were identified in addition to lead and PAH contamination. The report recommends further sampling and testing to determine the extent of the contamination encountered, particularly in areas of proposed landscaping.
- 6.9.24 In order to address the issues, further site investigations, a written method statement providing details of the remediation scheme and a watching brief strategy during groundworks for unexpected contamination could be secured by condition if planning permission is granted. Subject to conditions, the proposal would be acceptable in this regard.

7.0 CONCLUSION, PLANNING BALANCE AND REASONS FOR REFUSAL

- 7.1 The statutory position is that planning applications have to be determined in accordance with the development plan unless material considerations indicate otherwise. The relevant policies have been set out within the report above.
- 7.2 The proposed development would make efficient use of brownfield land in a sustainable location and would bring forward housing and retain an appropriate quantum of commuter parking (subject to mitigation measures being secured) in conformity with the site's allocation in the Local Plan. It is considered that the proposed mix of homes/types would respond to the location of the site and the character of its surroundings whilst optimising the housing output of the allocated site within Stanmore. The proposal would add to the supply of contemporary new build homes in the area, all of which would achieve accessible and adaptable standards and 10% of which would also achieve the enhanced requirements needed to be classified as Wheelchair-standard homes. The proposal would therefore accord with the spatial strategy for growth as set out in the development plan. This carries significant weight.
- 7.3 Officers acknowledge that a large number of residents have raised an objection to the scale of the development, noting that it would be out of keeping with the suburban character of the locality. Furthermore, responses to the public consultation have also taken issue with the design, architectural treatment, siting and proximity of the building to neighbouring properties and heritage assets. Officers acknowledge that the proposal would create a change in impacts to the townscape. However, as set out above, it is considered that the proposal would introduce high quality architecture, materials and public realm to the site. The proposal has undergone robust design scrutiny and various experts in the design field, have concluded that the scale and height would not cause detriment to the urban context of the area. However, given the shortcoming of the design in response to the context of the Kerry Avenue Conservation Area, locally listed station and impacts on sunlight/daylight to neighbouring properties, the quality of the design would not carry significant weight.

- 7.4 It is considered that that the proposed Landscape Strategy is appropriate to the proposed development and the constraints of the subject site. The proposal would provide a well-defined and enhanced pedestrian route along the new internal street and would include street trees, play trails and communal gardens which would positively enhance the streetscape and public realm and contribute towards the aspirations of the Mayor's Healthy Streets initiative. The new proposed public realm and landscape improvement is only afforded limited weight however, given the limited scope of public realm proposed in relation to the scale of the development and similarly although the landscaping would make a positive contribution is a policy requirement. Additionally, the landscaping within the site is also diminished by the high density nature and constraints of the site and also responds less well to some of the boundary/edge conditions of the site.
- 7.5 The proposed development would represent a distinctive new addition to the area. It would, by reason of its height, be visible to occupiers of premises over a wide area. The development is mostly considered to have an acceptable visual and privacy impact in relation to the closest neighbouring occupiers, by reason of the layout of buildings, orientation and distances proposed between buildings. However, the relationship with the closest properties in Westbere Drive is considered to be unacceptable in respect of building C and D due to the distances afforded and the direct facing orientation which would give rise to an unacceptably dominant and overbearing impact for these neighbours.
- 7.6 A number of adjoining properties would see transgressions in the level of daylight and sunlight beyond the BRE guidelines. Officers acknowledge that some rooms would be particularly impacted and would see material changes in the level of daylight and sunlight currently experienced. However, where the fairly small number of transgression do occur they are largely as a result of the existing empty site conditions or design of the property and are not considered to be so significant as to be unreasonable, taking account of the sites allocation for housing which is next to a major transport node. As affirmed by the Council's Independent Consultant, most of the retained values to rooms are still very good. The limited losses to sunlight and daylight are not deemed to be so significant as to warrant a refusal of the application in officers' opinion.
- 7.7 Nevertheless, it must be acknowledged that the proposal would result in a reduction in the levels of daylight and sunlight to some of the adjacent properties beyond BRE guidelines. Furthermore, a limited number of proposed single-aspect units facing the railway may be exposed to unsatisfactory levels of noise. These factors weigh against the proposal.
- 7.8 In terms of highways impact, the proposed development is expected to result in a reduction in car trips and an increase in trips by other modes. However, the potential for overspill parking from the residential element is still considered very likely as is the potential for parking demand associated with Wembley events. In order to address these concerns, more would need to be done to make walking and cycling a priority between the site and Stanmore town centre. Additional financial contributions could be secured to provide additional mitigation and combined with the proposed cycle hub, travel planning measures and alterations

