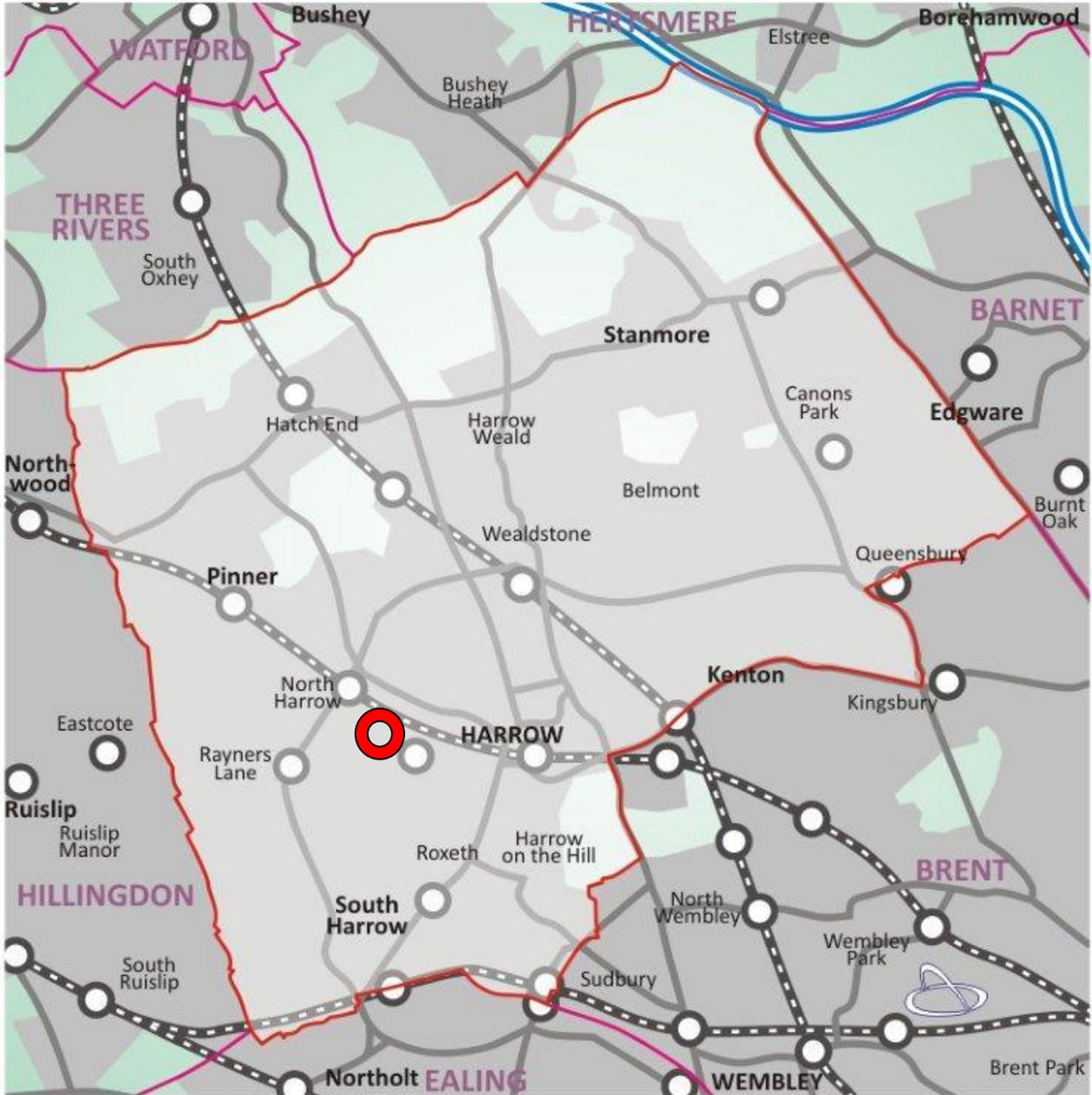


 = application site



<b>265 The Ridgeway</b>	<b>P/1492/20</b>
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# LONDON BOROUGH OF HARROW

## PLANNING COMMITTEE

**28<sup>th</sup> JULY 2021**

**APPLICATION NUMBER:** P/4192/20  
**VALIDATE DATE:** 13/05/2020  
**LOCATION:** 265 THE RIDGEWAY, HARROW, LONDON  
**WARD:** WEST HARROW  
**POSTCODE:** HA2 7DA  
**APPLICANT:** C/O AGENT  
**AGENT:** DANIEL WATNEY  
**CASE OFFICER:** SELINA HOTWANI  
**EXPIRY DATE:** 20/05/2021

### PROPOSAL

*Redevelopment of the site to provide a mixed-use scheme comprising buildings ranging from 3-7 storeys for the provision of residential units (C3); D1 floorspace and associated open space, landscaping, access, car parking, refuse stores and cycle parking and other associated works.*

The Planning Committee is asked to:

### RECOMMENDATION

The Planning Committee is asked to:

- 1) Agree the reasons for refusal as set out in this report, and
  - 2) Refuse planning permission.
- 
1. Notwithstanding the viability appraisal toolkit submitted with this application and the applicant's 'without prejudice' offer of affordable housing on this site, the proposal fails to demonstrate that the maximum reasonable level of affordable housing can be achieved on this site as required by policy H5 of The London Plan (2021) and core policy CS1 (J) of the Harrow Core strategy (2012) and the proposal would fail to deliver an appropriate tenure mix that would meet the Borough's housing priority need, contrary to core policy CS1 (I) of the Harrow Core Strategy and the guidance contained in the adopted Supplementary Planning Document: Planning Obligations (2013). The proposed development therefore fails to address strategic housing objectives including the provision of mixed, balanced and sustainable communities, contrary to the National Planning Policy Framework (2019), policies H4, H5 and H6 of the London Plan (2021) and core policies CS1(I) and CS1(J) of The Harrow Core Strategy (2012).

2. The proposed development, in the absence of sufficient information within the provided Ecological Impact Assessment to quantify the ongoing impacts on the adjacent Site of Importance for Nature Conservation (SINC) or provision of opportunities for local biodiversity mitigation or enhancement within the vicinity of the site, thereby fails to demonstrate that biodiversity value of the surrounding area would not be harmed, protected or enhanced, contrary to the National Planning Policy Framework (2019), policy G6 C and D of the London Plan (2021), policy CS 1 E of the Harrow Core Strategy (2012) and policies DM20 and DM21 of the Harrow Development Management Policies Local Plan (2013).
3. The proposal fails to provide sufficient information to determine the cumulative impact of the proposed siting of the buildings within close proximity of the Root Protection Area (RPA) incursions and long-term post-development physical, environmental and social pressure on existing trees adjacent to the development site, namely within the Site of Importance for Nature Conservation (SINC) and along the south-eastern boundary / embankment; as well as the development impact on the availability of light to ensure their long-term survival due to their close proximity to the proposed development and therefore the proposal would fail to accord with National Planning Policy Framework (2019), policy G7 of The London Plan (2021) and policy DM22 of the Development Management Policies Local Plan (2013).
4. The submitted Daylight & Sunlight Report, in the absence of accurately assessing the existing site constraints pertaining to the surrounding Site of Importance of Nature Conservation (SINC), trees and site levels, fails to provide sufficient information to assess whether the proposal would result in acceptable quality of accommodation for future residents with regard to natural light, daylight and overshadowing particularly for Blocks A, B, C, D and E. Furthermore, the close proximity and elevated siting of the Site of Importance for Nature Conservation (SINC) adjacent to Block A, would result in poor outlook to the rear-facing habitable rooms within units A00-A06 of this block, to the detriment of the amenities of the future occupiers of this block. The proposed development is therefore contrary to the high quality design aspirations of The National Planning Policy Framework (2019), policy D3(7) and D6(D) of the London Plan (2021), Core Policy CS1 of the Harrow Core Strategy (2012), and policy DM1 of the Harrow Development Management Policies Local Plan (2013).

## **EXECUTIVE SUMMARY / REASON FOR THE RECOMMENDATION**

The application site known as 265 The Ridgeway is a roughly triangular-shaped 1.4 hectare site in West Harrow in the London Borough of Harrow comprising a single storey building occupied by the Harrow Gospel Hall and associated car parking. It is bounded by a Site of Importance for Nature Conservation (SINC) along The Ridgeway to the south west, West Harrow allotments to the north and the Metropolitan Line between Uxbridge and Harrow on the Hill to the south east. The surrounding context is suburban 20th century detached and semi-detached housing.

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 proposed development would also result in a re-provision of the community floorspace. The applicant has stated that as the religious congregation has moved out of the local

area, the hall has ceased to be used as a religious meeting hall since February 2017 and is now vacant and therefore a community use by way of a GP Surgery is proposed. It has been demonstrated that the re-provision of the community use proposed would meet policy requirements given that the intention of the new health facility would meet an unmet local demand for GP surgeries, the proposed highway measures in place to promote sustainable travel would ensure it would be located in a sustainable location and it is considered that there would be no adverse impact on residential amenity or highway safety as a result of the facility.

The application was submitted (April 2020) with the intention of providing a policy compliant affordable housing offer at 40%. This offer was retracted in March 2020 and the applicants sought not to provide any affordable housing. In June 2020 a revised 'without prejudice' offer was presented to the LPA. The proposal now seeks to deliver 178 units of housing, 34 of which would be affordable-tenure (99 by habitable room) equating to 20% affordable housing provision by habitable room.

An independent review of the affordable housing offer has concluded that the proposed offer does not provide the maximum reasonable contribution either with or without the assistance of grant funding from the GLA. The proposal would therefore not 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. Furthermore, 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. The imbalance in tenure, towards a significant number of the Shared Ownership units (2 bed and above), would not be affordable to Harrow residents, when compared to the Harrow average household incomes. Therefore, the affordable housing is not considered to be acceptable.

The proposal has been conceived through a design-led approach that has sought to optimise development on this brownfield site. Officers recognise the proposal would introduce a development of contrasting scale and height that would contribute to a change in townscape character. It is however considered that 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. It is also considered that the proposal would have sufficient regard to its surrounding context, in respect of the stepped design which would be lower in scale to the north to appear comparable to the two storey residential properties on that side and confines the larger mass towards the south and south west which is separated by the Railway line and largely screened by the higher level SINC embankment.

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 the 'car-lite' approach for the residential component and highway works can be accepted, provided suitable mitigation measures and wider highway improvements are introduced. A package of mitigation measures has been provided to contribute to the modal shift and sustainable travel alternatives. A key part of this is a pedestrian and cycle path running from The Ridgeway, through the site directly to West Harrow Station. 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 limited car parking availability 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.

Notwithstanding the above and in addition to the lack of affordable housing provision, the LPA do not consider the application to be acceptable with regards to a number of other issues, namely in relation to the adjacent SINC. The proposal would result in direct and indirect impacts to the designated SINC and due regard to the biodiversity mitigation hierarchy has not been sufficiently given. 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. Furthermore, the proposal fails to provide sufficient information to determine the cumulative impact of the proposed siting of the buildings within close proximity of the Root Protection Area (RPA) incursions and long-term post-development physical, environmental and social pressure on existing trees adjacent to the development site, namely within the Site of Importance for Nature Conservation (SINC) and along the south-eastern boundary / embankment; as well as the development impact on the availability of light to ensure their long-term survival due to their close proximity to the proposed development, particularly as these also provide important visual screening from the development.

The Daylight & Sunlight Report, fails to accurately assess the existing site constraints pertaining to the surrounding Site of Importance of Nature Conservation (SINC), trees and site levels and therefore does not assess whether the proposal would result in acceptable quality of accommodation for future residents with regard to natural light, daylight and overshadowing particularly for Blocks A, B, C, D and E. Furthermore, the close proximity and elevated siting of the Site of Importance for Nature Conservation (SINC) adjacent to Block A, would result in poor outlook to the rear-facing habitable rooms within units A00-A06 of this block, to the detriment of the amenities of the future occupiers of this block, contrary to Policies D3(7) and D6(D)

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 level of public interest in this

Statutory Return Type:	All other Largescale Major Development
Council Interest:	None
Net Floorspace:	12,411 sqm (residential) and 900 sqm (non-residential)
GLA Community Infrastructure Levy (CIL) Contribution (provisional):	£774,660 (with indexation)
Local CIL requirement:	£1,965902.40 (with indexation)

## **HUMAN RIGHTS ACT**

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

## **EQUALITIES**

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

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

## **S17 Crime & Disorder Act**

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

## **1.0 SITE DESCRIPTION**

- 1.1 The subject site is roughly triangular in shape and comprises 1.4 hectares, situated in West Harrow. The site currently comprises predominantly hard surface and car parking (approximately 250 spaces) and occupied by a single storey building located on the south western corner, formerly used as a Religious Community Hall (D1 use). The boundary fronting The Ridgeway drops down in gradient towards the hall owing to the contours of the highway which bridges the Metropolitan line close to the site.
- 1.2 The site is bound by a Site of Importance for Nature Conservation (SINC) along The Ridgeway to the south west (south side of the main vehicle entrance) and the Ridgeway Playing fields to the west as well as West Harrow Allotments to the north (part of which is Designated Open Space). To the east there is an area of vegetation which includes a bee apiary and the Harrow and Leaf premises (serving the WH Allotments). The south-eastern edge is characterised by the Metropolitan Line between Uxbridge and Harrow on the Hill. Beyond this is the West Harrow Recreation Ground. The surrounding area is suburban in nature comprising 20<sup>th</sup> Century detached and semi-detached housing.
- 1.3 The existing building is not statutory listed and the site does not fall within a Conservation Area. The nearest town centre is Rayners Lane District Town Centre, which is approximately 1km walking distance to the east of the site. The site has a Public Transport Accessibility Level (PTAL) of 1b but is approximately 500m away from West Harrow Underground Station. The main vehicle and pedestrian access into the site are via a single entrance from The Ridgeway. Existing access to the station from The Ridgeway is via the Ridgeway Playing Fields or West Harrow Allotments (approximately 13 minutes walk). The nearest bus stops are located on Elm Drive and Imperial Drive approximately 350 – 600m north of the site respectively.
- 1.4 There is a water culvert which runs through the site diagonally from the western corner to the eastern corner. Parts of the north western areas of the site are located within Flood Zones 3a and b from Surface Water.

## **2.0 PROPOSAL**

- 2.1 The proposed development seeks full planning permission for the demolition of existing building and redevelopment of the site to provide a mixed-use scheme comprising D1 floor space alongside residential accommodation (178 units), in buildings ranging from 3-7 storeys, with associated open, landscaping, access, car parking, cycle parking and other associated works.
- 2.2 The works also include creating a direct pedestrian and cycle path from The Ridgeway through the site which links to an existing path outside the site to West Harrow Station. This would facilitate the 'car lite' proposals which provides for 72 car parking spaces (inclusive of 5 disabled parking spaces). Provision for cycle parking has been made comprising 356 spaces.

- 2.3 The proposal comprises of 9 blocks (A-J) and Mew Type Houses with building heights ranging from 3-7 storeys. A breakdown of the proposed development by plot is listed below.

**Block A**

- 2.4 Block A is located on the western boundary of the site adjacent to the SINC. The Block would be 4 storeys in height and comprises 7 affordable housing units (6 x 2 bed 4 person and 1 x 2 bed 3 person), the latter would be wheelchair accessible. The ground floor unit would have private amenity space whilst the remainder of the upper floor units would benefit from private balconies. Cycle storage and refuse bins have been provided at ground floor level.

- 2.5 Six surface car parking spaces are provided to the north of this block.

**Block B**

- 2.6 Block B is located south of Block A on the western boundary of the site adjacent to the SINC. The Block would be 4 storeys in height and comprises 7 units (6 x 2 bed 4 person and 1 x 2 bed 3 person), the latter would be wheelchair accessible. The ground floor unit would have private amenity space whilst the remainder of the upper floor units would benefit from private balconies. Cycle storage and refuse bins have been provided at ground floor level.

- 2.7 One disabled parking space is provided to the south of this block.

**Block C**

- 2.8 Block C is located on the southern-most point of the site. It runs parallel to the SINC on the south western boundary and to the rear runs parallel to the Railway line. This block adjoins Blocks D and E at ground floor level only. The podium gardens in between separate the three blocks. At ground floor level, under the podiums is 46 car parking spaces comprising three disabled bays.

- 2.9 Block C would be 7 storeys high. Block C comprises 34 units (18 x 1 bed 2-person, 4 x 2 bed 3-person, 8 x 2 bed 4-person, 4 x 3 bed 5 person). 4 x 1 bed units are wheelchair accessible. Each unit would comprise inset balconies. 10 x refuse bins and 56 bicycles are proposed at ground floor level. These properties would have direct access to the podium gardens. Solar panels are proposed at roof level.

**Block D**

- 2.10 Block D is located directly perpendicular to Block C and is also 7 storeys high. The rear of the block backs onto the Railway line. Block D comprises 35 units (19 x 1 bed, 2-person, 4 x 2 bed 3-person, 8 x 2 bed 4-person, 4 x 3 bed 5 person). 6 of the 1-bedroom units would be wheelchair accessible. Each block would include inset balconies. 12 refuse bins have been provided and 92 bicycles are also housed at ground floor level. The podium garden of this block would be shared with Block C.

### ***Block E***

- 2.11 Block E is oriented differently to Blocks C and D as the main flank elevation would run parallel to the Railway so that the main front of the site would address users accessing the site from West Harrow Station approach. It would be 6 storeys high. It would comprise 26 units (19 x 1 bed 2-person, 7 x 2 bed 4 person). 1 x 1 bed 2-person unit would be wheelchair accessible.

### ***Blocks F and G***

- 2.12 These blocks are centrally located within the site and are medium rise blocks at 4 storeys high. These are stacked maisonette blocks. The blocks run diagonally through the site from the main entrance to West Harrow Station defining the main pedestrian route through the site. The two blocks are separated at the centre.
- 2.13 Block F is horseshoe shaped and comprises 15 units (3 x 1 bed 2-person, 6 x 2 bed 4 person and 6 x 3 bed 5 person). At ground floor level all 6 units would have their own entrance and private amenity space, with individual refuse bins. The upper floor units would be accessed by a central core and would comprise a mix of inset and projecting balconies. The block would have a double frontage to address the streets either side. 4 x car parking spaces would serve the block. A bicycle store accommodating 18 cycles and a refuse store for 4 bins are also provided.
- 2.14 Block G is an elongated horseshoe shape with the western-most point directly opposite the main entrance as a focal point into the site. This block comprises 23 units (8 x 1 bed 2-person, 3 x 2 bed 3-person, 6 x 2 bed 4-person, 6 x 3 bed 5 person). 2 of these units would be wheelchair accessible. 8 of the units are located at ground floor level each with their own south facing private amenity space. The frontage of the block would be north facing (towards the neighbouring allotments). Each ground floor flat would have their own frontage, refuse and front garden area. A central core would provide access to the upper floor units. A series of inset and projecting balconies are provided for the upper floor units.
- 2.15 Car parking is provided to the front of Block G with one disabled bay. 6 refuse bins and 26 bicycles would also be located at ground floor level and accessed from the south.

### ***Block H***

- 2.16 Block H comprises two blocks centrally located between the Mews Houses either side on the northern boundary. The two blocks are separated by an access road which leads to the entrances of both blocks, refuse and cycle stores. The gap also provides as a view through to the allotments. Block H is 3 storeys in height and comprise 12 units (6 x 1 bed 2 person and 2 x 2 bed 3 person and 4 x 2 bed 4 person). 4 of the units would be wheelchair accessible.