to the surrounding CPZ's, would make the car free proposal and reduction of public car parking acceptable in Highways terms. All of the measures proposed are required to mitigate the impacts of the development and therefore do not carry any weight against other areas of identified harm.

- 7.9 The development is considered to be acceptable in terms of environmental considerations including energy, sustainability, air quality and contamination, subject to appropriate planning conditions and obligations as set out in the report. Whilst positive, these contributions are policy requirements and therefore are given limited weight.
- 7.10 The proposal would offer 277 units, all of which would be offered as affordable housing. 40% of the units would deliver a policy compliant tenure split which is positive. However, the proposal clearly offers an affordable housing offer that is weighted heavily to a tenure that there is not a substantial need for, being Shared Ownership. By reason of this, it results in a much lower quantum of London Affordable Rent, which there is an evidenced need for, and which offers much more in terms of alleviating homelessness within Harrow and wider London. Notwithstanding the imbalance in tenure, it is also noted that a significant number of the Shared Ownership units (2bed and above), would not be affordable to Harrow residents, when compared to the Harrow average household incomes. The additional rental discount on the 3 bed Shared Ownership Units would offer limited benefits overall to mitigate the overall quantum of units in this tenure as a total of only 7 units is proposed. By reason of the above, the weight that can be afforded to the 100% affordable housing offer in the broader planning balance is limited by the fact that the 'additional' affordable housing offer above that required by Harrow's Local Plan is of a tenure for which there is a lower identified need for.
- 7.11 Officers accept that large sites such as this should not be ruled out from defining their own setting and accommodate higher densities' than the surrounding area. Nevertheless, this needs to be done in a sensitive manner in terms of providing an appropriate transition of scale and massing and appropriate design in relation to the immediate surrounding context. It is considered that the proposal fails to have sufficient regard to its surrounding context, in respect of the lower scale two storey residential properties to the west, specifically in relation to blocks C and D, as well as the Kerry Avenue Conservation Area and Locally Listed Station. It is considered the proposed blocks would give rise to an overly dominant and overbearing scale and massing in relation to the two storey residential properties in Westbere Drive.
- 7.12 The combination of the height, design and siting of Building A would cause significant harm to the setting of the Kerry Avenue Conservation Area for which clear and convincing justification has not been provided contrary to the NPPF requirements. The harm would be caused to the open character and setting of the conservation area which is an integral part of its special character and appearance of the area as an early domestic group of Modernist Metroland built on the Garden Suburb principle and thus intended to be quite separate and semi-rural in character with open views out all around, compared to more built up

areas. Similarly, its dominance would undermine the landmark quality of the station.