### ***Block J***

- 2.17 Block J is located at the north western point of the site, closest to the main entrance. The ground and first floor levels would comprise 900 sqm of D1 floorspace serving a new health facility. The upper levels would be residential units

comprising 10 intermediate housing units (2 x 1 bed 2-person, 8 x 2-bedroom 4 person). Four disabled parking bays are dedicated for the D1 facility with 2 additional facilities which have capacity to become blue badge spaces if required.

- 2.18 A separate ground floor waste facility is provided for the D1 use and another for the residential use. Cycle parking has also been provided for both uses in separate areas.

### ***Houses A and B***

- 2.19 Houses A (of which there are 4) are 3 storeys in height, each with their own separate car parking space within an integral garage, which also stores the refuse bins. This row of houses runs adjacent to the West Harrow Allotment site on the northern boundary of the site. All houses are 4-bedroom 6 person dwellings with private amenity space to the rear at ground floor but also recessed building lines to the rear to accommodate 2<sup>nd</sup> floor balconies and visual building breaks to accommodate balconies in between the houses at 2<sup>nd</sup> floor level.
- 2.20 Houses B would be located on the other side of Block H and would comprise 5 London Affordable Rent units (all which would be 3-bedroom 5 person). These replicate the typology of Houses A.

### ***Public Realm***

- 2.21 The proposal is designed around a central pedestrian / cycle route through the site connecting The Ridgeway to an existing footpath link to West Harrow Underground Station and also follows a similar route of the water culvert below. The route features green spaces of soft and hard landscaping and is to be kept free from vehicular traffic. It would also incorporate Sustainable Drainage (SUDs) features, village green and children's play space. Improvements are proposed to the existing path outside of the site (covered by way of legal agreement).
- 2.22 The site would comprise two key access points either side of the proposed path described above. The primary access would be via the existing entrance from The Ridgeway (vehicles, pedestrians and cyclists) and the second would be at the south-eastern corner via the existing path linking West Harrow Station to the site. These access points would be highlighted through a mix of hard and soft landscape to demarcate the sense of arrival.
- 2.23 Within the site, the primary vehicular route is via the Mews Street between the houses and maisonette blocks. Access to the podium parking would be via Block C. Some secondary access routes within the site are proposed for occasional movement. The majority of the site is buffered by green space or biodiversity enhancement areas (namely northern boundary).

## **3.0 RELEVANT PLANNING HISTORY**

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

<b>Ref no.</b>	<b>Status and date</b>
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Description	of decision
WEST/489/95 Outline – Football ground, terrace and stand, artificial pitch / tennis courts sports hall, club house, floodlights, access and parking	Refused 31/01/1996
<i>Reason for refusal:</i> 1. The overflow parking resulting during busy periods of usage of the development would generate conditions prejudicial to local residential amenity, highway safety and free flow of traffic; 2. The activities generated by proposal together with floodlighting would result in noise and disturbance prejudicial to the amenities of neighbouring residents. 3. The proposals result in a loss of green space which is prejudicial to the character of the area.	
WEST/654/96/OUT Outline – Detached single storey building to provide meeting hall with access and parking	Granted 11/02/1997
WEST/321/97/FUL Detached single storey building to provide meeting hall with access and parking and junior football pitch with access and parking	Granted 11/12/1997
P/1139/20 EIA Screening Opinion to determine whether an Environmental Impact Assessment is required for up to 178 residential units and 900m2 D1 facility	ES not required 24/04/2020

#### 4.0 **CONSULTATION**

- 4.1 A Site Notice was erected on 16 June 2020 expiring on 28 July 2020 (period of 42 days). The application was advertised as a major application. Press Notice was advertised in the Harrow Times on the 18 June 2020 expiring on 9 July 2020.
- 4.2 A total of 4007 notification letters were sent to nearby properties regarding this application. The public consultation period was extended to 6 weeks (42 days) from the letter dated 12<sup>th</sup> June 2020 due to constraints concerning the pandemic. The public consultation period expired on 23 July 2020.
- 4.3 A re-consultation took place on updated documents and notification letters were sent to nearby properties on 30 March 2021 expiring on 20 April 2021 (period of 21 days). A total of 4,171 notification letters were sent. An additional 164 properties were notified to account for those that commented following the first round. The covering letter from the applicant outlining the summary of changes has been included in Appendix 6.

4.4 Site Notices (5x) were erected on 16 April 2021 for a period of 28 days, expiring on 28 May 2021.

4.5 Adjoining Properties

Number of letters Sent 1 <sup>st</sup> round of consultation	4,007
Number of letters Sent 2 <sup>nd</sup> round of consultation	4,071
Number of Responses Received 1 <sup>st</sup> round of consultation	518
Number of Responses Received 2 <sup>nd</sup> round of consultation	502
Number in Support	0
Number of Objections 1 <sup>st</sup> round of consultation	518
Number of Objections 2 <sup>nd</sup> round of consultation	502
Number of other Representations (neither objecting or supporting)	0

4.6 More than 500 objections were received from consulted neighbours / properties after each round of consultations.

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

<p><b>Social-Economic</b></p> <ul style="list-style-type: none"><li>- Block of flats are a cause of social problems in Harrow;</li><li>- Flats are offered for rental;</li><li>- West Harrow is already presented with social-economic problems – full of crime and drugs;</li><li>- Will increase crime, nuisance and security issues for the allotment site</li><li>- Harrow is already over populated;</li><li>- Insufficient Social Housing Provision</li></ul> <p><b>Officer Comments:</b> <i>The applicant has engaged the Designing Out Crime Officer (DOCO) for Harrow in developing the proposed development. The DOCO has also been formally consulted on this application and the applicant has updated the drawings to reflect the concerns raised. A Secure By Design Accreditation condition should be achieved and attached by condition should the application be granted.</i></p> <p><i>The proposed pedestrian link to the existing path would increase public permeability and ensure residents and the wider public have a quicker, safer and overlooked access to public transport. More people using the route will mean more natural surveillance and conditions and obligations would be recommended to ensure the safety and ease of accessibility for its use.</i></p> <p><i>Both national and regional development plans direct new growth to previously developed land and encourage that where suitable densities should be maximised. Further justification is set out under the 'Principle of Development' section of the appraisal.</i></p> <p><i>The Social Housing provision is considered in section 6.3 of the report appraisal.</i></p>
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**Status of the site**

- The site is not a brownfield site despite the submitted reports referring to it as such. If anything, it is greenfield land, being within the green grid.
- The site is not allocated on the Brownfield Register or Harrow's Site Allocation Document.

**Officer Comment:** *The site is brownfield land on the basis that it is previously developed land. Previously developed land is defined as land which has a permanent structure and any associated fixed surface infrastructure. The application site is a brownfield parcel of land currently contains a single storey building in its south-western corner, used as a religious meeting hall until February 2017, with the remainder of the site comprising extensive levels of hardstanding utilised as car parking (approximately 250 spaces).*

*The National Planning Policy Framework puts emphasis on making as much use of previously developed or 'brownfield' land as possible. The London Plan offers support for the delivery of homes on brownfield sites through Policy with Paragraph 1.2.5 stating: "All options for using the city's land more effectively will need to be explored as London's growth continues, including the redevelopment of brownfield sites and the intensification of existing places, including in outer London. New and enhanced transport links will play an important role in allowing this to happen, unlocking homes and jobs growth in new areas and ensuring that new developments are not planned around car use" and Policy GG2; para 1.4.5 stating that "reusing large brownfield sites will remain crucial"*

**Character, scale and Mass**

- No significant changes to revised proposal.
- Skyline is ruined – how can a proposal from 3 to 7 storeys in height be even considered;
- Will block views and skyline to the surrounding properties would tower over Fernbrook Drive;
- This is a residential development not an industrial area;
- Will end up with an estate type area soon becomes a no go zone – who will occupy these high rise besides the rail tracks – with the pollution from the trains and freight trains;
- Go and see the huge eyesore block of flats in Wembley High Road built with Argos was – its ugly and made the high street dark and depressing;
- Build something in height that the community can thrive in;
- Consider blocks of no higher 6 floors;
- General slum looking development built for short term gain.
- General height, bulk, scale, massing is incongruous.
- Should not be compared to Apple Grove development as that is a different context.
- Visual impact on allotment.

**Officer Comment:** *The site is self-contained in character, bounded by infrastructure and allotments, surrounded by dense vegetation, and set at a lower level than The Ridgeway towards its southern end. Responding to comments relating to views and overbearingness of the proposed buildings, the submitted Townscape and Visual Impact Assessment explains that while the height and overall scale of the proposed development would be greater than*

*that of its surroundings, and it would represent a different form of development, the proposed development would be comparable in these respects with the existing Apple Grove scheme, and its location adjacent to an identifiable point in the townscape (the elevated crossing of The Ridgeway over the Metropolitan Line rail tracks) and on a relatively self-contained site (such as this) suggest it as an appropriate location for a development of the proposed type and scale.*

*The distribution of the massing across the site would respond sensitively to the different contexts addressed by the site and further limit its visual impact. The visibility of the proposed development from the surrounding area would be limited, but where seen it would form an attractive addition to views. It would appear as a distinct background element within most such views, and with an apparent scale that would sit comfortably alongside lower scale existing development in the local area.*

*Apple Grove is similar in site circumstances to the application site given its self-contained nature, level differences with the wider area, siting close to the railway and of a similar scale in comparison to its surroundings. It is clear that much like the proposed development the orientation of residential blocks, distribution of mass and large separation distances have ensured the scale and design is compatible within its context. Furthermore, the site is located in close proximity to Apple Grove and is therefore consistent with the changing pattern of development in Harrow, as advocated by local and national policy guidance.*

*The impact on the character and townscape has been addressed under 'Character and Appearance' and 'Impact on Protected Views' sections of the appraisal below.*

**Residential Amenity:**

- There will be an increase in noise and disturbance as a result of the proposed use

**Officer Comment:** *A Construction Management Plan could be secured by condition and could require details of noise mitigation during the construction process. The low level of car parking will reduce the risk of any vehicular noise. Given a residential use is proposed, the proposed use is not likely to generate adverse impacts at night and will not generate continuous adverse levels of noise.*

**Impact on neighbouring Allotments**

- The proposed footpath sits close to the allotments and could allow children to play on the allotment.
- The submitted reports fail to address daylight/sunlight impact for the allotment
- The scheme will result in the loss of allotment land.
- The proposed flats will overshadow the allotments, increasing the risk of flooding, delaying the drying out of flooded areas and crop growth, especially with the proposed removal of the green corridor drainage ditch bordering the allotment.

**Officer Comments:** *There will be no loss of allotment land as a result of the proposed development given that the proposed development seeks to utilise and improve the existing pathway leading to West Harrow Station. Details of this*

*will need to be worked through at legal negotiation stage, should the application be granted.*

*Currently, there is pedestrian and cycle right of way to the station via West Harrow Recreation Ground or through the West Harrow allotments. The scheme will provide for a pedestrian link to the existing footpath on land owned by London Borough of Harrow which will also benefit the wider public. Appropriate boundary treatment could be provided with the proposed path.*

*The daylight and sunlight submitted with this application provides an indication of the impacts of sunlight / daylight on allotments and considers that sufficient levels would be retained, i.e. more than 2 hours of sunlight when measured during the Spring equinox (March 21<sup>st</sup>). Overshadowing has been minimised through a reduction in massing and stepping down the height towards the allotment gardens. Given the allotments are situated to the north of the site and the built development is separated via the proposed private gardens, it is unlikely that detrimental overshadowing, daylight and sunlight issues will arise.*

*The measures in place to ensure the incorporation of SUDs as well as the impact of the removal of the ditch within the development site have been addressed in the Flood Risk Section of the report.*

#### **Removal of trees**

-The removal of any trees will eliminate a valuable visual amenity. It will also impact biodiversity and disrupt the local ecosystem.

**Officers Comment:** *The LPA does not condone the removal of the trees on the northern boundary of the site. The removal of this would be subject of Enforcement Action should the application be refused. This and other matters relating to the impact of the development on trees is assessed within Section 6.9 of the appraisal section of the report.*

#### **Ecology**

- Proposal does not respect the character of the position of the site within Harrow's Green Grid.
- Huma Pearce did not list Serotine Bat on detector 4719. Tawny owl and slow worm is found in the allotment and SINC sites and it is therefore highly possible on the Pavillion site as well.
- The allotment site has ponds on plots and so there are ponds contrary to the Ecology Assessment. There have been sightings of nets, badger mounds were blocked up and so badger sets were interfered with. HBKA have concerns for the apiary with potential overshadowing, disturbance and forage availability.
- The Ecological Report highlights reptiles were found in the eastern corner of the site and so calls for a comprehensive report.
- Proposed bat tubes won't work as they will be attached to well-lit buildings.
- The proposed development makes no contribution to the environment;
- Replacement of mature trees with a hedge is not appropriate.

**Officers Comment:** *An Ecological Impact Assessment has been submitted alongside the updated information subject of re-consultation in March 2021 was provided to respond to the matters raised by the public and by London Borough*

*of Harrow Officers. The information is considered to be insufficient, further detail is provided in Section 6.9 of the report appraisal.*

**Traffic and Highways**

- The proposal provides inadequate car parking provision and a strain on public transport. This will mean increased car parking in neighbouring residential roads. The developer needs to agree to a CPZ.
- The proposal is poorly designed in terms of cycle and foot travel. The pinch point of the proposed allotment gateway cannot be widened due to railway embankment and Vaughan School.
- There has also been considerable work carried out to the cattle bridge and increased cars on the road will put stress on the cattle bridge and stress on the embankment.
- The proposed path is not a safe, short route to West Harrow Station after dark.
- The parking surveys are not accurate
- Road and pedestrian safety at entrance to 'Cattle Bridge'
- Increased footfall on narrow pavements;
- Severing of green corridor between Harrow West Park and Allotments;
- No electric charging points proposed

**Officer Comments:** *A technical note is enclosed which responds to the comments provided by the London Borough of Harrow with regard to transport impact.*

*In response to the public comments received, the development will deliver 72 car parking spaces at a ratio of 0.4 spaces per unit. Contributions towards studies in relation to the need for parking restrictions would need to be undertaken post development and secured by way of legal agreement. This will ensure that there will not be increased parking in residential streets.*

*The site is around 500 metres in a direct line to West Harrow station, or 1 Kilometre walking distance, and the scheme will contribute to a direct pedestrian and cycling route from the site to the station. The proposed pedestrian and cycle access route from the site to West Harrow station will improve local connections and is strongly supported by the Mayor. Further details of the design of this new route have been provided and this will be secured via S106/S278 Agreement.*

*There are approximately 250 existing car parking spaces compared with the proposed 72 car parking spaces. The scheme is designed to be car-lite and so the number of vehicles associated with the residential units will not be high. The submitted Transport Assessment indicates that the proposed use will result in less vehicles trips to and from the site. Therefore it is highly unlikely that the limited vehicle activity associated with the development will put stress on the existing bridge. The scheme is proposing to provide for an extension to the existing path that currently operates very well. The number of electrical charging points would need to comply with London Plan standards and can be conditioned as such.*

*The LPA questioned the accuracy of the parking survey, and further specific review of the survey information could be interrogated as necessary should they become specifically relevant. At this stage the proposed development is not*

*seeking to be reliant on any level of off-site parking availability, and therefore whilst it is accepted that discrepancies may be present in the data the parking surveys do not have a material impact on the development proposal or any conclusions drawn within the TA. It has already been noted within the applicants response that an absence of local on-street parking controls should not be a barrier to new development, and that future residents will not have access to resident parking permits should controls be brought forward to protect existing residential parking amenity. The parking survey does not form a material consideration in relation to the proposed development and therefore it is not the data presented at this stage is adequate.*

#### **Infrastructure**

- Hospitals are unable to cope;
- Emergency service, hospital and health risks – emergency services unable to cope;
- GP practices locally are not accepting patients;
- With no provision for services such as schools, GP surgeries etc the additional burden this will create on already struggling infrastructure;
- How will existing utilities infrastructure (water/sewers/roads) be able to cope with added stress of the proposed development.

**Officer Comments:** *The proposal seeks to provide a new GP Surgery to cater for the existing over capacity of population to nearby surgeries. A Services Report was submitted with the application to confirm the utilities and servicing arrangements for the proposed development with regard to surface water drainage, foul water drainage, water supply, electrical supply, gas supply and telecommunications. The report sets out how existing and proposed utilities and servicing infrastructure will be successfully incorporated into the scheme.*

*Furthermore, should planning permission be granted for the proposed development, significant financial contributions to local infrastructure in the form of CIL payments will be provided to support local services.*

#### **Air Quality**

- The increased congestion will increase the pollution levels in the area.

**Officer Comments:** *The application is supported by an Air Quality Assessment. This has reviewed the existing air quality in the area and impacts in respect of relevant legislation, policy and guidance.*

*There are approximately 250 existing car parking spaces compared with the proposed 72 car parking spaces. The scheme is designed to be car-lite and so there is expected to be a net reduction in vehicles utilising the local road network. In addition, no on-site combustion sources are proposed. On this basis, the report concludes that the car park is not expected to have a materially adverse effect on air quality at existing receptor locations, and it is not envisaged that the scheme would have a significant adverse effect on air quality. The proposed development was also found to be air quality neutral in accordance with the MOL SPG (The Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance) and based on this, mitigation measures are not required. Therefore, it is highly unlikely that the limited vehicle activity associated with the development will increase pollution levels in the area.*

*This aspect is covered within Section 6.12 of the report appraisal.*

**Other matters**

-Not redundant as a faith premises – offers were made to the Brethren

**Officer Comments:** *The LPA have based their assessment on the proposal under the current application and are unable to take into account other offers made (unless with respect to matters relating to viability where relevant).*

-A covenant exists in 1997 which restricts development and a 'Royal Warrant' on the site dating back to 1530s for public use.

**Officer Comments:** *This is not a planning consideration and is a civil matter between interested parties.*

-Housing mix is insufficient (excess 1 beds and not enough 3bed)

**Officer Comments:** *This has been assessed within Section 6.3 of the report appraisal.*

-The Site Location Plan is inaccurate and encroaches on West Harrow Allotment land.