- 7.13 With regards to biodiversity impact, in order for the scheme to be acceptable there would need to be an equivalent or greater area of land provided that, within a set time frame would achieve of SINC quality and which would provide like for like or better replacement of the area of woodland habitat that will be lost. Officers consider there are opportunities to address this within the immediate vicinity of the development site or potentially elsewhere along the green corridor but the applicant has elected not to pursue these opportunities.
- 7.14 The applicant is seeking instead to rely on mitigation and enhancement within the development redline, basing their proposals mainly on a biodiversity net gain approach which is considered to be flawed in several ways and is not considered to be sufficient to address the harm. It is suggested by the applicant that the benefits of the scheme, including the overall housing delivery and the need to make efficient use of a brownfield site would outweigh the harm but as set out in policy G5 the benefits of the scheme does not negate the need to comply with the policies requirements of the biodiversity mitigation hierarchy. The proposal is therefore considered to be unacceptable in relation to biodiversity impacts.
- 7.15 Moderate weight is afforded to economic benefits that would arise from the provision of employment opportunities during the construction phase and the spending power from 277 new households within the local area. Moreover over, the provision of retail space within block A will be a positive addition for the public realm activation as well as for future occupiers. Nevertheless, the retail space is small and will not have a significant economic impact on the wider area and is therefore given limited weight. It is acknowledged that the step free access to the Stanmore Underground Station will make a very positive contribution to the area but as this is a local plan requirement, in officers' opinion this only carries moderate weight in the decision making process.
- 7.16 When weighing the outlined public benefits of the scheme (including delivery of 277 affordable housing units, step free access to Stanmore Station, new landscape public realm, biodiversity management plan delivery of a cycle hub and high quality design) against the 'less than substantial harm' to the settings of the Kerry Avenue Conservation Area and Locally Listed Station, officers consider that the benefits would not outweigh the harm, contrary to paragraph 193 and 196 of the NPPF and Section 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 7.17 It should also be noted that the Council will receive no CIL from the development's housing which is clearly is a negative against the 100% Affordable Housing offer, where most of the Affordable Housing offer is in a tenure that doesn't reflect the boroughs priorities and is not particularly affordable, but still has an impact on social infrastructure such as schools / health. In officer's opinion this further undermines the planning balance. In the absence of CIL receipts the Local Planning Authority can't seek to mitigate the impact of the development on health / education as those are covered by CIL and it's the

cumulative impact of the developments on infrastructure (normally funded by CIL) rather than a site / proposal specific impact (covered by S106).

- 7.18 For all these reasons, the material considerations and benefits in favour of the proposal would not outweigh the identified harm discussed above. In accordance with the NPPF, including its presumption in favour of sustainable development, officers recommend that the planning application should be refused.

CHECKED

Interim Chief Planning Officer	Beverley Kuchar	15/07/2021
Corporate Director	Mark Billington	15/07/2021

Informatives

1. Planning Policies

The following policies are relevant to this decision:

The National Planning Policy Framework (2019)

The London Plan (2021): GG2, GG4, GG6, D1, D2, D3, D4, D5, D6, D7, D8, D9, D10,, D11, D12, D13, D14, H1, H4, H5, H6, H10, HC1, G5, G6, G7, G8, SI1, SI2, SI3, SI4, SI5, SI7 SI12, SI13, T1, T2, T3, T4, T5, T6, T6.1, T7, DF1

Harrow Core Strategy (2012): CS1A, CS1B, CS1D, CS1E, CS1H, CS1I, CS1J, CS1K, CS1R, CS1U, CS1W, CS1X, CS1Z, CS7

Development Management Policies DPD (2013): DM1, DM2, DM7, DM9, DM10, DM12, DM13, DM14, DM15, DM20, DM21, DM22, DM23 DM24, DM27, DM28, DM42, DM43, DM44, DM45, DM50

Supplementary Planning Document: Residential Design Guide (2010)

Site Allocations Development Plan Document (2013)

Planning Obligations and Affordable Housing Supplementary Planning Document (2013)

Kerry Avenue Conservation Area Supplementary Planning Document (2013)

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

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

Historic England Good Practice Advice in Planning Note 3: The setting of heritage assets

2. Mayoral Community Infrastructure Levy (provisional)

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

The Provisional Mayoral CIL liability for the application, based on the Mayoral CIL levy rate for Harrow of £60/sqm is £419,100. This amount excludes indexation which is 323/323. The floorspace subject to CIL may also change as a result of

more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).

You are advised to visit the planningportal website where you can download the appropriate document templates. Please complete and return the Assumption of Liability Form 1 and CIL Additional Information Form 0.
https://ecab.planningportal.co.uk/uploads/1app/forms/form_1_assumption_of_liability.pdf https://ecab.planningportal.co.uk/uploads/1app/forms/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

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

3. Harrow CIL

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 £100/sqm is £33,309

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/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

The above forms should be emailed to HarrowCIL@Harrow.gov.uk

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

4. Pre-application engagement

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

Drawings and Document List:

- Planning Application Form and Certificate B (CBRE), April 2020
- Additional Residential Application Form (CBRE), April 2020
- Community Infrastructure Levy (CIL) Additional Information Form (CBRE), April 2020
- Planning Statement (CBRE), March 2020, including SINC Mitigation Strategy (Townshend Landscape Architects), March 2020)
- Site Location Plan (Karakusevic Carson Architects, March 2020)
- Design and Access Statement (Karakusevic Carson Architects, March 2020)
- Landscape Plan (Townshend Landscape Architects, March 2020)
- Landscape Design and Access Statement (Townshend Landscape Architects, March 2020), document includes: - Lighting Design Strategy (AECOM, March 2020)
- Transport Assessment (including servicing and refuse) (WSP, March 2020) document includes the Parking Design and Management Plan (WSP, March 2020)
- Framework Travel Plan (WSP, March 2020);
- Noise and Vibration Assessment (Accon, March 2020)
- Statement of Community Involvement (Lowick, March 2020)
- Archaeology Statement (MOLA, March 2020)
- Heritage Statement (MOLA, March 2020)
- Energy Assessment (couchperrywilkes, March 2020)
- TM59 Overheating Assessment (couchperrywilkes, March 2020)
- Sustainability Statement (CBRE, March 2020)
- Air Quality Assessment (Accon), March 2020
- Daylight and Sunlight Assessment, impact on Neighbouring Properties (GIA, March 2020)
- Internal Daylight and Sunlight Assessment (GIA, March 2020);

- Solar Glare Report (GIA, March 2020)
- Flood Risk Assessment and Sustainable drainage (SuDS) design strategy (P&M, March 2020)
- Ecological Impact Assessment (Middlemarch, March 2020)
- Dusk Emergence and Dawn Re-Entry Bat Surveys (Middlemarch, March 2020)
- Pedestrian Level Wind Microclimate Assessment (RWDI, March 2020)
- Arboricultural Impact Assessment (Middlemarch, March 2020)
- Construction Environmental Management Plan (Midgard, March 2020)
- Ground Investigation Report (Geotechnical & Environmental Associates Limited, March 2020)
- Townscape and Visual Appraisal (Landscape Visual, March 2020)
- Inclusive Access Statement (Buro Happold, March 2020)
- Fire Strategy (BB7, March 2020)
- Whole Carbon Lifecycle Report (CBRE, May 2020)
- Transport Addendum Note (WSP, November 2020)

Drawing reference	Revision
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APPENDIX 2: SITE PLAN