**Officer Comments:** *The applicants commissioned a topographical survey of the site to accurately reflect the current state of the land including the boundaries. The applicant's solicitor has stated:*

*"The residents have carried out a crude measurement of the site location plan against the red line as depicted on the title plan registered at the Land Registry. They have then concluded from that, that the application site includes land beyond the applicant's ownership. Such assessment is not accurate and not conclusive. As the Council will be aware there is often a discrepancy between the Land Registry red line plans and the actual extent of a proprietor's ownership.*

*Given the scale used on the Land Registry plans and the plotting used by the Land Registry, the Land Registry plans are not an accurate reflection of the position on the ground and it is accepted that they are not representative of boundaries. Indeed, the Land Registry website includes this caveat in relation to its plans.*

*The red line on the title plans can in fact distort the measurements in that there can be in the region of 1 meter in the red line itself. It is therefore not correct for the residents to conclude, with the plans they have presented that the site is not within the applicant's ownership."*

*The Council's legal team have reviewed the site location plan and the statement provided by the applicant solicitor and consider there to be sufficient evidence to demonstrate that the land which forms part of the red line is wholly under the ownership of the applicants.*

4.8 Statutory and Non Statutory Consultation

4.9 The following consultations have been undertaken:

**LBH Environmental Health**

No objection subject to the following conditions:

- 1) No floodlighting or other form of external lighting shall be installed unless approved in writing by the Local Planning Authority.
- 2) The development hereby permitted shall not commence until a scheme to deal with contamination has been submitted in accordance with the Supplementary Planning Guidance Document on Land Contamination and approved by the Local Planning Authority (LPA).
- 3) The development shall not begin until a scheme which specifies the provisions to be made for the control of noise emanating from the Commercial/Community use (what was previously D1 use) has been submitted to and approved in writing by the Local Planning Authority.
- 4) The development shall not begin until the recommended sound insulation scheme for the control of noise transmission from road/rail noise to residential premises outlined in the noise report (ref 297414-RSK-RP-001-(02) has been submitted to and approved in writing by the Local Planning Authority.
- 5) No air extraction system shall be used on the premises until a scheme for the control of noise and odour emanating from the site has been submitted to and approved in writing by the Local Planning Authority.
- 6) Unless otherwise agreed in writing by the Local Planning Authority, there shall be no commercial loading or unloading of vehicles, including collections, outside the hours of 0800 and 1800 Monday to Friday and outside of the hours of 0800 and 1300 on Saturdays. There shall be no commercial loading or unloading on Sundays, Public or Bank Holidays.
- 7) The premises shall not be open for customers/community outside the following hours: -  
0800 to 2300, Mondays - Fridays  
0800 to 2300 Saturdays  
1000 to 1800 Sundays, Public or Bank Holidays.
- 8) Construction Management Plan shall be submitted for each phase of development.

**Head of Traffic Management**

With regard to this link it is important to resolve the following issues if it is to become an established active travel link between the development and the station.

- There is an issue with the locked gate near the station blocking the right of way that needs to be resolved. It is unlawful to deny the public access on a right of way even though this is clearly being done for security reasons. The installation of a kissing gate could be a way to resolve this. • Currently this urban footpath is not entered on the definitive map as a formal right of way, therefore a legal process using a DMMO is required to clarify the status of

this link as a footpath.

- The use of the path by vehicles accessing the allotments via the gate, when open, is a direct conflict with pedestrians on the path and may have some safety issues. Some sort of segregation should ideally be installed to separate pedestrians and vehicles. This would require the path to be widened and footway and carriageway sections designated, this would involve acquiring land in order to achieve the necessary width. Some dialogue with corporate estates will be needed to consider this.
- If the path is to be used by cyclists as well then legal provision will need to be made for this, the path would need to become a byway in order to allow pedestrian, cyclists and vehicles. This would also need to be designated on the definitive map through the same DMMO process. It would need to be decided if cyclists should have a separate cycle track or share the carriageway with vehicles or share the footway with pedestrians, this would need to be specified. A separate cycle track would require even more width to be provided which may not be practical.

Therefore, it needs to be clarified what use this link will have, just pedestrians or both pedestrians and cyclists, and to develop a suitable scheme to improve the path to accommodate this arrangement appropriately. The link in its current form is not suitable. We assume the developer will need to propose a suitable design and specify the intended uses.

#### **LBH Drainage**

No objection subject to appropriate conditions and informatives.

With regards to the above planning application, please be advised that the applicant has submitted additional information but our standard drainage conditions still apply.

- Please forward to the applicant our attached standard drainage requirements letter and request surface water discharge to be restricted to 5 l/s/ha with revised storage calculations.
- Their Thames Water consent to discharge 5 l/s is out of date, so they need to consult Thames Water again.
- We don't prefer a higher discharge due to flooding issues in the area.

#### **Building Control – Fire Statement**

##### *First Consultation*

In reference to the Mayors Plan Policies D5 & D12 I would make the following comments:-

1. The document was drafted prior to the implementation of The Mayors Plan Policies it therefore does not follow the guidance issued by The Mayor's Office and is deficient of information in a number of instances.
2. The document provides no declaration of compliance for either Policy D5 or D12
3. The document fails to demonstrate a higher level of fire safety than the Building Regulations.
4. There is no evidence to substantiate the authors competence.

5. The document references evacuation lifts but states that firefighting lifts can be utilised as evacuation lifts. No consideration is given to simultaneous use by the fire brigade and what happens to occupants in this instance.
6. The documents states that the where no fire fighting lift is provided then no evacuation lift is required contrary to Policy D5.
7. Deviations are identified from design codes within the text of the document for which no justification has been provided.
8. No consideration appears to have been given to where occupants requiring the evacuation lift are to wait safely in the event of an incident. The effect of the lift on smoke lobbies or smoke control systems has been given no consideration.
9. No reference has been made to what design code any evacuation lift will meet.
10. No consideration appears to be given to places of assembly.
11. Commentary on structure and external facades is generic and not site specific.
12. 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.
13. 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.

*Updated document:*

No comments received.

### **LBH Energy**

In terms of energy / carbon, there is not much more to add from a local perspective to the GLA energy officer's comments, since these conclude that the energy strategy generally reflects the requirements of the London Plan and only minor additional information is required; I concur with the GLA comments / conclusions.

In terms of the additional information sought by the GLA, this includes commentary on whether from a Local Authority (LA) perspective, there are any existing / proposed heat networks in the wider area that the site could potentially connect to (comment no. 9). In this regard, the Heat Mapping work completed in early 2016 considered a network centred on Grange Farm Estate (estate regeneration project) and extending as far as Whitmore High School and Grange Primary School (about half-way between Grange Farm Estate and the subject site). This Heat Mapping study however concluded that such a network was not financially feasible and consequently the Grange Farm estate regeneration scheme is proceeding on the basis of a heat network / plant room serving just that site. The Internal Rate of Return (IRR) for the broader network was in the order of -5% over 40 years, suggesting that further extension of the network to serve the Ridgeway site is unlikely to result in the network becoming financially viable. So from a LA perspective, there are no existing or propose heat networks the Ridgeway development could connect up to. The scheme should however be designed to allow future connection to a wider network in the future, as per the GLA comments (no. 11).

Similarly, we concur that additional information on the proposed ground source heat pump (GSHP) is required (comment no. 13) as these have specific geology and site area / space requirements.

In terms of carbon offset contribution (comment no. 16), the applicant has used the current GLA rate of £1,800 per tonne, which the LPA has adopted in the absence of any locally set rate. Consequently, the approach is acceptable. Should the application be considered by Committee after the New London Plan is published in its final form, the contribution would need to be based on the revised GLA rate of £2,850 per tonne.

Given the above, any recommendation to grant should include:

- Condition securing implementation of the scheme generally in accordance with a revised energy strategy that reflects the additional information sought by the GLA; and
- S106 requiring payment of the carbon offset contribution prior to commencement and verification of carbon reductions / further contribution upon completion of the development, as well as ongoing monitoring in accordance with the GLA's 'Be seen' energy monitoring guidance.

### **LBH Highways**

#### **First Consultation Response**

The proposal to redevelop the existing Gospel Church site to a mixed use residential and D1 unit has been considered as set out above. In terms of highways impact the proposed development is shown to result in an overall reduction in two-way trips in comparison to the existing use. The intentions are ambitious, aiming to provide a car-lite development of 178 dwellings in a location where public transport access is considered to be poor to moderate. The principle of a residential development is feasible for this site as it is within an already residential area however, without improvements to walking and cycling accessibility, the car-lite intentions will be difficult to achieve. At present, Highways are unable to support the proposal as there are issues that need to be resolved in relation to the proposed link leading to West Harrow Station and despite the ATZ assessment identifying various issues with The Ridgeway and routes to key destinations, no mitigation has been proposed. With the potential for more people working from home in the future following the events of the COVID 19 pandemic, pedestrian and cycle accessibility are considered to be paramount and appropriate measures to properly enable these to become the primary mode of travel must be secured in order to make this proposal acceptable.

#### **Second Consultation Response Following Applicants Response**

We accept the policy intentions to encourage more sustainable travel and support proposals that offer low parking provision in order to achieve modal shift, however, we are also trying to be realistic about what is feasible and where. In a location where the nearest shops are about a kilometre away and involve traversing a railway bridge, we are not confident that this is a location where people will think it is convenient to not have access to a car. This

means that even if they cannot park a car on site, they will park elsewhere. We need to be confident that in an area where the majority of people are shown to have a low propensity to change their travel habits, that it is a realistic expectation that new people who are more likely to travel sustainably would actually want to live there. Is there anything locally that would attract students and graduates? The suburban moderation group has an average propensity to change which means that they may choose to travel sustainably, but equally may not. As highway authority, we have to try to ensure that proposals do not result in an adverse impact for the surrounding highway network. The GLA and TfL do not have to deal with day to day issues on the local highway network; whilst they may view this location as highly accessible it does not mean that our local knowledge is somehow less important.

The density of housing matters in highways terms in the sense that inadequate parking provision is likely to lead to overspill parking problems. Insufficient public transport options are likely to lead to people choosing to use cars. A large number of people concentrated in one area increases the likely level of impact a proposal may have.

We are not against the principle of a residential development and a car lite scheme could be acceptable if there are real opportunities to encourage sustainable travel as the main mode provided there is no significant overspill of car parking onto the surrounding highway network. Our experience so far has shown us that even when future residents are aware of the intention of low car provision developments, they still often expect to be able to park their cars regardless. The areas where restricting this activity work best are where there are parking controls in the surrounding area and very good/excellent access to public transport and amenities – usually high PTAL, town centre locations. We acknowledge the suggestion that a contribution towards investigating the need for a controlled parking zone; at present there does not seem to be a problem with parking in the local area therefore, a review would need to take place following occupation of the development which would require an initial contribution of £10,000; if this investigation showed that parking controls are required, a further contribution to fund the implementation would be required.

A pedestrian crossing facility should be provided as previously discussed and this can be captured through the Section 106 legal agreement with details to be worked through via s278.

Comments in relation to the experience of walking over the railway bridge were meant to allow for consideration of how to improve the situation, perhaps a reduction in speed limit at this point would make for a more comfortable situation and also benefit those trying to enter and exit the site.

The D1 use should be required to supply a travel plan and parking design and management plan – these would allow for further consideration of parking arrangements when it is known what will occupy this unit.

Cycle parking proposals are acceptable – plans showing the detail of the stores would be helpful. The facilities should remain in perpetuity; perhaps a condition requiring the retention of the stores for cycle parking and no other

purpose would be beneficial.

The extra information on the pedestrian footpath link is helpful. Is this something that can definitely be secured as it is a really important feature of the development proposal? This is a key improvement of access to public transport for both future residents and other people travelling from the west. Either option looks broadly acceptable however, others may have an opinion on any impact there may be on trees in option two.

Provided the above mentioned conditions/obligations can be provided along with assurance that the pedestrian footpath link will be created, Highways have no objection.

### **LBH Planning Policy**

#### *D1 Use*

Ongoing discussions between Harrow Council and the CCG/NHS indicate that financially it is unlikely that funding would be available for the fit out of any medical facility from NHS / CCG. The NHS / CCG have allocated budgeting for other strategic sites within Harrow, which result in funding for this site not being available. Whilst the applicant has provided figures that detail that there are more patients per GP than what is best practice, given the uncertainty around the actual end user, there is little confidence in that an end user can be secured to ensure that the use would be within the community which it intends to serve.

Notwithstanding the above, the applicant has demonstrated that there is a need for such a facility within the area, and the delivery of such a facility would be welcomed in that regard. The applicant has also provided revised floorplans for the medical facility, which now show detailed layout for a medical centre. Firstly, it is not clear if there has been any further dialogue between the applicant with The Ridgeway Surgery in developing this, nor any dialogue with NHS /CCG regarding meeting general layout guidelines. By reason of this, it is not clear if what is proposed would actually be fit for purpose. In the event that the layout would be fit for purpose, then this floorspace should be secured and that the applicant deliver this fit out – by reason of no further detail on how this community use is able to be brought forward in terms of funding.

#### *Residential Use*

The site constitutes a brownfield site, which is occupied by a vacant (since 2017) place of worship and its significant ancillary parking. The LPA is satisfied that the site is a brownfield site and is therefore appropriate for redevelopment. Whilst no exercise to let the site as a place of worship has been undertaken, the parishioners who occupied the site have left and did so in 2017, and the application would re-provide the 900sqm D1 Use Class on site as a Doctors Surgery. In the event that the surgery floorspace is provided and taken up, there is no objection to the scheme.

It is noted throughout the pre-application discussions and within all the supporting documentation, that the applicant proposes a 40% offer of Affordable Housing, with a 60% offer of London Affordable rent and 40% of

Shared Ownership. However, a financial viability assessment has now been submitted and the applicant has withdrawn its offer, stating that the scheme cannot viably provide an affordable housing contribution. This is a very disappointing outcome given the amount of pre-application discussion between the applicant and the LPA (Design Review Panel and Major Projects Panel), and the Mayor of London. The withdrawal of the affordable housing offer significantly reduces the planning benefit of the scheme. The viability of the scheme and therefore the affordability of the scheme is discussed later within the Officers report.

### **LBH Design**

No Objection

In most aspects, this proposal is considered highly resolved, with minimal urban design concern regarding massing, public realm and site strategy and the impact of these on the wider built and natural contexts. Concern chiefly exists regarding design elements of the podium blocks, which being the largest and most visible elements of the proposal will have the greatest impact on the surrounding context. Notably, concern exists regarding the architectural quality and external appearance of elevations, including façades rhythm and fenestration to Blocks C, D and E particularly given their visibility from West Harrow Park and additionally to blocks A and B. Equally, changes to podium amenity spaces are required.

Full detailed comments are incorporated in the appraisal below.

### **LBH Conservation Officer**

No Objection

### **LBH Tree Officer**

- T8 Oak: this is still proposed for removal to facilitate Block E. By default such trees must be retained unless there is overriding justification for their removal. Such tree should inform the design layout and be integrated into new developments accordingly. Justification for the loss of this tree has been requested in previous discussions but not to date provided. It is noted that these proposals have stated primarily financial reasons as a basis for justifying the removal of T8.
- The 1.5m buffer hedge: the gardens are very small and even a narrow hedge here would soon dominate the smaller gardens. Hedges have potential to become quite large / spreading, so could become a source of resentment rather than valued by future occupiers. There is likely to be post development pressure under to cut back, remove etc. Unlikely to be sustainable or realistic in the long term unless gardens either increased in size or the layout revised Block J;
- Blocks A-C are in close proximity to the SINC – to the extent of being unacceptably close. The footprint of the new blocks encroach directly onto the SINC and there would be additional pressure / encroachment during construction – the working space required, scaffolding, piling works, etc – it

will need to be shown that this is achievable via specific and detailed construction method statement and through appropriate supervision / monitoring etc. It is questionable whether the relationship between the SINC and multistorey buildings is sustainable in the long term. It has not been demonstrated and the applicant's own tree report refers to the SINC being directly affected by the proposals. It should be emphasised the SINC lies outside the application boundary and is a council-owned asset;

- The info provided to date is not sufficient to allow proper assessment of the full or long-term impact. In particular the feasibility of such a scheme in close proximity to existing trees. A tree protection plan and method statement should be provided to minimise the impact on the retained trees.
- On the basis of the information requested and in Bartletts' view they consider the value of new trees to balance those lost to the proposal, the CAVAT is acceptable to justify the loss of the Category A oak.

The proposal should however be refused for the following reasons:

As per the BS5837 recommendations, the presence and proximity of existing trees needs to be taken into account in the design process, and a realistic assessment of the probable impacts of any proposed development of the trees and vice versa. Factors need to be taken into account as part of the impact assessment including:

a) Cumulative impact of RPA incursions eg from excavation for foundations, utility installations, the working space required for construction eg scaffolding; location and space required for temporary / permanent apparatus and service runs, drains, gas, water, electricity etc utilities. Where appropriate scaled cross-sections should be provided to demonstrate feasibility

b) Shading of buildings: Proposed buildings should be designed to take into account existing nearby trees, their ultimate size and density of foliage, and the effect these will have on availability of light. The proposed new build is in close proximity to the SINC woodland – 1m at its closest pinch-point – with bedrooms proposed which face this woodland area. The effect this will have on the availability of light, especially where rooms are proposed which require a certain level of natural light, does not appear to have been fully assessed in the information provided to date (either as part of the BS5387 survey or within a separate daylight / shading assessment)

### **LBH Landscape Architects**

#### *Comments after second consultation*

Much more detail is required to fully understand the landscape strategy and this could be conditioned, however the detail design should be subject to further discussions and may require some of the proposed spaces to be altered and adjusted. If minded to approve the application conditions relating to the following should be included:

- Landscaping to be Approved

The hard and soft landscape details are to include the following:

- a) A scheme for detailed hard and soft landscaping of the development;
- b) Details of all furniture, boundary treatment, natural type play equipment, specification for the proposed supports and fixings for plants, , landscape

structures and any pergolas and climbing plant frames, including proposed material and source /manufacturer and irrigation for plants and detailed drawings of such; for all communal areas, raised beds and bespoke furniture.

- c) Green and brown roofs, hard and soft landscape details and planting plans, and associated features. Details of the proposed ongoing plant replacement, for any plant failures on the structures for plants attached or adjacent to the building, during the lifetime of the built development.
- d) Full scale metric cross sections and elevations for all communal open amenity and play spaces and including podium gardens (at a scale of not less than 1:100) including the proposed details for level changes.
- e) Detailed drawings (at a scale of not less than 1:100), and a specification of all natural type play equipment to be installed including any specific specification of the surface treatment within the play areas;
- f) Details of lighting to all exterior communal areas including locations, lighting design, lighting details, specification, elevations, light spillage and lighting levels. The exterior lighting would need to take account of any biodiversity recommendations or requirements, such as bat friendly lighting.

- Hard landscape Material Details (this can be a separate condition or can be included in the Landscaping to be approved condition, in above condition a.
- Boundary Treatment or, this can be included, as noted, in above condition b)
- Levels – a detailed Levels Plan of the proposed finished levels.
- Japanese knotweed – to eradicate all the Japanese Knotweed from the development site, before the start of any construction works.
- Landscaping Scheme – Proposed implementation and implementation programme, including a period of 5 year period for replacements of soft landscape
- Landscape Management Plan and Landscape Maintenance of the hard and soft landscaping within the development, green/biodiverse roofs.
- A long term Landscape Management Plan for the whole of the proposed development to ensure the future success of the development, including the long term aims and objectives for all

the communal outdoor amenity spaces.

Sunlight daylight study shows 50% of the outside amenity space has less than 2 hours of direct sunlight a day and of particular concern are the small private garden spaces for Blocks F, G and H, houses A and B, the Maisonettes and Mews blocks which are shady in the majority, with less than 2 hours of direct sunlight. Refer to Pages 18, 19 and 53 of the daylight / sunlight report. The smaller play area amenity space is mostly shady, 80.5% with less than 2 hours of direct sunlight each day. Note 9 out of 38 amenity spaces met the BRE guidelines of 2 hours of sun a day.

- Concern still remains.

Levels- minimal information provided on the proposed level changes – this can be conditioned.

Boundary Treatment – I am unable to find information on boundary treatment – this can be conditioned.

Visual Impact Assessment The report shows seven viewpoints and the proposed development would be visible to greater or lesser extents from all of the views. View 4 West Harrow Recreation Ground, from the central east west path through the park. This view illustrates clearly the change of view in the park, with the proposed new development being highly visible and the visual impact the proposed flats would have on the park. To the west side of the park when standing in the nature area ((south west corner) and the tennis courts the scale and mass of the proposed development would dominate the view to the west. The proposed development would also have a high visual impact on the allotments to the north, changing the outlook, from semi –rural to urban built form, with unattractive views of the proposed flats and housing, which would dominate the space. In close proximity, the new development would be highly visible, changing the appearance of the site from semi rural to urban, which would be out of character with the surrounding more sub – urban and semi-rural area.

- Concern still remains

**LBH Waste Officer**

No objections, subject to condition requiring servicing plan during each phase of construction.

**LBH Housing Enabling Manager**

*First Consultation Response*

The Council's LAR target bed size mix has been calculated to meet the borough's priority need, with its greatest needs being for 2 and 3 bed LAR units and a person occupancy mix for London Affordable Rent of 2b 4 person and 3b 5 person units. So of the LAR units provided, Housing require 40% to be 2 beds and a further 40% to be 3 beds (10% 1 and 4 beds respectively). I notice that the LAR units have about 45% 1 beds and no 3 beds which will not meet Housing's requirements to be compliant, and therefore would require a greater number of 2 and 3 beds closer to the above-mentioned ratios.

- Housing have no comment on the size or configuration of London Shared Ownership units (including no comments about wheelchair units).
- Housing will require 10% of all the LAR units (4 or 5 LAR units in this case) to be fully wheelchair adapted, with a 2 / 3 bed preference. The AH proposal states 3 LAR units will be 'wheelchair accessible', which isn't clear if the units will be fully adapted for a wheelchair user at handover; this will need to be clarified. Also, the number of LAR wheelchair adapted units will need to match our requirements to be compliant.
- For the sake of handling the management and service charge of the AH units on in scheme, Housing require the LAR units to be in a separate core to any private units; however the LAR can share a core with the LSO units. (The LSO units could also share a core with private units). Information provided from the Design and Access Statement suggested that AH would be in separate cores by themselves, however did mention that three units in Block B in the western part of the site are to be affordable. The tenure of these 3 units be clarified to confirm no LAR units will be sharing a core with

private units.

- In terms of internal layout of the LAR units, Housing do not want en-suites however to meet the needs of our applicants Housing would like a separate living / dining room and kitchen areas if possible. A separate bathroom and shower room / WC in the 3 bed units would also be ideal.

Second Consultation Response – following amended offer

A lower level of affordable housing in order to get closer to our target bed size mix would be appropriate. The priority need is for 2 and 3 bed affordable rent units and at the moment only 1 and 2 beds are being offered and we do not require that high proportion of 1 beds.

The applicant seems to be willing to bring forward a scheme on their mix which returns a £4m deficit without grant but not to bring forward an alternative mix that meets the Council's target mix but also returns a £4m deficit with grant (albeit a slightly higher deficit). We are not clear why they are not keen to assume grant would be available given the 2 grant programmes (see below).

Suggest they get an RP on board to fully advise on the grant position. Depending on the timescales of bringing this forward, an RP will either bid for grant under the current 2016-23 grant programme which funds London Affordable Rent for starts on site up to 2023 (LAR has been assumed in the viability) or they may be able to secure more grant that has been assumed in the viability on a negotiated grant basis, under the new grant programme 2021-26 for starts on site between those years which will fund rented properties at social rent levels. We think clarification from an RP would be helpful at this stage as we always encourage early contact with RPs for this very reason.

The current mix proposed is not a compliant mix (35% LAR to 65% S/Own). The council's required tenure mix is currently 60% LAR to 40% S/Own – (there are some ongoing discussions to update these in line with the new London Plan which may mean we have a new target of 70% LAR to 30% S/Own but this has not been finalised yet. For now effort should be made to achieve a compliant mix.

**LBH Biodiversity**

*Comments after second consultation*

In summary, what is proposed would impact negatively on biodiversity and could not be considered to constitute sustainable development.

The ecological information now provided about the site itself has been improved and apart from some minor points, highlighted to the applicants' consultant, the surveys were appropriate, with the constraints seemingly a result of delays in the applicants commissioning the works once the flaws of the information submitted originally had been highlighted. However, despite the very close proximity of the adjoining SINC to the proposed buildings there has been no evaluation of the SINC or the likely impacts on it. At the same time, apparently without discussion with the landowner, some of the provided documentation suggests that the SINC might be enhanced. This in itself is unacceptable.

A key issue with the proposals is that they have been developed without the necessary consideration of biodiversity from the outset, with the result that not only would the sites main features of value be lost but there would be unacceptable impacts on the SINC and the local ecological network. Whilst under the mitigation hierarchy, this might be justified in certain circumstances, were there overriding reasons for permitting the development as proposed, this would be dependent on acceptable measures to offset the impacts and provide gain for biodiversity. The applicant has not quantified the development impacts or the value of the limited onsite mitigation proposals.

Although these points had previously been flagged up to the applicants and discussed with their consultant, the revised proposals include no identification of options for offsetting the direct and indirect impacts of the development if permitted. The onsite mitigation and gain proposals are inadequate.

Accordingly, the proposals do not represent sustainable development nor do they meet the requirements of the National Planning Policy Framework, the London Plan or local planning policy with regard to biodiversity. The presented scheme is unacceptable and that this could not be remedied by application of conditions.

Any future redevelopment of the site will need to be framed in relation to biodiversity issues.

It is noted that the applicant undertook preparatory works without the benefit of planning permission and that whilst discussion of this was set aside whilst we were awaiting the submission of the revised application, this will need to be resolved. Any planning application now coming forward will also need to take account of the biodiversity value of the site prior to those works being undertaken.

The Biodiversity Metric does not take into account the ongoing post-development impacts on the remaining and newly created habitat, and this will also need to be taken into account in the assessment of (a) the actual value of any mitigation and gain within the site and (b) impacts on the adjoining SINC and other areas. The applicant has not attempted such assessment although the need for this was previously highlighted.

The applicant has belatedly provided their assessment of the pre- and post-development biodiversity value of the site in terms of biodiversity units and has now suggested that a payment could be made to the Council so that it might undertake the required offsetting on the applicant's behalf. Whilst this would be feasible in principle, any assessment and requirement would also need to take account of the indirect impacts of the proposals as indicated to be acceptable in ecological terms, and any sum to be paid would need to be proportionate. Neither is the case here.

The applicant's agents have made reference to figures previously floated by Defra in relation to an average per biodiversity unit levy. This dates back to the impact assessment Defra undertook in support of the Biodiversity Net Gain

consultation in 2017 and the figures lack real world credibility. That is partly because – even setting land values aside – the unit costs of land management activities varies across the country, with the size/complexity and location and, more importantly, with the type of habitat to be created and thereafter maintained for an agreed (minimum 30 year) period. As an example, the creation of a single unit of urban woodland habitat is likely to cost £16,500 with 30 years maintenance (even setting aside the 20+ year period required for it to become woodland), the Council's administrative and insurance costs and the set up fees would take the total that would likely be required to around £61k for that one unit.

Had the applicant or their agents approached the Council to discuss biodiversity matters in a responsible fashion, in full accordance with the mitigation hierarchy, seeking to ensure that their proposals could be made sustainable, there could have been a discussion of the options whether with regard to the scheme itself or offsetting possibilities with regard to biodiversity. Again they chose not to do so, and the belated proposals would not make their proposals acceptable.

### **LBH Economic Development**

Please note the above, 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.

This will be secured through

- (i) a training and employment plan that will be agreed between the council and the developer prior to start on site and
- (ii) a financial contribution towards the management and delivery of the construction training programme based on the build cost of the development. This is usually charged based on a formula of £2500 per £1m build cost.

The applicant should consult with the council's Cultural Service if D1 use is intended exhibition hall, library / reading room, museum, for the display of work. The aim of consultation would be to maximise the benefit of such provision in Harrow

### **LBH Travel Plan Officer**

Cycling – Please include links to our website that promote local cycle training and cycling groups. Please also offer cycle training to residents who would like to learn

6.3.2 – Targets to be reviewed following the baseline survey and not in year 1. Please update as targets are quite ambitious and will need to be reviewed.

Measures/ Initiatives to be revisited following baseline survey. Please include in Travel Plan 7 – The TPC should be in place 2 months prior to development and Travel Planning team to be informed of contact details –

Travelplanning@harrow.gov.uk

Action plan – Please add action to have TPC in place 2 months prior to occupation

Please include a Monitoring section with details of how the plan will be monitored, including:

- Baseline Survey to be completed within 6 months of agreement (exact

options to be secured by agreement) and following surveys to be conducted in year 1, 3 and 5 following the baseline survey.

- All financial costs associated with the Travel Plan are to be provided by the developer
- Travel Plan is to be secured by agreement
- Travel Plan Monitoring fees/bond to be secured with the latter only to be used in the event of the development not meeting targets in year 5.

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

#### External Consultation

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

#### GLA

##### *First Consultation:*

Strategic issues summary

**Principle of development:** The applicant should provide further details on the community floorspace to show that it has been designed to meet the needs of a GP surgery. This brownfield site is an optimal location for residential development and the proposed residential units are strongly supported (paragraphs 16-23). **Housing:** 40% affordable housing by habitable room and unit is proposed is proposed split 60%/40% affordable rent/intermediate. This offer exceeds the 35% threshold for the Fast Track Route and is strongly supported. Grant funding must be investigated and further detail on the affordable rent levels and the intermediate housing income thresholds should be provided before the proposal can be considered under the Fast Track Route. An early stage review must be secured. None of the low-cost rent housing would be family-sized; the applicant should consult with the Council on increasing this provision to reflect local need (paragraphs 24-30).

**Urban design:** More prominent architecture and signage around the entrance to the GP surgery to aid wayfinding should be considered. Further urban greening to obscure the remaining area of inactive frontages should also be considered. The drawings should be revised to show a clear separation of pedestrians and vehicles on the central route through the site (paragraphs 31-39).

**Transport:** The development is generally acceptable in strategic transport terms. Improvements to the width and safety of pedestrian routes through the site are required and cycle parking should meet the London Cycling Design Standards. Appropriate conditions and obligations should also be secured (paragraphs 56-69). Further information on air quality, energy, water and urban greening is required.

**Officer comments:** *the above is noted. Full Stage 1 is appended to this report and each issue has been addressed in the Officer's appraisal below.*

##### *Second Consultation:*

**Housing -** It is noted that the scheme is now passing down the viability tested

route as a result of the absence of three-bedroom affordable family-sized homes, at the request of the Council. The proposed reduction in affordable housing from 40% to 0% is unacceptable. A 40% offer has already been presented to the Mayor at Stage 1; a reduction to 0% is wholly unacceptable and we would urge the applicant to return to the original offer or a Fast Track Route compliant offer, and so avoid further viability discussions. GLA officers require sight of the S106 agreement before a Stage 2 referral is made to check that these strategic requirements have been met. Should the proposal be unable to pass down the Fast Track Route then a late stage review would also be required.

GLA officers note that an FVA has been submitted to explain the lack of family-sized low-cost rented housing. Officers question whether other routes, such as swapping the shared ownership family-sized units could have helped address this issue, at least in part, without resorting to viability.

**Urban Design:** The applicant should consider whether planting could help to obscure the remaining area of inactive frontages, such as at the intersection of Blocks D and E. This is not evident from the updated plans.

**New path:** The proposed pedestrian and cycle access route from the site to West Harrow station will improve local connections and is strongly supported. As per the transport comments below, the delivery of this new route should be clarified and appropriately secured.

**Fire Safety:** The fire statement suggests that it follows London Plan Policy D12. However, the statement does not include all of the information required as part of Policy D12 and the guidance has not clearly been followed. Some details on access and facilities for the fire and rescue service, site access for the fire and rescue service, means of escape and construction methods and products are provided.

However, the statement recommends some revisions to the design and these have not been made. The statement also makes recommendations with respect to sprinklers - it should be clear whether these are being adopted outside of areas where they are not explicitly required by Building Regulations - officers would advise sprinkler provision in all dwellings as recommended by the London Fire Brigade. There are no details on the potential materials that may be used in the development. Information is required on the 'Golden Thread' of information and how this will be managed and the credentials of the authors of the report are missing.

The statement also equates firefighting and fire evacuation lifts, which are not the same. Policy D5 is clear that fire evacuation lifts must be provided in all lift cores.

**Trees:** Justification for the removal of a Category A oak tree has been provided. This matter should be finalised by the borough.

A CAVAT assessment has been provided. The CAVAT assessment concludes that the total value of trees to be removed is £220,891 (including trees already felled). The total value of the trees to be planted is £137,580. When discounting the value of the trees already felled (£123,244) the proposal results in a net gain of tree value. It is therefore important to understand why the trees already felled were removed. If this were to accommodate the proposed development then they should be included in the overall assessment. If this is the case, the CAVAT assessment would show that the development would result in a reduction in the value of trees on site and would therefore require improvement to compensate for tree loss. This should be clarified.

**Cycle Parking:** An additional short-stay space for the residential and D1 usage is required to comply with Policy T5. Clarification is required regarding the designation of the cycle parking spaces and building usage. Short stay cycle parking within the public realm should also be clearly marked on plans. This should be confirmed by TFL.

### **Thames Water**

As per consultation response to applicant included in Flood Risk Addendum.

### **TfL Infrastructure**

#### **Healthy Streets and Vision Zero**

Proposals to introduce wayfinding signage within and in the vicinity of the site are welcomed in line with ItP London Plan policy T2. TfL request a plan showing the location of proposed signage is provided.

#### **Car Parking**

Car parking proposed including blue badge parking complies with ItP London Plan standards, which is welcomed. Nevertheless, TfL encourages the applicant to review and reduce the level of car parking for the D1 use, to encourage active travel and in light of the Mayor's Transport Strategy (MTS) mode shift target. In addition, TfL would support the Council in an extension of the current CPZ to prevent parking overspill.

The applicant should confirm that provision for electric or other ultra-low emission vehicles will be provided for community use parking in line with ItP London Plan policy T6.

At present, car parking adjacent to blocks A, G and F is arranged perpendicular to access routes. Any car parking, including disabled persons parking, must be designed to avoid creating a car-dominant environment, and must not create hazards for vulnerable road users. All car parking should therefore be broken up with planting and landscaping, should be parallel to the street, and all surfaces should be permeable to ensure sustainable drainage.

A Parking Design and Management Plan has been produced and the measures proposed to manage and enforce parking provision are welcomed.

#### **Cycle Parking**

It is not clear from the ground floor plans which cycle parking is designated to the GP surgery and residential uses within Block J and for Block H where cycle parking is located. Short stay cycle parking within the public realm should also be clearly marked on plans.

TfL hold concerns with access arrangements to cycle stores for Blocks C and E which requires navigation of five sets of doors where the LCDS suggests a maximum of two sets of doors to satisfy both accessibility and security requirements.

#### **Servicing and Delivery**

TfL hold concerns with the interaction between servicing vehicles and

vulnerable road users along the proposed servicing route. Clarification on the delineation of pedestrian routes adjacent to the servicing routes is required and demarcated routes for pedestrians should be provided here to avoid a conflict of use and safety concerns arising, especially for those with visual impairments. It is hard to tell from the swept path analysis provided whether the large refuse vehicle can safely navigate the servicing route along the internal streets system without overhanging the pedestrian footway.

### **Design Out Crime Officer**

*Comments following second consultation:*

#### Landscaping

There has been little change to the landscaping, the design still facilitates a raceway for anti-social vehicle use. The path to West Harrow Station has not shown any anti-crime features being added. Most of the blocks are permeable on 4 sides, which will create area which could be exploited by people to commit crime and ASB.

#### Blocks A and B

External door recesses over 1 meter deep. Lack of postal strategy explanation, lack of defensible space for ground floor flat windows.

#### Block C, D, E

External door recesses is over 1 meter deep, blocks C and D will need full compartmentation for Secured By Design, this will mean a security tested and certified doors sets at the lift foyer exit and stair exit (marked red below plan excerpt) for each floor. For the 1st floor and extra security door will be required (marked yellow) so that residents can access the podium garden, without compromising the required compartmentalization.

The Block E ground floor flats require designed in defensible space for their windows.

#### Blocks F and G

No interior plans have been submitted for Block F

The plans submitted for Block G are very concerning, the overall layout and design will not achieve a Secured By Design accreditation, this block requires a redesign, addressing the internal void areas, which could be exploited by criminals to commit crime and ASB. Full advice can be given to the architects, free of charge by myself or any other Metropolitan police design out crime officer.

#### Block H

No secure postal lobby's, and lacks defensible space for ground floor homes.

#### Block J

No submitted plans for the residential floors. Lack of defensible space for the ground floor windows.

### **In conclusion**

The submitted plans would fall short of achieving any secure by design

accreditation.

There are issues with all the individual block plans, which will need to be addressed, some need a lot more work than others.

If planning is refused for the submitted plans, I suggest the developer or / and architects contact myself or the NW DOCO team, for a full consultation into the block details prior to submitting any further amended plans.

**Historic England (GLAAS)**

No archaeological requirement.

**London Underground**

No objection in principle however it is situated close to railway and therefore conditions ensuring there are no short or long term effects on railway infrastructure, detailed design and method statements in consultation with London Underground. Requirement for demolition and construction details on all structures.

**Natural England**

No objection

**NHS**

We have discussed the health opportunity on this site and as noted previously by the CCG to the council it is not a strategic priority. Funding and strategic support is prioritised for the centre of the borough to meet the housing zone growth. New premises are often exorbitantly expensive for health both in terms of capital required to fit out/equip the new premises and the significant ongoing cost pressure the rent that we are charged on these sites incurred.

A health centre on this development would only therefore be considered if it was offered as a turn-key solution (ie fully fitted with no capital costs to be met by the CCG inclusive of SDLT/legal fees for primary care) and offered at a 'peppercorn' rent.

**Ministry of Defence (MOD)**

The MOD requests that a condition for the submission of a Construction Management Strategy be included in any planning permission granted to ensure that the MOD is notified of when and where cranes will be erected.

In conclusion, provided the maximum build height does not exceed 25m 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. It is important that the conditions requested in this response are included in any planning permission granted as per Planning Circular 01/03: Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas, if Harrow Council decides to grant planning permission contrary to our advice then we must be notified 28 days prior to a decision being made.

## **5.0 POLICIES**

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that:

'If regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the Plan unless material considerations indicate otherwise.'

5.2 In this instance, the Development Plan comprises The London Plan 2021, The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan (AAP) 2013, the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan SALP 2013 [SALP].

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

## **6.0 ASSESSMENT**

6.1 The main issues are;

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

### **6.2 Principle of Development**

6.2.1 The relevant policies are:

- NPPF
- The London Plan: GG2, H1, H10, S1, S2
- Core Strategy: CS1Z
- Harrow Development Management Local Policies: DM24, DM46, DM47

6.2.2 The existing site comprises a religious meeting hall (D1 use) of 900sqm and associated car parking. Core Strategy Policy CS1Z encourages social infrastructure where it is needed to serve existing or proposed development and resists the loss of such facilities unless adequate arrangements are in place for their replacement or it results in an enhancement of other existing facilities. The application proposes the redevelopment of the site to re-provide the floorspace,

albeit comprising a different end user, namely a health clinic. Although acceptable in respect of the re-provision of community floorspace, the suitability of the site to provide for this function requires further consideration and would therefore be subject of Policies DM46 (new community facilities) and DM47 (Retention of community facilities) of the Harrow Development Management Local Policies (2013) in relation to community infrastructure.