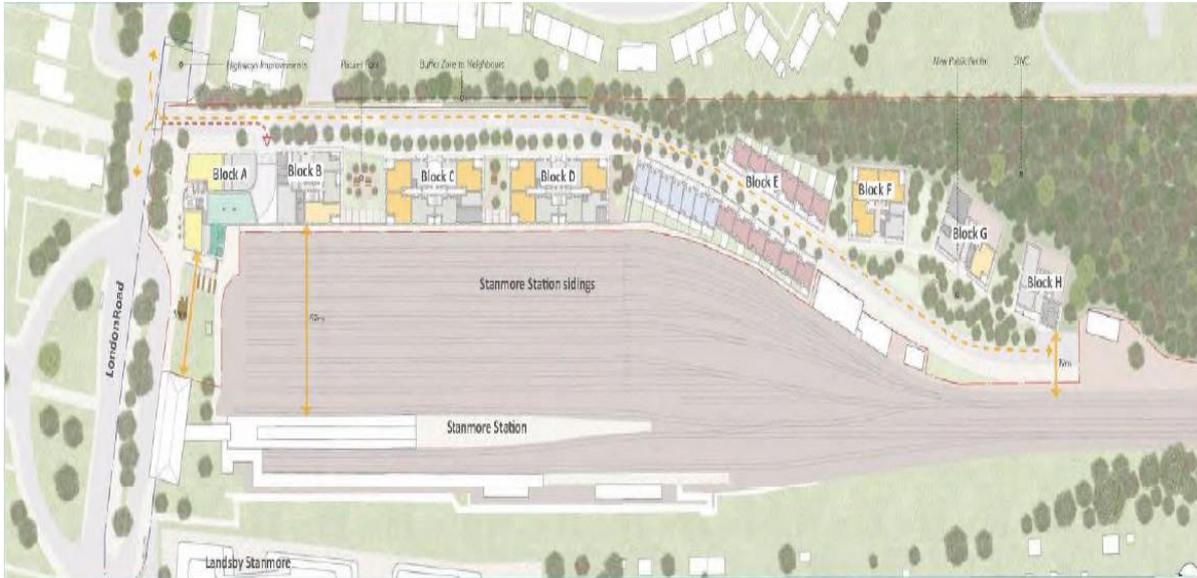


Figure 1.1: Proposed Site Plan (Wrenkusa/ur/Carson Architects)