#### Loss of community floorspace

- 6.2.3 The London Plan 2021 considers community infrastructure and places of worship to fall within the definition of Social Infrastructure subject of policy S1, which seeks to protect London's social infrastructure and resist its loss. The existing use is not strictly a 'place of worship' as there is a use restrictive condition (25) on the existing permission (WEST/321/97/FUL) which confines the use of the facility to a 'meeting hall'. Notwithstanding this, it is a meeting hall which had sought to serve a particular religious congregation and therefore still falls within the definition of social infrastructure, which includes 'places of worship' and on the basis of it serving members of the local community at one time. Notwithstanding this, the proposal comprises a re-provision of the existing floor space to provide for a new health facility (Doctors Surgery) which is supported by London Plan policy S2 subject to separate criteria reviewed below.
- 6.2.4 In terms of local policy, the demolition of the existing meeting hall on the site would not result in a 'refurbishment and re-use' of the existing premises. Accordingly, the proposed development would not comply with DM46A. Prior to considering the scheme against the remainder of DM46 relating to the provision of new community facilities, it is noted that strictly speaking the community floorspace on the site (in terms of quantum) would be retained. As such, the proposal can be assessed against DM47B which provides guidance on the retention of community floorspace.
- 6.2.5 Policy DM47 provides guidance on retaining existing community, sport and education facilities. The like for like re-provision of floorspace at least would therefore find some favour with DM47B which would provide for the redevelopment of the community facilities on the site. However, this would be limited to an enhancement of the physical building itself, which could be a more useable / functionable space than that which is currently located on the site. The proposed replacement floorspace however would not be able to re-provide the amount of car parking that is currently located on site and given the very poor location of the site (from an accessibility perspective) would not result in an enhancement of the existing provision. Balancing out the re-provision of the community floor space on the site, it is considered that given the location of the site, the amount of floorspace and the proposed car parking quantum, the proposal would not on balance provide an enhanced provision on the site. As such, DM47 relating to the retention of community facilities would not be applicable in this case. In discounting the aforementioned policies, it is clear that the proposal seeks to provide a new community facility and should therefore be assessed under policy DM46B.

## Proposed Doctors Surgery

- 6.2.6 In September 2020 the Town and Country Planning (Use Classes) Order 1987 (as amended) was updated. Accordingly, the proposed Doctors Surgery would now fall under Class E. This would mean that the existing community use would fall under Class F.1. The Use Classes in effect prior to 1 September 2020 will be the ones used only during the 'material period' i.e. until the end of July 2021, after which the determination must be made against the new use classes order. As the current application was submitted prior to September 2020, for the purposes of the current application the existing and proposed uses would be considered as part of the same use class (D1).
- 6.2.7 The application proposes that the replacement floorspace is used as a Doctors Surgery (D1 use). Evidence provided details that there is a need for further doctors surgery floorspace within the area, with there being on average 2,397 patients per GP (best practice being 1 GP per 1,800 patients), when considered against the 5 nearest GP surgeries. The proposed development therefore seeks to provide 900sqm for Doctors Surgery / Medical facility. The London Plan (2021) provides support for Doctors Surgery through Policy S2 (Health and social care facilities). This policy under S2A (1-5) requires a number of evidence base work to be undertaken by the borough, in conjunction with the Clinical Commissioning Groups (CCGs) and other NHS and community organisations. Specific to development proposals, boroughs should support the provision of high- quality new and enhanced health and social care facilities to meet identified need.
- 6.2.8 Given the above, the proposed development that would result in a re-provision of the community floorspace must be considered against DM46 for New Community, Sport and Educational Facilities. The applicant has stated that as the religious congregation has moved out of the local area, the hall has ceased to be used as a religious meeting hall since February 2017 and is now vacant. This would therefore suggest that the proposal may no longer be located within the community in which it seeks to serve, whereby falling foul of DM46B(a). Although, marketing may suggest that another user within the same use class (and continuing to comply with the condition on permission WEST/321/97/FUL) may be interested in picking up the floorspace. Evidence that this exercise has been undertaken has not been provided, and therefore the LPA cannot be satisfied that the requisite community use is no longer located within the community in which it intends to serve.
- 6.2.9 Notwithstanding this, the proposal seeks to replace the floorspace on site, with that of a Doctors Surgery. For such a use, it would need to demonstrate that it would be located within the community in which it intends to serve, as required by Policy DM46Ba. The submitted information does provide detail in terms of general need for a doctors surgery / medical facility, given there are more patients per GP than is best practice as noted above. The applicant therefore considers that the proposed floorspace would assist in alleviating this pressure, where a local GP surgery (The Ridgeway) could move in, or it could be used for wider medical care floorspace.

- 6.2.10 The Planning Statement states that initial discussions were held with The Ridgeway Surgery as part of their wider primary care offer network. Although there is no policy requirement to secure an end user, it is not clear that The Ridgeway Surgery is in a position to take up the entirety of the space. Since the updated Planning Statement (Rev B) which stated that 'initial discussions' had been undertaken, since then no further progress appears to have been made. Ongoing discussions between Harrow Council and the CCG/NHS indicate that financially it is unlikely that funding would be available for the fit out of any medical facility from NHS/CCG. The NHS/CCG have allocated budgeting for other strategic sites within Harrow, which result in funding for this site not being available. Whilst the applicant has provided figures that detail that current surgeries are over capacity, given the uncertainty around the actual end user, it is unclear whether an end user can be secured to ensure that the use would be within the community which it intends to serve.
- 6.2.10 Notwithstanding the above, the applicant has demonstrated that there is a need for such a facility within the area, and the delivery of such a facility would be welcomed in that regard. The applicant has also provided revised floorplans for the medical facility, which now show detailed layout for a medical centre. Firstly, it is not clear if there has been any further dialogue between the applicant with The Ridgeway Surgery in developing this, nor any dialogue with NHS /CCG regarding meeting general layout guidelines. By reason of this, it is not clear if what is proposed would actually be fit for purpose. In the event that the layout would be fit for purpose, then this floorspace should be secured and the applicant should deliver this fit out by way of further detail on how this community use is able to be brought forward in terms of funding.
- 6.2.11 Notwithstanding this, it has been demonstrated that the community use proposed would meet the requirements of policy DM46B given that the intention of the new health facility would meet an unmet local demand for health facilities, the proposed highway measures in place to promote sustainable travel would ensure it would be located in a sustainable location and it is considered that there would be no adverse impact on residential amenity (see section 6.7) or highway safety as a result of the facility (see section 6.7). Had this application otherwise been acceptable the use as a Doctors Surgery and internal layout would have been secured by way of condition.

#### *Restrictive Covenant*

- 6.2.12 Matters relating to any restrictive covenants, including to the application site are not material planning considerations. Accordingly, no further reference will be made in respect of this matter, given the enforcement of a covenant is entirely separate to, and has no bearing on, the Council's role as Local Planning Authority.

#### Residential Use

- 6.2.13 It is acknowledged that the site has not been included in the Council's Brownfield register, however, there are no designations on this land which would prevent some form of development in principle. The site has already been developed for use as a community Gospel Church Hall with associated car parking comprising

predominantly of hard standing and is therefore considered to be Brownfield Land (NPPF 2019).

- 6.2.14 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. Policy H1 of the new London Plan increases the minimum housing target for Harrow 802 homes per annum over the period 2020-2030. 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. 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.
- 6.2.15 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. Specifically, the proposal for the provision of housing on the site is consistent with the Strategy's broader objective to meet development needs on previously developed land, and to do so in sustainable locations, without resorting to development on greenfield and garden land.

### **6.3 Housing Output**

6.3.1 The relevant policies are:

- National Planning Policy Framework (2019)
- The London Plan 2021: GG4, H1, H4, H5, H6, H10
- Core Strategy: CS1I, CS1J, CS8I
- Harrow Development Management Local Policies: DM24, DM50
- Mayor of London Affordable Housing and Viability Supplementary Planning Guidance (2017)
- Mayor of London Housing Supplementary Planning Guidance (2016)

#### **Housing Mix**

- 6.3.2 The London Plan policy H10 encourages new development to offer a range of housing choices in terms of mix and housing sizes and types. This is reinforced by Core Strategy Policy CS1 which requires new residential development to promote housing choice to meet local needs and to maintain mixed and sustainable communities. Development Management Policy DM24 states that "the appropriate mix of housing will be determined having regard to the location of the site, the character of its surroundings and the need to optimise housing output on previously developed land."
- 6.3.3 It is noted that the proposed development seeks to deliver 75 x 1 beds, 74 x 2 beds, 25 x 3 beds and 4 x 4 bed units. Whilst the Local Planning Authority is unable to prescribe a housing mix for market sale dwellings, it does seek to

ensure there is an appropriate housing choice delivered within a scheme, which is in part informed by local evidence base. It is noted that the proposed housing mix is weighted slightly more toward the lower occupancy than desired. However, and noting the above inability to prescribe the mix, the application would provide housing choice and a meaningful addition towards the Borough's housing stock.

- 6.3.4 It is therefore considered that the provision of a range of unit sizes including family sized units as well as a mix of tenures would on balance represent an appropriate housing mix and given that development on previously developed land and in accordance with the policies mentioned above.

**Table 1: Housing Mix**

	1B 2P	2B 3P	2B 4P	3B 5P	4B 6P	Total	Tenure	W/C
<b>Block A</b>		1	6			<b>7</b>	LAR	1
<b>Block B</b>		1	6			<b>7</b>	Private	1
<b>Block C</b>	18	4	8	4		<b>34</b>	Private	5
<b>Block D</b>	19	4	8	4		<b>35</b>	Private	6
<b>Block E</b>	19		7			<b>26</b>	Private	1
<b>Block F</b>	3		6	6		<b>15</b>	Private	
<b>Block G</b>	8	3	6	6		<b>23</b>	Private	2
<b>Block H</b>	6	2	4			<b>12</b>	Intermediate	4
<b>Block J</b>	2		8			<b>10</b>	Intermediate	
<b>Houses A</b>					4	<b>4</b>	Private	
<b>Houses B</b>				5		<b>5</b>	LAR	
<b>TOTAL</b>	<b>75</b>	<b>15</b>	<b>59</b>	<b>25</b>	<b>4</b>	<b>178</b>		<b>20</b>
	<b>42%</b>	<b>8%</b>	<b>33%</b>	<b>14%</b>	<b>2%</b>	<b>100%</b>		<b>11%</b>

### Housing Density

- 6.3.5 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 to determine the optimum development capacity of sites, which is set out in detail under Policy D3 of the London Plan.
- 6.3.6 The design considerations of the development have been considered in detail within the subsequent sections of the report. As noted in the submitted Design and Access Statement, the application proposal has been the subject of extensive pre-application discussions with the Council and has evolved in response to design scrutiny following Design Review Panels and discussion with Council Officers. It is considered that the proposed design of the site effectively optimises development on a brownfield site and is supported by proposals to enhance and encourage sustainable travel within and around the site, whilst responding to the local context.
- 6.3.7 Whilst it is acknowledged that concerns have been raised with regards to the increased heights of the buildings, overdevelopment of the site and the subsequent increase in density, such an increase would be supported in strategic

terms by optimising site potential and density through high quality design. Officers acknowledged that there is not an infinite supply of land available to deliver high density schemes in order to meet current housing targets, the LPA is required to consider where suitable to maximise development potential on brownfield land, in particular on key strategic sites. For the reasons set out above, and as the density proposed has been achieved using a design-led approach, officers consider that the density of the proposal would be acceptable. Furthermore, any significant reduction in the density of the development could constitute an under-utilisation of the site (in the context of growth), with further implications for viability of the development and subsequent delivery of affordable housing.

### **Affordable Housing**

- 6.3.8 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).
- 6.3.9 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.
- 6.3.10 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.
- 6.3.11 In terms of tenure split, Policy H6 of the London Plan requires a minimum of 30% of homes to be affordable rent or social rent, 30% to be intermediate products which meet the definition of genuinely affordable housing, and the remaining 40% to be determined by the borough as low cost rented homes or intermediate products. At a local level, Harrow's planning obligations require that the Affordable units are split by tenure: 60% London Affordable Rent (LAR) to 40% London Shared Ownership / Intermediate (LSO).
- 6.3.12 It is noted throughout the pre-application discussions and within all the supporting documentation, that the applicant originally proposed a 40% offer of Affordable Housing, with a 60% offer of London Affordable rent and 40% of Shared

Ownership. However, a financial viability assessment has now been submitted and the applicant has withdrawn its offer, stating that the scheme cannot viably provide an affordable housing contribution. The withdrawal of the affordable housing offer significantly reduces the planning benefit of the scheme. Notwithstanding the findings of the viability review, the applicant has now proposed a 'without prejudice' offer of 20% affordable housing by habitable room (19% by unit) which would deliver 34 affordable residential units (99 habitable room), of which 12 would be at London Affordable Rent (LAR) and 22 would be an intermediate product. The tenure mix is provided in Table 2 below.

**Table 2: Affordable Housing Tenure and Mix**

Affordable Housing Units						
Tenure	1B 2P	2B 3P	2B 4P	3B 5P	Total Units	Hab rooms
Affordable Rent		1	6	5	12	41
Intermediate	8	2	12		22	58
<b>TOTAL</b>	<b>8</b>	<b>3</b>	<b>18</b>	<b>5</b>	<b>34</b>	<b>99</b>

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

	Total Units (Entire Scheme)	AH Units	% of Total
<b>Units</b>	178	34	19%
<b>Habitable Rooms</b>	492	99	20%

- 6.3.13 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 73 units (40% by habitable rooms) out of the 178 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 197 habitable rooms to be provided as affordable housing. When taking the policy compliant split (60/40) into account by habitable rooms, this would require approximately 118 habitable rooms to be provided as London Affordable Rent and approximately 79 habitable rooms to be provided as an intermediate tenure.
- 6.3.14 The Council's Housing Officer has reviewed the offer by the applicants and notes that the scheme offers 34 Affordable Housing units which equates to 19% of the total units, which falls short of the borough wide target. The Mayor also requires Affordable Housing to be calculated by habitable rooms with a target requirement of 35% AH to be offered to qualify for fast tracking. As the scheme is offering 20% AH by Habitable rooms the applicant did not qualify for fast tracking and was required to provide a Viability Assessment which was assessed independently to prove the AH offer (34 units) represents the maximum reasonable AH achievable on the scheme.
- 6.3.15 The applicant submitted a Financial Viability Assessment (prepared by BNP Paribas) which was reviewed by the Council's external viability consultant

(Bailey Venning Associates (BVA)) as well as the Greater London Authority (GLA) respectively. On review, both the LPA's consultant and GLA found the initial maximum reasonable offer of no affordable housing to be significantly lower than the threshold set by the Mayors London Plan and Borough wide target of 40% and considered that some level of Affordable Housing could be provided. In order to determine what is deemed maximum reasonable, both BNP and BVA have been in dialogue. However, there are a number of points of contention which have not been resolved:

- Construction Costs;
- Value of healthcare centre; and
- Benchmark Land Value.

#### *Construction Costs*

- 6.3.16 Both the applicant and LPA's viability consultants used external cost consultants (Saville Brown and Daniel H Consultancy Ltd – DHC) to review the projected build costs of the development. However, it is the LPA's understanding that the applicant does not rely on the figures provided by the external cost consultant and have instead applied the Building Cost Information Service (BCIS) to the proposed development which is published by the Royal Institution of Chartered Surveyors (RICS) who provide cost and price information for the construction industry. BCIS publishes a range of figures for different types of residential development. It also publishes a range of different points in the data distribution. For any given development form, BCIS publishes the lowest figure recorded in their dataset as well as the highest, the lower and upper quartile, median and mean. BVA consider BNP's report to be based upon an estimate of costs which applies the upper quartile allowance for apartments of six or more stories to the whole of the proposed development. This in itself is not accurate given that the proposal varies from 3-7 storeys (Blocks A, B, F, J and H all being below the 6 storey threshold), which would lend itself to a lower rate being applied. A response to this was not provided by BNP, despite over half of the residential blocks being below 6 storeys.
- 6.3.17 Notwithstanding this, in conducting their own cost review, BVA applied the upper quartile costs for the residential element (even though these would only be applicable to blocks higher than 6 storeys) but applied the BCIS lower quartile rate to ancillary areas such as parking and cycle areas which are generally costed separately and cheaper to build. This resulted in a lower construction cost than that derived by BNP. The LPA's cost consultant (DHC) similarly also concluded that the costs would be reduced in comparison to the Savile Brown cost plan but would be higher than those adopted by BNP in their appraisals (although it should be noted that these costs would be lower if the lower quartile BCIS figures were applied to the medium rise blocks). It should be noted that Savile Brown were not requested to respond to the BHC cost plan, however both BVA and the GLA remain of the view that the costs stated appear extremely high for a development of this nature. The applicant therefore remains of the view that based on the information submitted the 'without prejudice' offer of 20% would exceed the maximum reasonable amount. However, on advice from BVA, the LPA do not consider the costs to be accurately calculated and without an agreed cost plan, the LPA are unable to determine whether the offer is the maximum reasonable.

### *Value of health centre*

- 6.3.18 BNP Paribas have asserted a value to the proposed GP Surgery, based on other rents of other similar facilities ranging between £219/m<sup>2</sup> and £421/m<sup>2</sup>. BNP then applied ascribed rent at the bottom of that range (£220/m<sup>2</sup>), which BVA claim to be conservative given that the facility would be a fully fitted, modern and purpose built. From discussions with the NHS/CCG it has been indicated that the organisations are unlikely to take up the space unless it is provided at a 'peppercorn rent.' Notwithstanding this, should the space be occupied privately the 'conservative' rent applied by BNP is questionable, particularly if the lowered rate has been applied to attract the National Health Organisations. BNP remain of the view that the lower rent should be applied.

### *Benchmark Land Value (BLV)*

- 6.3.19 Both BVA and BNPP have not agreed a BLV albeit BNPP have adopted a value of £4.5 million. BNPP have arrived at this conclusion on the basis that the applicant had received offers for the site in 2018 when it was marketed. A range of offers were received, including 4 from religious organisations for their intended use. These offers ranged from £4,500,000 to £9,250,000. In provisionally accepting BNP's BLV and the lowered rent value of health facility BVA arrive at a Residual Land Value of £5.37m (with no grant) which is substantially above the Benchmark Land Value applied by BNP, which suggests that there is a surplus that could contribute towards further affordable housing units. The GLA concur with BVA in that the value of the new health facility and profit levels should be reviewed to provide an a BLV which could potentially provide an improved viability position.
- 6.3.20 Notwithstanding that there remains to be an unagreed position with regards to construction costs, BVA have provisionally adopted figures which appear to be unsubstantiated as noted above to derive whether the maximum reasonable offer has been put forward. Whilst the applicant has offered a mix of family housing, based on the information before the LPA it is not considered that the maximum reasonable offer has been made. Furthermore, the availability of grant from the GLA does not appear to have been explored which, if available could further enhance this offer.

### **Tenure Mix**

- 6.3.21 In order to further test whether the proposed scheme offers the maximum reasonable it is necessary to apply the offer of affordable housing against a policy compliant tenure mix. London Plan Policy H10 encourage a full range of housing choice. Policy H10 'Housing size mix' states that boroughs should provide guidance on the size of units required to ensure affordable housing meets identified needs. Harrow's Planning Obligations SPD requires a tenure split: 60% London Affordable Rent (LAR) to 40% London Shared Ownership / Intermediate (LSO). Policy H6 of the London Plan increases the requirement for low-cost rented accommodation to a ratio of 70:30 in favour of LAR. Based on the applicants offer it would therefore be required to achieve a split of 20 LAR / 14 LSO by unit to be compliant. The proposed offer comprises 12 LAR (41 habitable rooms) and 22 Intermediate (58 habitable rooms), which is a split of 35% LAR and 65%

intermediate which is inverted relative to policy, as the Council's greatest Housing priority need is for LAR units to meet the pressures of the Housing Register.

- 6.3.22 In terms of unit mix, the Council requires the following mix of affordable housing: 10% one beds, 40% two beds, 40% three beds and 10% four beds. The mix proposed comprises 26% one beds, 59% two beds and 15% three beds. Although the mix proposed is weighted towards 2 and 3 bed units in terms of occupancy which is welcomed, it is weighted towards an intermediate product which the Council's Housing Officer does not consider acceptable and would be contrary to the Council's Planning Obligations SPD, policy DM50 of the Development Management Policies Document (2013) and London Plan Policy H6. The Harrow Strategic Housing Market Assessment completed in 2018, which formed part of the West London Strategic Housing Market Assessment states that in terms of affordable housing tenure, there is a need for 9,600 additional affordable dwellings over the 25 year period 2016-41 (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 LAR 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. The tenure mix proposed is therefore unacceptable.
- 6.3.23 The Council's Housing Officers require 10% of LAR units to be fully wheelchair adapted, with a preference for these to be 2 / 3 bedroom units. The submitted Affordable Housing Statement indicates that 1 x 2 bedroom, 3 person unit would be wheelchair accessible as well as 4 of the intermediate units comprising 2 x 1 bed and 2 x 2 bed units. This generally complies with the requirement, although does not fully meet the bed size preference. For the sake of handling the management and service charge of the Affordable Housing units on in scheme, the Council require the LAR units to be in a separate core to any private units. Blocks A and House Type A would be fully LAR units whereas Blocks H and J would be dedicated to intermediate units. Given that the affordable units are distributed around the site it is questionable whether a Registered Provider would take up the units. Notwithstanding this, they all have separate cores and therefore on balance the location of these units is considered acceptable.

### **Genuinely Affordable Product**

- 6.3.24 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 London Plan (2021) across each of its Affordable Housing Policies, state that the Mayor will seek genuinely affordable housing to be delivered. Information in this respect has not been supplied and would have been necessary had discussions had the affordable housing been considered acceptable.

### **Summary**

- 6.3.25 In summary, there are a number of factors which remain unresolved in respect of the viability position. Based on BVA's financial viability review of the applicants offer in relation to affordable housing, BVA have identified a surplus of £800,000 which could potentially contribute to a further 4 to 6 affordable units. With the

availability of grant from the GLA, they conclude that this number could rise to £2m. Should this be the case, the LAR units could be accommodated within the existing cores / houses identified to be affordable homes, leaving the remaining intermediate properties to be included as part of the private blocks which the Council's housing department would accept. On this basis of the LPA do not consider the maximum reasonable level of affordable housing to be achieved.

- 6.3.26 In addition, the tenure mix in favour of an intermediate product results in a much lower quantum of London Affordable Rent, which there is an evidenced need for, and which offers much more in the alleviation of homelessness within the Borough. Accordingly, the 'without prejudice' offer put forward to the LPA is not considered acceptable and would be contrary to London Plan policy H5 and H6, Policy CS1. J of the Harrow Core Strategy (2012), The Housing Supplementary Planning Guidance (2016) and adopted Supplementary Planning Document: Planning Obligations and Affordable Housing (2013).

## **6.4 Environmental Impact Assessment**

- 6.4.1 The requirement of the Environmental Impact Assessment (EIA) Regulations 2017 is based on the likelihood of significant environmental effects arising from a new development and are divided into Schedule 1 and Schedule 2 applications under the EIA Regulations. Schedule 1 would normally constitute developments that would have significant effects on the environment such as major chemical projects or ground and air transport infrastructure. Schedule 2 consists of other forms of developments that are dealt with under a threshold approach. The proposals falls under Schedule 2, Part 10 (b) relating to *Urban Development Projects* at the development includes more than 150 dwellings. Given the quantum of development proposed together with the cumulative impacts of extant permissions, the development is considered to be EIA development.
- 6.4.2 The applicant requested an EIA Screening Opinion from the LPA (planning reference: P/1139/20) in accordance with the Regulations 6 (1) and (2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations'). The accompanying EIA Screening Appraisal assessed the proposal against Schedules 1, 2 and 3 of the EIA Regulations and the Governments Planning Practice Guidance (PPG).
- 6.4.3 The LPA concluded that the development was considered not be a development that triggered the thresholds, and therefore did not require an Environmental Impact Assessment to accompany it. It is noted that there have been amendments to the scheme, however these have not fundamentally changed the design and layout or the intensity of the scheme, including parking, unit numbers and community centre. Therefore, it is considered that notwithstanding the amendments to the scheme, the proposed development would still not trigger an Environmental Impact Assessment (EIA).

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

- 6.5.1 The relevant policies are:
- National Planning Policy Framework: Chapter 12
  - The London Plan: D1, D2, D3, D4, D5, D11, HC1

- Core strategy (2012): CS1B, CS1E
- Harrow Development Management Local Policies: DM1, DM2, DM22, DM23

6.5.2 London Plan Policies D1, D2 and D3 seek to ensure that new developments are well-designed and fit into the local character of an area. New buildings and spaces should respond to the form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhancement of the historic environment. London Plan Policy D3 also seeks to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and the capacity of existing and future transport services, using an assessment of site context and a design-led approach to determine site capacity. Whilst the density matrix has now been removed, the Stage 1 GLA response states that the scheme would have a residential density of 127 units per hectare, which is below the threshold for design scrutiny as set out in Policy D4 of the London Plan. However, the GLA considered that. Given the constraints of the site in terms of the Thames Water easement running through the centre of the site and need to avoid negative daylight and sunlight impacts on the allotments to the north, the proposed density is considered to effectively optimise the development of the site.

### Tall Buildings

6.5.3 Policy D9 (Part A) of the London Plan states: “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. This states at paragraph 5.15, that a taller, landmark buildings is any building at over 30 metres high. The proposal would not fall within this threshold given that the tallest blocks (C and D) proposed are less than 25m tall. The application and consideration of policy D9 in the London Plan (2021) is therefore not relevant here and is therefore not subject to design scrutiny in this regard. Notwithstanding this, a Townscape and Visual Assessment (TVIA) has been provided in support of the application which considers the impact of the proposed development on the townscape of the area around the site, through an analysis of the character of the surrounding townscape as well as an assessment on views from locations around the site.

### Townscape and Views

6.5.4 A study was conducted which set out potential view locations from which ‘before and after’ views are provided. The sites chosen are limited to those which the site can be seen from. Seven key locations were chosen. The TVIA notes that towards the north-western corner of the site, from The Ridgeway the difference in land level moving southwards rises to form a bridge across the railway lines (reaching the equivalent of approximately two residential storeys at this point). An embankment (SINC) comprising dense vegetation separates the site from The Ridgeway. West Harrow Recreation Ground lies on the opposite side of the railway to its south and forms the largest open space in the local area. The local

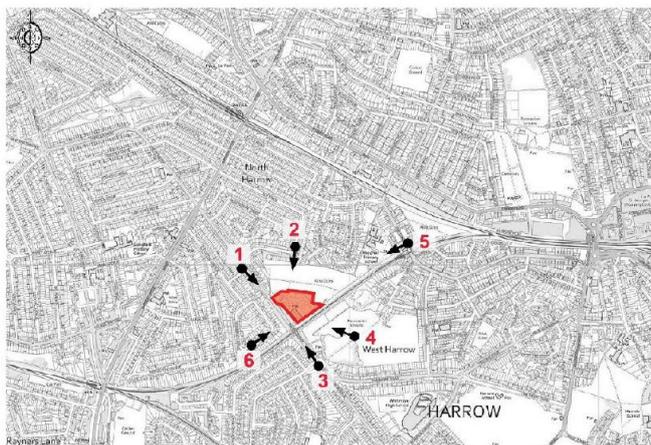
context beyond this in the immediate setting is suburban in character and largely occupied by low scale residential development. As a result of the topography of the site, the TVIA notes that the site is not visible to any great extent from much of the area surrounding it. Apple Grove residential development comprising a series of apartment blocks up to 7 storeys high is also set between two railway lines in a similar to that of the application site. There are no heritage assets within 500m of the centre of the site. The nearest locally listed building is located over 400m from the centre of the site. Image 1 indicates the views analysed.

PSC view no.	Location	Render / Wireline
1	The Ridgeway, junction with Alfriston Avenue	W
2	Elm Drive	W
3	The Ridgeway, junction with Welbeck Road	W
4	West Harrow Recreation Ground, centre	R
5	The Gardens	W
6	Fernbrook Drive	R
7	Old Redding (off-map)	W

**Notes:**

Viewpoint locations are approximate - exact locations, taking into account conditions on the ground, to be determined on site with PSC.

Approximate site boundary marked in red for indicative purposes only.



**Image 1: Townscape view location**

6.5.5 The most significant view impacts have been shown below (Image group 2), these include View 3 from The Ridgeway / Welbeck Road; View 4 - West Harrow Recreation Ground and View 6 – Fernbrook Drive. The TVIA concludes that whilst the height and overall scale of the Proposed Development would be greater than that of its surroundings, it would represent a different form of development and would be comparable to the existing Apple Grove scheme, also on a relatively self-contained site, with varying topographical circumstances and adjacent to railway lines which suggests that provided that effective design solutions are sought, particularly in terms of the distribution of mass in this case the impact of the visual impact of the proposed development could be limited.



View 3



View 4



View 6

**Image 2: Views 3 (The Ridgeway / Welbeck Road), 4 (West Harrow Recreation Ground) and 6 (Fernbrook Drive)**

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

### **Context**

- 6.5.7 The unique nature of the site and its immediate setting are atypical for Harrow and mean that a development of high quality and connectivity would be required to fully integrate into the wider borough, town centres and networks and the wider city. The proposed connection between the site and West Harrow Underground Station is therefore of high importance to the success of the scheme. A Thames Water surface water sewer (1200mm diameter) runs across the site in a south-westerly direction. Discussions with Thames Water confirmed that a total of 6m easement would be sufficient for the system. The site layout, amongst other things has been informed by this and other constraints described above.

### **Site Layout / Masterplan**

- 6.5.8 The design principles have been set by the wider context by locating the low-rise blocks (between 2-3 storeys) to the northern portion of the site, with associated gardens abutting this boundary to sensitively address the allotments beyond. The higher massing (4-7 storeys) is located towards the south which benefits from

natural vegetation cover, lower site topography and railway line which would ensure the development appears more akin to its surroundings in part and would minimise its visual impact from the surrounding area where it is more visible. The proposed new pedestrian / cycle pathway follows the natural desire line from the existing site entrance to the proposed eastern access towards West Harrow Station. The site seeks to minimise parking by creating podium car parks which would also ensure vehicle movements within the site are minimised and ensure a larger amount of useable and meaningful landscaped areas are proposed. Affordable Housing is distributed throughout the site which ensures the development would be tenure blind.

### **Massing, Scale and Built Form**

6.5.9 As noted above, it is considered that the proposed arrangement to locate the lower rise blocks to the northern part of the site and gradual increase in height towards the south would decrease the visual impact of the development by maximising the opportunities presented by the topography of the site and natural and existing buffers which bind the site, particularly to the south and west. Furthermore, a visual break between the stacked maisonettes and central block would allow for views towards the West Harrow Allotments. Three types of residential units are proposed, these include houses, maisonettes and apartment blocks. The development block heights and siting are as follows and Image 3:

Block A - 4 storeys - Central

Block B - 4 storeys - Central

Block C - 7 storeys - South

Block D - 7 storeys - South

Block E - 5 storeys - South

Block F - 4 storeys - Central

Block G - 4 storeys - Central

Block H - 3 storeys - North

Block J - 4 storeys – North (Includes a ground floor health centre / GP Surgery)

House A - 3 storeys - North

House B - 3 storeys – North



**Image 3: Site Block Plan**

6.5.10 The Urban Design Officer has reviewed the proposal and considers the site-wide stepping of massing from 3 to 4 to 5 and 7 storeys towards the south of the site to provide a successful transitional approach which would mitigate against overbearing and contextual relationship concern with the areas to the west and north of the site (namely the allotment gardens and Fernbrook Drive) as demonstrated within the TVIA and images shown above. On this basis, it is not considered that the development would have a significant negative impact on the character of the surrounding areas. Furthermore, the linear approach for the northern portion of the site is supported as this rationalises the massing and offers a greater scope for a shared surface or play street as well as fostering neighbourly relations. The massing at the rear of the Mews court is considered to be further mitigated against by the associated rear gardens and additional landscape buffer. This would create a visual and social buffer typical of allotment sites with potential for positive passive surveillance from homes to the allotments. The stepped nature of the massing of these terraces is considered to create visual breaks in the massing from the allotment gardens vantage point. It is therefore considered that the scale, mass and built form has been appropriately designed to address the wider context. Furthermore, the large separation distances from residential houses

### **External Appearance and Materials**

6.5.11 The layout, design and appearance of each individual / groups of blocks is assessed in detail below. Generally, it is considered that the articulation, material choice and façade / banding treatment at ground level creates visual interest by emphasising this plane for residents and pedestrians. There is a clear material language relation to entrances, ground level and private amenity features which is considered to provide a high architectural quality across the development.

#### *Apartment Blocks*

6.5.12 These plots are the tallest blocks within the development and comprise podium gardens (seven and five storeys i.e. Blocks C, D and E), with car parking at ground level below. The choice of materials is generally considered acceptable although final details would be secured by way of condition. The podium gardens between the seven and five to seven storey blocks are approximately 18m and 13m wide respectively and therefore offer a visual break from the development from the park. The entrance to the cores would be at podium level which would be highlighted in the same brick used for the entrances throughout the development. The top two levels of the highest blocks are to be finished in white matt GRC to reduce the visual impact when viewed from West Harrow Park. The remainder of the apartment blocks would comprise a mix of Brick Types 1, 2 and 3 (White colour, Buff colour and Brown colour bricks).

#### *Maisonettes*

6.5.13 Blocks G and F would be four storeys in height separated by a 13m central gap offering views towards the West Harrow Allotments. These are linear blocks which have entrances accessed from the Mews Court with their rear gardens facing the proposed pedestrian path and the village green. Both blocks generally take on a horse-shoe shape which appear as a linear frontage when viewed from the village green and with recesses fronting the Mews Court. The recessed balconies, cut away corners and choice of materials ensure that these blocks are architecturally interesting and would reduce the visual impact when viewed from the village green, particularly given their linear nature on that side. A special glazed brick is proposed to highlight the entrances and rusticated brickwork would be used at ground floor level. It is proposed that Brick type 2 (Buff colour Wienerberger) and Brick Type 3 (Brown colour BEA – Luna Storm) would be used. All balustrades would be vertical metal. Blocks A and B would also replicate the appearance of these blocks. The architectural intent and choice of materials is generally considered acceptable. Further details in respect of the servicing entrances would have been required had this application been otherwise considered acceptable.

#### *Mews Court – Houses*

6.5.14 The building layout along the Mews Court is generally linear and would run parallel with the boundary shared with the allotment site behind. The rear gardens of these properties are generally between 5 - 9m in depth with an additional 1.5m biodiversity buffer zone, although the roof gardens mean that the blocks would appear as part 2, part 3 storey which would ensure visual relief to the allotments and minimise the impact of overshadowing. The houses would be characterised with recessed front doors to celebrate and enhance the threshold, as well as turned bricks. The metalwork would match the maisonette blocks. Timber doors would highlight the garage space. Brick type 6 is proposed which would be red colour Michelmersh with white mortar. The architectural approach to these blocks is generally considered acceptable.

#### *Block J – Residential / Community Block*

6.5.15 Block J would be located in the north-west corner of the site, adjacent to The Ridgeway playing fields. This block is four storeys high and would incorporate car parking. To highlight the ground floor community use and entrance, Brick Type 4

(Green colour Istock Umbra or similar) is proposed, with larger windows at second floor level to differentiate between the residential and commercial floors. This block is arrow shaped with the point of the arrow directed towards the West Harrow Allotment site. A 12m separation distance between this block and the Mews Houses is proposed to offer further visual relief. The residential entrance would face onto the Mews Court and the green Istock would be reduced to mimic the residential entrances of the other blocks on the development. This use and choice of material is considered to reinforce legibility within the site and ensure consistency and continuity.

## Summary

- 6.5.16 The architectural intent of the development and choice of materials is generally considered to be acceptable. The mass has been manipulated to reinforce key connections on the site, giving regard to the wider context and carefully judged to signpost the central village green and be a visible marker along the primary route towards West Harrow Station. Had this application been otherwise deemed acceptable the conditions stated above would have been attached.

## Public Realm and Landscaping

- 6.5.17 It is intended to create a sub-neighbourhood character within the wider masterplan site to improve connectivity through the site and enhance the overall character and appearance, pattern of development and layout of the masterplan site. The proposal will establish the following main character areas that are imbedded within the masterplan (also shown in Image 4):
1. **Entrance Space** – This will be the main arrival point for vehicles, pedestrians and cyclists into the site and characterised by specimen existing and proposed trees with seating. The entrance street would provide visual through views towards the ‘Mews Court’ and towards the connection towards West Harrow Station.
  2. **Village Green** – This is centrally located between blocks A, B and G and would be a wide lawn style area framed with trees known as the ‘heart’ of the development as it would offer a multiple use amenity space. The space also offers an attractive and safe walking or cycle route towards West Harrow Station.
  3. **Play area** – This is located centrally between Blocks D, E and F and is a naturalistic area which also forms part of the village green, with a variety of play equipment and natural surveillance from the surrounding blocks.
  4. **Homezone Street and Parking** – This area is known as the ‘Mews Court’ replicating a residential street with surface level car parking.
  5. **Communal Podium Gardens** – These would be located between the higher level blocks C, D and E for residents and play area for toddlers. These would also offer a visual break from development when viewed from West Harrow Park as well as forming an attractive part of the development.
  6. **Pathway to West Harrow Station** – This path would be surrounded either side by the village green spaces and rear gardens of Blocks F and G with appropriate boundary treatments. A meadowland with orchard trees would mark the entrance into the site from West Harrow Station. The path would be accessible for both pedestrians and cyclists.



**Image 4: Character areas**

6.5.18 In terms of character, it is considered that the above sub-character areas would help to create a sense of place and legibility through the site and in context of the wider masterplan site. The new direct through route is considered to significantly improve safe and direct access to and from West Harrow Station for both future occupiers and nearby residents. Furthermore, the village green areas and podium gardens would encourage a sense of community and integration amongst the existing and new residents.

### **Landscaping**

6.5.19 The proposal includes a series of special landscape spaces located within a cohesive network of residential streets. The new village green would form a new civic space and links all the streets on the site and brings orientation to this area of the scheme.