APPENDIX 3: PHOTOGRAPHS, PLANS AND ELEVATIONS



1. Stanmore Station Forecourt - including view of the Landsby development.



2. Stanmore Station Car Park - including view of SINC in the background.



3. Stanmore Station Car Park - including view of station building.



6. Conans Park - view to Stanmore Station from Howberry Road entrance over-bridge.



7. Kerry Avenue CA - axial arrangement to Stanmore Station.



8. Kerry Avenue CA - axial arrangement to CA looking north from London Road.



11. Marecombe Gardens - existing residential street.



12. Snaresbrook Avenue - view to Site from 300 m east of Stanmore Station.



13. Merriam Avenue - Metroland housing.



4. London Road - view to Site from 180 m east of Stanmore Station.



5. London Road - view to Site from 150 m east of Stanmore Station.



9. Kerry Court - view of houses adjacent to London Road and the Kerry Avenue CA.



10. Kerry Avenue CA - view of houses on Valencia Road.



14. Merion Avenue - Landsby Stanmore development under construction (south).



15. Merion Avenue - Landsby Stanmore development under construction (north).

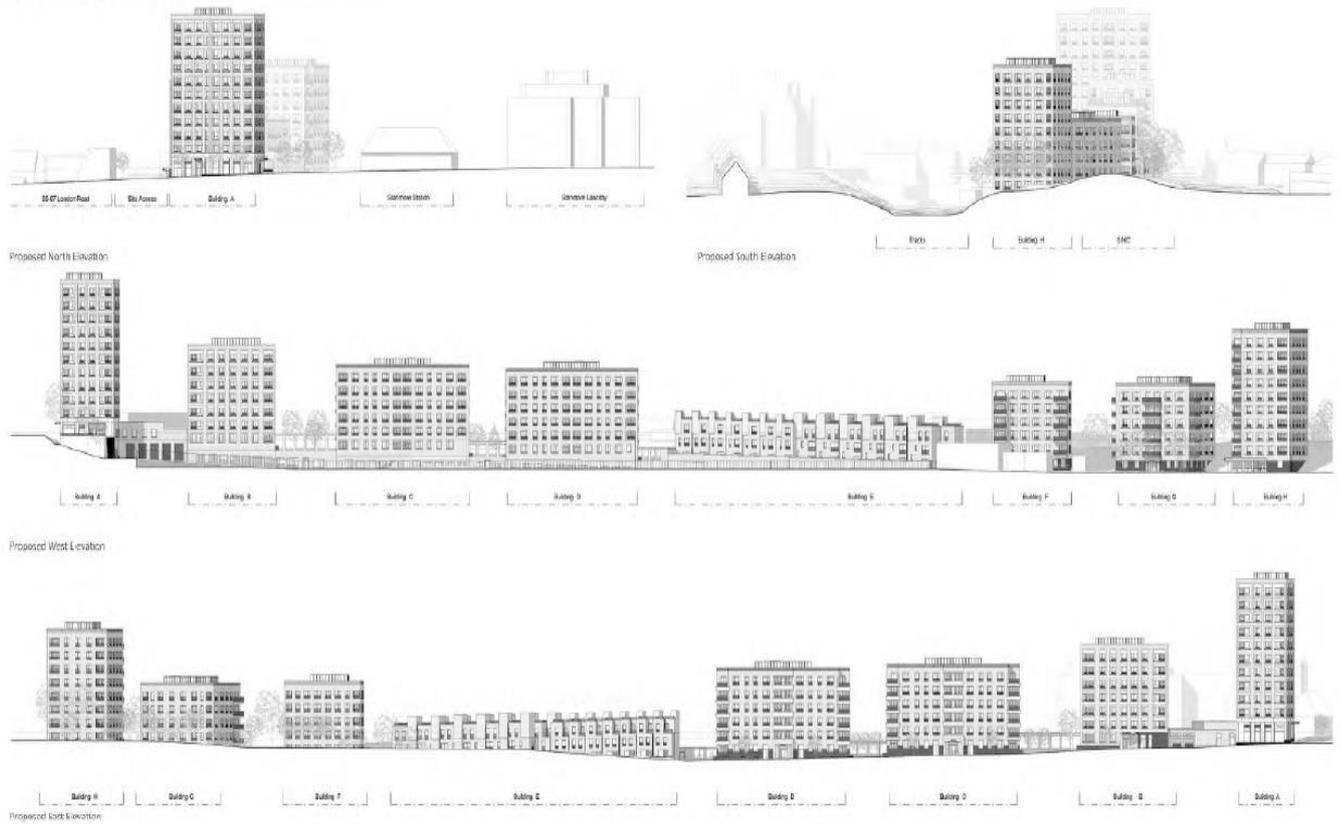


Above: Proposed Layout – Buildings A, B, C and D

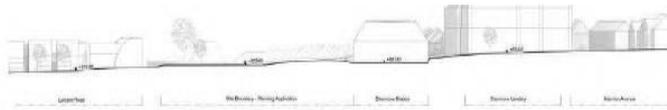


Above: Proposed Layout, Townhouses, Blocks F, G and H

Figure 1.2: Existing and Proposed Elevations (Narokusevic Carson Architects)



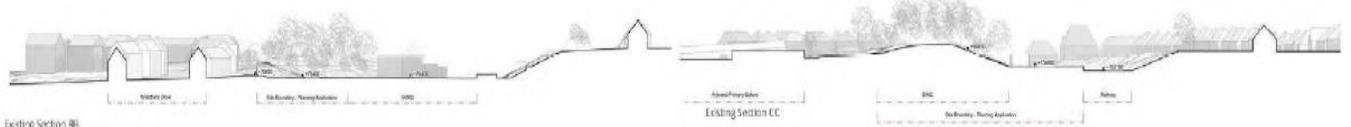
Above: Proposed Elevations



Existing Section AA



Proposed Section AA



Existing Section BB

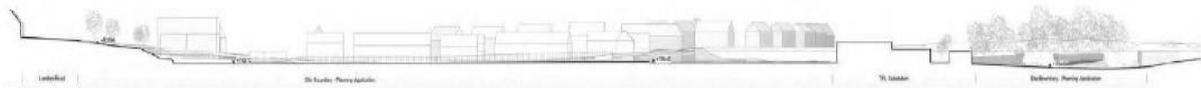
Existing Section CC



Proposed Section BB



Proposed Section CC



Existing Section CD



Proposed Section DD

Above: Proposed Sections



Proposed West/East Elevation Study



Above: Proposed Facades/Materials



Above: Building A and Relationship with Stanmore Station and the Landsby Development



Above: Building A in views from the Kerry Avenue Conservation Area



Above: Proposed Street Views of Buildings C, D, townhouses, and F, G and H

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