6.5.20 The green pedestrian and cycle footpath linking the site and the wider area to West Harrow Underground Station has largely been dictated by the space required for the Thames Water sewer easement and the underground attenuation tank, rainwater infiltration areas and root barriers. Whilst not physically link, the village green proposes two distinct spaces characterised by a large lawn and play area. Whilst the landscape officer has noted this is not an ideal situation, given the constraints noted the provision of the large landscaped area which highlights the green link to the station is a welcome addition to the scheme.

6.5.21 Block J which serves the community and residential uses provides some greenery adjacent to the car park. Whilst trees are proposed in small raised beds in the car park, these are located over the Thames Water easement and therefore their

survival is of concern to the Council's Landscape Officer. This would require further review via condition had this application been acceptable.

- 6.5.22 It is noted that the areas in front of Blocks A to E are limited in greenery which does not visually soften the extent of development, however the village green areas would on balance provide mitigation from this. The areas around these blocks to the rear of the apartments, adjacent to the SINC / access road and railway line is narrow and is unlikely to flourish unless carefully managed and maintained which can be secured by condition.
- 6.5.23 To the rear of Block H a new 1.5m wide native hedge is proposed which would run along the north eastern boundary between the Mews Court gardens and allotments. The Landscape Officer considers this to have a potential to grow large, in width and height, whilst this is beneficial for visual screening of the development, this could impinge on the private amenity gardens for the residents of these houses and block. A maintenance plan is therefore required. It is acknowledged that the gardens at the rear of the houses and Block H are small and north facing, however the overall amount of amenity provision in close proximity to these properties are considered to mitigate against the lack of meaningful provision and the subtle transition to the allotments beyond enhance their siting.
- 6.5.24 As part of the updated drawings, the SUDs pond area originally proposed in the western edge of the village green has been replaced with a rainwater infiltration area, with a lawn and wildflower mix with low shrub bordering this. A rainwater attenuation tank has also been introduced in front of Block G and as such the vegetation proposed has been reorganised. This is generally acceptable subject to further detailed drawings which could have been secured by condition.
- 6.5.25 Each of the podiums would have a similar design principle with the layout adjusted to fit the size and geometry of various communal gardens. All podiums can be accessed from street level as well as through the communal cores. The landscape strategy does include gates to communal gardens, and these will be managed by the applicant so that they are open in the day and closed in the evenings. The podiums will include private terraces which would be enclosed by railings and landscape hedging to provide defensible space and privacy to those units. The soft landscaping strategy would include planted mounds to provide opportunity for tree planting and to add visual interest and play opportunities.
- 6.5.26 The site levels vary along the boundary of the site particularly adjacent to the SINC and railway lines. Minimal information has been provided in respect of these level changes; however, these can be conditioned, alongside information relating to boundary treatments, lighting and play strategies. The fruit trees and meadow planting to the north eastern site corner provides a small but rural element to the scheme, which appears to form a sensitive transition to the cycle and pedestrian path. This should be supported by a robust lighting strategy.
- 6.5.27 Streets are high quality spaces with parking sensitively incorporated - a range of methods to mitigate the impact of cars through landscape have been used successfully. Considerable care has also been taken in the design of front gardens so that they are both generous to the street and provide privacy for the residents.

Planting strategies and choice of materials are well judged, creating a characterful and vibrant public realm.

- 6.5.28 The DRP emphasised the importance of taking a holistic approach to the design, where landscape and architecture complement each other, and the scheme has responded well to this. The public realm is designed throughout to work for all ages and groups. The communal podium courtyards have the potential to be good spaces well used by the community. It is important that these are appropriately controlled to provide safety but also accessibility for residents, so that they do not become inaccessible and under-used. This is also crucial in supporting a child friendly city, allowing children and young people to move easily between blocks and visit neighbouring friends. A suitably worded condition is recommended to this effect.
- 6.5.29 Overall, the landscaping strategy proposed would integrate with the wider masterplan site and would provide a high-quality finish. The detailed landscaping strategy and detailed planting together with the maintenance and management plan could be secured by condition. A condition would have also been attached in relation to the details for the boundary treatments, site levels, lighting strategy and an appropriate condition relating to the gated access operation relating to the podium gardens as set out in the appraisal above. Conditions relating to maintenance and management of all landscaped areas would also be required.

### **Access**

- 6.5.30 The development benefits from an existing access point on The Ridgeway with a ghost right hand turn lane. The primary vehicular route would be from this point and would benefit from traffic calming measures proposed within the vehicular route. Vehicles would only have access to and from the Mews Street and the proposed road fronting Blocks A and B leading to the podium car parking within Block C. Secondary movements including for servicing, deliveries and emergency access would benefit from use of the wider shared surface area. This wider route has been tracked to ensure suitable access is provided to all cores of apartment blocks within the development. The only other surface level parking would be for the Mews Houses benefitting from integral garages and Blocks G and F which located along the southern side of the Mews Street. Furthermore, parking (6 spaces) for the community use is located north of the primary entrance. This arrangement is considered to be effectively minimise vehicle movement within the site.
- 6.5.31 Pedestrian and cycle routes are directed to the new pathway within the site, unless accessing the properties on the Mews Street. This path would connect to an existing public right of way on the south eastern corner which runs adjacent to the Railway line at a lower level. This would be the secondary point of access to the site for pedestrians and cyclists. It is noted there is a currently a gate which blocks this public access from being used, however the Council's Traffic and Highways Officer has stated that this gate is unlawful, and the installation of a kissing gate could resolve this issue. Furthermore, any renewal to the existing pathway would need to consider the safety of pedestrians and cyclists in light of existing vehicle movements required to serve the West Harrow Allotments. As the existing path is not formally a right of way and not recorded in a definitive map as

such, a DMMO application would be required via a legal process, part of this would be allow for this path to be used by different user groups. Maintenance of this path would depend on the adoption of the highway and would need further consideration depending on the finalised S278 agreement works. Indicative plans have been provided, however this would need further discussion via the legal process, should the application be approved.

- 6.5.32 Notwithstanding the above, the access arrangements and principle of pathway within site to connect to the existing path would be acceptable.

### **Refuse Storage**

- 6.5.33 The supporting Design and Access Statement (DAS) sets out the refuse arrangement for each plot. The plans show that each of the buildings would have its own dedicated refuse stores. The houses within the Mews Court would have individual refuse and recycling stores located within their garages and collected from the kerbside. Block H in between the houses would have external refuse stores also collected from the Mews Street. The maisonettes would have a communal bin store for the upper floor units whereas ground floor units, accessed via the street would have their own dedicated external bin stores. The apartment blocks would have dedicated ground floor refuse stores which can be accessed by the residents from the core via the lobby and by refuse collectors directly from the street. Additionally, Block J would have a dedicated store for the community use and a separate residential refuse store, appropriately located to accommodate servicing vehicles. All communal bin stores would be located in proximity of the road ensuring the dragging distance between the door of the store and the kerb line is less than 10m as required by the Council's Refuse Collection Code of Practice. The quantum of residual waste and recycling waste bins provided for each building would be in line with that stipulated in the Councils Refuse Collection Code of Practice, which requires a provision of 1 large bin per 8 flats. Separate refuse storage provision will be made for all commercial premise which would be located within the demise of those units.
- 6.5.34 The waste officer has reviewed the information and considers the design to be sufficient for the purposes of servicing all of parts of the site.

### **External Lighting**

- 6.5.35 In terms of external lighting, the applicant has not provided proposal or plans in respect of this element. A full detailed lighting strategy which includes lighting for all external areas in the public realm, podium courtyard gardens and private gardens should be provided. This should also consider impact on biodiversity of the lighting from the building and night-time lighting concentrated in appropriate areas ensuring upward lighting is minimised; and light pollution is controlled and minimised. The final equipment details and detailed external lighting designed would need to be secured by condition.

### **Fire Strategy**

- 6.5.36 A Fire Strategy was submitted as part of the submission, however at the time of submission the London Plan 2021 had not yet been adopted and therefore it did

not follow the guidance issued and on review by the Council's Building Control officer was found to be deficient in this regard. This was also reiterated within the Stage 1 GLA response. An updated Fire Strategy was subsequently submitted which outline core fire safety components to be incorporated during the design and construction phases. The strategy would include cores that are designed to be fire fighting cores with the provision of firefighting lifts and provision of dry risers, minimum stair width of 1100mm, main entrances lobbies ventilated and sprinkler system for residential units. Emergency vehicle access routes and fire hydrants have been mapped out. The Mayor under his Stage 1 response has requested that a Fire Statement produced by a third party suitably qualified assessor should be secured in accordance with policy D12 of The London Plan to ensure that the development proposals achieve the highest standard of fire safety.

6.5.37 Following the GLA's latest comments in April 2021 and LPA Building Control Officer, an updated Fire Strategy was produced and submitted to the LPA in July 2021. The Strategy appears to confirm that in complying with the policy, no significant design changes to the scheme would be necessary, to address concerns raised by the GLA. As the updated report has not been reviewed by the GLA or the Council's Building Control Officer (due to time constraints), given that the Fire Strategy has been updated in accordance with the latest consultee comments, a condition would have been recommended accordingly to ensure full compliance with Policy D12 of the London Plan had this application otherwise been acceptable.

### **Conclusion**

6.5.38 In conclusion, the proposed development, subject to the imposition of appropriate conditions would achieve a high-quality form of development which would be further enhanced by the landscaped strategy which will knit together with the wider masterplan. It is considered that the proposals would meet the high quality design and landscape aspirations in accordance with the policies listed under paragraph 6.5.1 of this appraisal.

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

6.6.1 The relevant policies are:

- National Planning Policy Framework: Chapter 8
- London Plan: D5, D6 and D7
- Harrow Core Strategy (2012): CS1K
- Harrow Development Management Local Policies: DM1, DM2, DM27 and DM28
- Mayor of London Housing Supplementary Planning Guidance (2016)
- Mayor of London Achieving an Inclusive Environment Supplementary Planning Guidance (2014)

### **Residential Quality of Future Development**

#### *Entrances and Shared Circulation*

6.6.2 The Mayor's Housing SPG calls for entrances to be visible from the public realm

and clearly defined. The residential entrances to the buildings would face the new internal streets and as articulated in Section 6.5 of this appraisal there are a number of design features which further help to emphasise these. They would be visible from and would help to activate the new public realm within the proposed development.

- 6.6.3 The entrance lobbies to the proposed residential flats would be generously proportioned and in accordance with the Mayors Housing SPG, each of the larger blocks (4+ storeys) would be served by at least one lift and therefore would no more than eight residential units per floor serving a core. The SPG also encourages communal corridors to receive natural light and ventilation where possible. The larger blocks contain corridors which are centrally located and therefore, do not allow for windows to serve corridors, however it is noted that these are not excessively long and are served by a good size lobby for each floor. Whilst clearly not ideal, this is not considered to warrant refusal. Furthermore, the remainder of the medium-low rise blocks do not include corridors as these are accessed directly from ground level or by closely located cores.

#### *Internal Space Standards*

- 6.6.4 The minimum space standards are set out at Table 3.1 of the London Plan (2016) and are reproduced within the Mayor's Housing SPG. The updated plot by plot schedule details the proposed unit typologies which would be provided within all units within the development. 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 SPG also seeks adequate space and services to work from home. An indicative furniture layout is set out on the application drawings and this demonstrates that all of the flats would have space for a table. As such, each flat would have space flexible for dining and home study/work activities.
- 6.6.5 The SPG requires built in storage space to be provided in all new homes. The proposal is shown to provide an adequate level of storage space for each of the units. To ensure compliance with this standard, it is considered necessary to secure this as a condition of any planning permission. In addition to internal storage space for each unit, within buildings C, D and F the ground floor would offer additional storage space located within the servicing and car park area for future residents.

#### *Aspect*

- 6.6.6 The SPG seeks to avoid single aspect dwellings where: the dwelling is north facing (defined as being within 45 degrees of north); the dwelling would be exposed to harmful levels of external noise; or the dwelling would contain three or more bedrooms. The definition of a dual aspect dwelling is one with openable windows on two external walls, which may be opposite (i.e. front & back) or around a corner (i.e. front and side) and the SPG calls for developments to maximise the provision of dual aspect dwellings.

6.6.7 The applicant has sought to exploit opportunities where possible to create dual aspect dwellings. Almost all units would be dual or triple aspect and the proposal would have no north-facing single aspect units, thereby each unit would receive adequate levels of natural daylight. The majority of the units would experience adequate outlook due to the orientation of the buildings and the nature of the immediate surrounding context. However, of concern is Block A, which is located in close proximity to the SINC, located a maximum 2m distance away from habitable bedrooms. At its narrowest point the building is located less than 1m away from the embankment. It is likely that these rooms would experience inadequate outlook given the upward slope of the embankment and the existing vegetation. Arguably this overall standard of accommodation within the units would be sufficient given their dual aspect nature, however the insufficiency of the Daylight / Sunlight Report, discussed below it is not considered to outweigh the harm that would be caused to these habitable rooms, particularly as Block A is proposed for Affordable Housing units, which are also expected to receive a high standard of internal accommodation.

#### *Daylight and Sunlight*

- 6.6.8 The SPG (2016) states that “All homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen and dining spaces should preferably receive direct sunlight” (standard 32). Supporting paragraph 1.3.45 outlines that “An appropriate degree of flexibility needs to be used when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties as well as within new developments themselves. Guidelines should be applied sensitively to higher development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should consider local circumstances; the need to optimise housing capacity; and the scope for the character and form of an area to change over time.” Local Plan Policy DM1 includes among its amenity considerations the adequacy of light and outlook within buildings (habitable rooms and kitchens).
- 6.6.9 This application is supported with a daylight and sunlight report, which is based on the Building Research Establishment’s (BRE) ‘Site Layout Planning for Daylight and Sunlight: A Good Practice Guide’. The assessment considers the quality of sunlight and daylight to the new residential dwellings. The methodology adopted is considered to be appropriate.
- 6.6.10 For the purposes of measuring the performance of habitable rooms within the proposed development, the assessment uses the Average Daylight Factor. This method measures how much sky can be seen from the window and converts the results into a percentage of annual probable sunlight hours received. The BRE guidelines recommend that ADF values of 1% should be achieved in bedrooms, 1.5% in living rooms and 2 % in kitchens. In assessing daylight to combined living/ kitchen/ dining rooms, where kitchen areas are located to the rear proportion of such rooms and would receive lower levels of daylight, these have been omitted from the calculations and the assessment is based on the habitable living area only. Hence an ADF target of 1.5% has been adopted.

- 6.6.11 The results show that overall daylight amenity within the proposed accommodation will be very good. 128 out of the 132 rooms tested would achieve their respect ADF target. This achieves a compliance rate of 97%, which is very good result for this scale of development. Even if the 2% ADF target was applied, the compliance rate would be still very good. Where there are rooms that are not able to meet the strict application of the BRE Guidelines, this is in all instances a result of the provision of projecting balconies which limit the view of unobstructed sky. There are however some limitations in the study, namely that only a selection of habitable rooms (in most areas) have been considered.
- 6.6.12 The 2 rooms which do not meet the recommended ADF levels are bedrooms, however the study states that these are recognised by the BRE as having less of expectation for natural daylight when compared to a living room. Furthermore, the other 2 which do not meet the recommended levels are dual-functionality rooms containing a kitchen-dining and living-kitchen-dining area. Given the large depth of these rooms, the dining areas have been located closer to the windows as these require natural light and outlook unlike kitchen areas which commonly use artificial lighting.
- 6.6.13 In terms of sunlight, the VSC methodology demonstrates that 100% of windows would meet the BRE Guidance for Annual Probable Sunlight Hours (APSH). This is commensurate with the permissible 20% from former value. In terms of sunlight, the sunlight assessment results indicate that only 9 out of the 39 amenity spaces tested would meet the strict application of the BRE Guidelines, although all but 1 space would far exceed the BRE's suggested target. The 9 amenity spaces relate mainly to the communal areas, albeit the majority of the smaller village green area would have less than 2 hours of direct sunlight each day. However, it is noted that this area of open space most affected by severely reduced sunlight is designated as a play space for 0-10 years and features significant planting as part of its landscape strategy. There is concern that such planting would be unviable as a result of the loss of sunlight caused by overshadowing, however the impact on the use of play space from reduced sunlight is not considered to compromise the usability of this space for those purposes. The remainder of the areas which fail to endure more than 2 hours of sunlight each day include small private gardens of Blocks A, B, F, G and H as well as the Mews Houses. It is considered however, that the availability of the larger communal areas for residents as well as generally good outlook would on balance outweigh this harm.
- 6.6.14 Notwithstanding the above, the Council have reviewed the Daylight / Sunlight Report and do not consider there to be sufficient information given that the impact from existing tree coverage, particularly from within the adjacent SINC and to the south of the site boundary on the proposed development and internal spaces has not been factored into the assessment. This is relevant for Blocks C, D and E which are located nearest to the SINC and tree strip between the site and railway line. The urban design officer notes concern regarding the impact of the development on the south-western elevations to Blocks A and B and the southern elevation to blocks C, D and E. This would mostly be notable for lower storeys (ground to 3<sup>rd</sup> floor) and particularly for ground floor units in these blocks, although it is acknowledged that blocks C, D and E feature a podium at ground floor level which largely removes habitable space from ground level. The updated section drawings indicate a minimum distance of 3m between the development and

embankment. However, the impact of any overshadowing on these elevations and on the private internal spaces they relate to has not been included. Of greater concern is the proximity of Block A to the SINC which is located a maximum of 2m away. This would result in the majority of rear facing bedrooms which would potentially be in shadow or experience poor outlook. Similarly, whilst it is likely that the impact to Block B would be less than that of Block A, failure to include the impact of existing trees particularly given that these embankments increase in height is not considered acceptable.

- 6.6.15 In conclusion, Officers consider that whilst clearly it is desirable for a new development to achieve 100% compliance with the recommendations of the BRE guidelines, it is inevitable that a site of the proposed density will require consideration of some compromise between daylight/sunlight, the provision of highly valued residential amenity space (balconies) and other planning considerations that may influence the site layout and orientation of buildings. It should also be emphasised here that the recommended BRE guidelines for daylight and sunlight – whilst a valuable tool for measuring the degree of daylight and sunlight that would be achieved – do not form a part of the adopted development plan. Rather, Local Plan Policy DM1 requires a high standard of amenity and undertakes to have regard to a range of amenity considerations which includes, but is not limited to, the adequacy of light and outlook. Thus, whilst a small proportion of the tested rooms/windows would not achieve the recommended BRE standards, across the development as a whole, it is demonstrated that the majority would.
- 6.6.16 Notwithstanding the above, the Daylight / Sunlight Report fails to adequately assess the impact of the adjacent SINC and vegetation on the Railway embankment on the habitable rooms of the nearest residential blocks and associate amenity spaces serving these units and therefore the information supplied is considered to be insufficient and consequently would give rise to conditions prejudicial to the amenities of the future occupiers of the those units. Furthermore, such impacts may result in post-development pressure for their removal of trees / vegetation as a result if these impacts, which would fail to safeguard the visual screening of the site currently experienced.

#### *Privacy*

- 6.6.17 The SPG calls for habitable rooms within dwellings to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces. Paragraph 2.3.36 of the SPG refers to yardstick separation distances of 18-21 metres between facing habitable room windows.
- 6.6.18 As a high-density scheme there would inevitably be some overlooking relationships between homes within the development. These occur in elevations fronting the podium levels, facing the streets and where buildings have gaps in the buildings to provide podium and yard access. These elevations would, of course, all contain habitable room windows and balconies, meaning that there would be a high level of visibility between homes on the same level (i.e. looking directly across) and perceptions of visibility to/from homes on other levels within the development.

- 6.6.19 Broadly Blocks C and D follow the yardstick approach and maintain separation distances of more than 18m. However, given the reduction in height between blocks D and E the separation distances are much less (13m). Notwithstanding this, in general the blocks maintain a distance of between 13 – 18m and the given the orientation of the blocks apart of the exception of apartment blocks noted above there is minimal potential for direct overlooking.
- 6.6.20 A number of the balconies and private gardens throughout the development would be sited adjacent to each other, or adjacent to neighbouring windows. However, as noted above the level of overlooking between the balconies would be an acceptable condition in regard to the high-density scheme such as this. As noted under the character and appearance section of this appraisal, the ground floor gardens and those units fronting the podium level would maintain sufficient defensible zones from the public realm to ensure the privacy of the occupiers of these units.
- 6.6.21 On balance, having regard to the high density nature of the proposal, which is consistent with the need to make effective use of this brownfield site and recognising that those choosing to live in a high density development are likely to have different expectations about privacy, it is considered that the relationships between residential buildings would secure a standard of privacy that would be commensurately high for the vast majority of future occupiers. Notwithstanding this, it is also considered that the choice in housing typology and large areas of amenity spaces in between the blocks mean that the availability or properties incorporating larger separation distances is acceptable.

#### *Communal and Public Open Space*

- 6.6.22 The proposal would make provision for communal open space through the provision of podium gardens for each of the larger apartment blocks. These spaces have been well designed to allow semi-public access from street level through the creation of steps up to the podium level. This will help create a sense of community for the future residents by permitting residents from different blocks to interact with each other. In addition to this, residents will have access to the generous green link and village green which is to be provided on the wider masterplan site. Residents would also have access to other pocket of green spaces created through the provision of the new arrival square and landscaped areas. Overall, it is considered that the different forms of communal space being offered would be a benefit of the scheme and improving the environment of these properties. The space would benefit from high levels of natural surveillance and would be of dimensions/configuration that would lend itself to domestic recreational activities.

#### *Play Space*

- 6.6.23 Policy S4 of the Mayor's London Plan seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sqm. per child. The proposed development will make provision for play space for children falling within the age group of 0-5 years which would be provided as door stop play within each of the podium gardens. Play space for children falling within the age group of 5-15 years

would be provided in form of a lawn area play located within the village green areas, this would include defensible planting and equipment for children. It should also be noted that the site is located close to West Harrow Park whereby there are provision of sports facilities and recreational opportunities for 15-17-year olds. Overall, the total play space provided on site will be 1,243 sqm. The GLA's child yield place space calculator generates a yield of 89 children and would therefore require a place space provision of 887.8 sqm based on a provision of 10sqm per child.

- 6.6.24 The Council's Planning Obligations SPD, is informed by Harrow's PPG 17 Study and specifies that a standard needs to be set that is both aspirational and also achievable. For this reason, the quantity standard for children's play space within Harrow has been set at 4sqm of dedicated play space per child. When assessed against the Council's own benchmark, the development would provide more than the required dedicated space equating to 354.8sqm. Therefore, the LPA consider the quantum of play space provided is acceptable for the reasons set out above.

#### *Access*

- 6.6.25 Policy D7 of The London Plan relating to Accessible Housing, requires at least 10% of new housing to meeting building regulations M4 (3) – 'wheelchair user dwellings. Furthermore, it requires all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings. The proposals would provide 10% of residential units as wheelchair adaptable units and as such the proposals would be complaint with the required building regulations. Furthermore, the Design and Access Statement confirms that all dwellings are designed to be fully compliant with Part M4(2) compliant. A condition would have been necessary to ensure compliance with the regulations.

#### *Private open space*

- 6.6.26 The SPG requires a minimum of 5sqm per 1-2 person dwelling and an extra 1sqm for each additional occupant. In the case of the apartment blocks, these units would have a private balcony space which would meet or exceed the required standard recommended in the SPG. Furthermore, the maisonettes and houses all benefit from either private gardens or private balconies. In addition, a number of external amenity space would be provided on site, by way of access to podium gardens and the park and the village green, it is therefore considered that there is ample choice of high-quality amenity spaces within the development.

#### *Noise*

- 6.6.27 The SPG seeks to limit the transmission of noise between flats, and from lifts/communal spaces to noise sensitive rooms, through careful attention to the layout of dwellings and the location of lifts.
- 6.6.28 Due to the Block configuration and the number of single aspect units, a number of flats would have bedrooms sited adjacent to living/ kitchen areas of adjoining flats. In the case of the cores to the individual buildings a number of habitable rooms would be sited adjacent to the lift shaft. Whilst this is not ideal, in most cases due

to site constraints, this is unavoidable. However, having regard to the fact the development would be a new build and therefore would be required to ensure that sufficient noise insulation is provided to meet Building Regulations. When considered against the requirement for thermal installation also, it is considered that sufficient level of noise mitigation would be achieved to provide a good level of accommodation for future occupiers.

- 6.6.29 Policy D13 of The London Plan states that the Agent of Change principle places the responsibility for mitigating impacts from existing noise (and other nuisance-generating activities or uses) on the proposed new noise-sensitive development. Furthermore, it states that development proposals: should manage noise and other potential nuisances by ensuring good design mitigates and minimises existing and potential nuisances; explore mitigation measures early in the design stage, with necessary and appropriate provisions, including ongoing and future management of mitigation measures secured through planning obligations; and separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, and insulation and other acoustic design measures. The site is located in close proximity to the Railway line to the south and there may be some noise arising from traffic along The Ridgeway.
- 6.6.30 A Noise Impact assessment was submitted in support of the application. For the external amenity noise levels. This assessment sets out the pre-development noise and vibration levels as a baseline to inform the assessment. The assessment was undertaken to demonstrate likely noise levels across the site and at development facades. The assessment considered both predicated ambient noise (daytime and night time). Mitigation strategy to include façade treatment in the form of glazing and ventilator specifications has been recommended to ensure the design target thresholds are met. Furthermore, noise predictions for external communal areas are considered to be below the upper noise threshold criteria (55 dB) and as such no further mitigation is required. Furthermore, impact from plant noise is not considered to be of high magnitude impact.
- 6.6.31 With respect to plant vibration, the likely impacts from train movements at closest building blocks during the daytime and nighttime periods indicate a low probability of adverse impact based on the criteria set out in BS 6472.
- 6.6.32 In terms of ventilation it is considered that predicted façade noise levels would not be exceeded by more than 10dB should occupants of Blocks F, G and House Types A and B choose to open their windows, to control overheating. Openable windows are therefore acceptable at these locations. However, the aforementioned thresholds are exceeded within Blocks A, B, C, D, E, H and J. It is therefore, recommended that supplementary ventilation measures would be required to achieve the necessary thermal comfort criteria. The resultant cumulative noise levels (external break-in emissions) should be controlled to ensure that the acoustic criteria are achieved. The Environmental Health Officer has reviewed the report and considers a condition to secure all the outlined mitigation measures within the development would be necessary.
- 6.6.33 The Environmental Health Officer has noted that the proposed community use has not been included within the assessment of the report given that the end user

is yet to be confirmed. As such, a full noise strategy would have been requested by way of condition once the details of this facility area confirmed as well as operation hours. It is noted that an assessment of the impact during the construction phase of the development has not been included and as such had this application been otherwise considered acceptable it would have been necessary to include an appropriate Construction Environment Management Plan (CEMP).

- 6.6.34 Subject to ensuring that the recommendations set out in the applicants Noise and Vibration Assessment are undertaken with respect to the building fabric design as well as the other noise appropriate conditions mentioned above, it is considered that the proposed development would not give rise to any detrimental impact upon the future development. In this regard the proposal is considered to be acceptable in respect of draft policy D13 of the London Plan.

### **Conclusion**

- 6.6.35 In conclusion, based on the above considerations, and the imposition of appropriate conditions, it is considered that the development would generally achieve a high standard of quality of accommodation for future occupiers in line with the guidance and policies noted under paragraph 6.7.1 above. Notwithstanding this, the insufficiency of the daylight / sunlight report and the impact to primarily Block A but also to Blocks B, C, D and E (particularly the lower levels) arising from the close proximity of the raised railway and SINC embankments to the rear facing habitable rooms would result in poor outlook and potentially overshadowing to the detriment of these occupiers and is not considered acceptable.

### **Impact on surrounding residential properties**

- 6.6.36 Residential properties nearest to the site include 94 – 110 Fernbrook Drive (even numbers). All other residential properties are separated by distances of approximately 80m+, which are not considered to be affected in terms of daylight / sunlight as a result of the development. An analysis of sunlight and daylight infiltration resulting from the development was assessed and therefore it was not considered necessary to include properties 247-263 The Ridgeway which are in closer proximity to the site given that these are further away.
- 6.6.37 The results within the Daylight / Sunlight report indicate that full BRE compliance in terms of the daylight test, the Vertical Sky Component (VSC) and No Sky Line (NSL) tests have been achieved with respect to the impact on the properties identified above. The sunlight test was applied to some of the nearest potentially affected properties: 94, 96 and 108 Fernbrook and the results also demonstrated compliance with the BRE's permissible 20% from former value result. As such, the impact of the proposed development with respect to sunlight and daylight would be acceptable.
- 6.6.38 Concerns were raised during the consultation with respect to impact and overshadowing on the allotment sites adjacent to the northern boundary. It has been noted that trees were removed along the northern boundary of the site in December 2020. The removal of these is subject of enforcement action by the

Council. Notwithstanding this, it is considered that the proposed biodiversity buffer zone of 1.5m and set back of the building line of the Mews Houses and Block H would ensure that there would not be an overbearing impact on the allotments. Furthermore, the daylight and sunlight report indicate that over 95% of the West Harrow Allotments would experience more than 2 hours of direct sunlight as a result if the proposed development.

#### *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. The existing surface car park and single storey buildings provide an unobstructed view in the outlook of the dwellinghouses and users of the public park and allotments 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 site benefits from being located at a lower level than The Ridgeway towards its southern end. As a result, the site is not highly visible from surrounding areas on that side. Whilst the site's surroundings are largely suburban in character and occupied by lower rise buildings, there are some sites containing larger scale development, including Apple Grove located west of the site, which rise up to seven storeys. The site itself is also self-contained much like that of Apple Grove and given the distribution of massing across the site it is considered to respond sensitively to the different contexts which surround which further limits its visual impact.
- 6.6.41 The tallest elements would be located in the southern corner of the site where the adjacent section of The Ridgeway is at a higher level than the site, and the density of trees and other vegetation would largely screen the proposed development. Visibility would be partial in most cases and largely limited to short to medium distances from the site. The longer distances which offer wide ranging view such as Old Redding would see the development provide a minor addition to the townscape which would be consistent with the overall character of such views.
- 6.6.42 It is noted that the development would be seen most prominently from the open space at the West Harrow Recreation Ground to the south and also from the West Harrow Allotments to the north. The applicants have provided views from both sides and whilst the development would be highly prominent, it is considered that the separation distances, architectural merits and sensitive distribution of mass within the development site have ensured that the scheme would remain compatible in scale with its surroundings. Furthermore, the opportunity for development at this site would improve connectivity with the wider area and offer safety and improved accessibility to the wider community as well as future

occupiers. From the wider residential streets, the proposed development is considered to appear as a distinct background element in the townscape.

- 6.6.43 In terms of privacy and overlooking impacts, it is noted that the Mayor's SPG refers to separation distances of 18-21 metres between facing elevations with habitable rooms as being 'useful yardsticks' for visual privacy. The separation distances would therefore be sufficient to mitigate against any intervisibility between the proposed residential buildings and nearest dwellings. Whilst recognising that the adjacent occupiers would experience a visual change, taken together with the separation distances described above and having regard to the need to make effective use of this brownfield site, officers consider that the resulting visual and privacy impacts would be acceptable.

### **Conclusion**

- 6.6.44 In conclusion, the retained daylight levels to each neighbouring property will be reasonable for an urban location, as well as the acceptable visual impact resulting from the architecture and distribution of mass is considered to ensure that the proposed development would not result in significant harm to the nearby uses or residential properties.

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

- 6.7.1 The relevant policies are:  
National Planning Policy Framework: Chapter 9  
London Plan: H15, T2, T4, T6, T6.1, T6.3 and T6.5  
Harrow Core Strategy (2012): CS1R  
Harrow Development Management Local Policies: DM42, DM43 and DM44

### **Transport Impact**

- 6.7.2 This location has a public transport accessibility level (PTAL) of 1B which is considered to be poor. There is a distinct lack of easy access to public transport and convenience amenities within close proximity to the site. The nearest bus stop is approximately 350m from the site access however, for basic amenities both walking and cycling is currently not easily accessible or attractive. This area is characterised mainly by family houses and low-level maisonette type flats. There is a lot of off-street parking and Census data shows fairly high car ownership levels (although this is not unusual for Harrow).

### **Access**

- 6.7.3 Two key access points into and out of the site are proposed. Access for both vehicles and pedestrians will remain as existing from The Ridgeway which is considered acceptable. A second route is proposed to the eastern corner of the site which be confined to pedestrians and cyclists providing a direct route to West Harrow Underground Station with a view to increase the overall PTAL of the site. Following comments from highways officers the width of this path has increased to 2m.

### *Active Travel Zones (ATZ)*

- 6.7.4 The pedestrian environment surrounding the application is not considered to be an attractive mode of transport for users. There is a footway on the north-east side of the railway bridge but no facilities on the south-west side. The footway is quite narrow and sometimes overgrown shrubbery further reduces the width. The submitted Transport Assessment includes automatic traffic count data of vehicle flows and speeds which show the 85th percentile speeds as 33mph (northwest bound) and 35mph (southeast bound). The narrow footway and vehicle speeds create an unattractive environment for walking.
- 6.7.5 The Transport Assessment submitted follows the recently published guidance on adopting a Healthy Streets approach, which is welcomed. It is accepted that based on the multi-modal trip generation the additional trips generated by the scheme are unlikely to have an adverse impact upon the strategic transport network. The applicant has submitted an audit of key active travel routes in an active travel zone assessment (ATZ) from the application site to local destinations. The ATZ assessment reviews 5 key routes to destinations including the local school, GP surgery and West Harrow Underground Station. Within the GLA Stage 1 report, these destinations and routes are considered appropriate.
- 6.7.6 The ATZ assessment refers to various issues on key destination routes; the bridge over the railway line is in the immediate vicinity of the site and essential for access to the nearest shops at Shaftesbury Circle. The highways officers have stated that given the intention to provide a car-lite scheme, walking and cycling provision including facilities to enable this activity need to be of good quality to encourage residents to choose these options over taking a car. The nearest pedestrian crossing facility to the north-west of the site is approximately 190m from the site entrance. The application includes plans to improve pedestrian and cycle access to West Harrow Station and therefore the highways authority encourage a new crossing so that The Ridgeway can be crossed just before the footway ends on the south-west side to complete the connection to the west. The highways authority notes that these measures are integral for the success of a car lite development, as proposed as low car parking provision alone will not necessarily result in low car ownership.

*Proposed link to West Harrow Station*

- 6.7.7 The proposal seeks to provide a more direct link to West Harrow Station which is welcomed. However, the quality of the route would need to be such that it would become a realistic option for regular use. The width of this road has been increased to 2m and good quality lighting, signage and surfacing would be secured by way of condition. Officers have visited the existing link and noted the following issues:

;

- This is an existing public right of way for pedestrians established through 20 years of use, however, there is an evident conflict with vehicles using the path for access to the allotments; vehicles should not be permitted on a footpath used by pedestrians which is likely to be a problem for users of the allotment;

- The end of the right of way by the station has gates which can be locked; this obstructs the right of way and legally there must be no physical obstruction of a right of way at any time;
- In order to create a cycle path some land would need to be designated as highway along its length in order to provide suitable widths for either a segregated or shared footpath and cycle way. A separate lane would also be required for vehicles.

6.7.8 Notwithstanding this, as noted in section 6.5 options for improvements to part of the existing pathway are shown within the updated Transport Technical note, which show the replacement of the Harrow and Leaf hut and construction of bollards to prevent vehicles entering the improved part of the path. In order to improve the remainder of the path further legal discussions would need to be had with the Council's Estate Team to formalize the public right of way and contributions sought to maintain and secure safe public access to the station. The details and legalities would have been discussed further prior to any grant of planning permission to ensure the most suitable course of action.

### **Car Parking**

6.7.9 The proposed level of car parking at 0.4 spaces per dwelling meets the requirements of the London Plan and Development Management Policy DM42 in relation to reducing car use however, this level of provision is low for a development in an area where public transport access is considered to be moderate at best. It is understood that the intention is to provide new housing that would appeal to people who do not rely on cars however, this is easier to achieve where there is convenient and easy access to the services that are likely to be needed on a daily basis. It is accepted that in order to change habits, new approaches are required, and this is welcomed however, without substantial improvements to walking and cycling facilities, long term change is difficult to achieve. The possibility of overspill parking may occur if insufficient parking space is provided.

6.7.10 The Transport Assessment reviews car ownership levels by analyzing various sources of data and parking surveys have been undertaken to determine the existing demand for on-street parking and available capacity. The parking surveys appear to indicate that there is a lot of available on-street capacity which could accommodate visitor and overspill parking and car ownership levels are high. It is accepted that a new development does not mean that the same patterns of car ownership levels would occur, but it is an indication of how people live in an area. Unless there are facilities in place to ensure that walking, cycling and public transport are the primary modes of transport for people, the new residents could follow similar patterns of behaviour as those already living in the surrounding area, particularly if there is plenty of on-street capacity as the surveys seem to indicate.

6.7.11 In order to overcome the potential for overspill parking in short term and to ensure success of the car lite scheme put forward, the applicants have suggested a contribution towards investigating the need for a controlled parking zone in the vicinity, given the implementation of these have proved successful in sustainable areas of the borough. At present there does not seem to be a problem with

parking in the local area therefore, a review would need to take place following occupation of the development which would require an initial contribution of £10,000; and if this investigation showed that parking controls are required, a further contribution to fund the implementation would be required. This could be captured through the Section 106 contribution. Further measures which have been put forward by the applicant, but which would need to be explored further as to their suitability and deliverability during section 106 discussions, include:

- New waiting restrictions to prevent kerb side parking and maintain visibility on The Ridgeway, opposite Nos. 237-243 The Ridgeway;
- Proposed pedestrian crossing location to avoid existing driveways along the Ridgeway;
- Extension of kerb on northern side of The Ridgeway to match existing 7m wide carriageway to the south;
- Relocation of the existing Harrow and Leaf community hut to accommodate redesign and improvements to existing path to West Harrow Station;
- Bollards preventing vehicles using the dedicated cycle / pedestrian link.

### *Community Use*

- 6.7.12 In relation to the proposed community use, two standard and four disabled parking spaces are proposed which are to be unregulated. The Highways Authority have highlighted that where a medical centre has been proposed, the NHS providers have indicated that some car parking is required for staff use. It is appropriate to consider that at least some operational parking would be required for doctors on call or for other specialists (e.g. midwife, health visitor or counsellors) who are not permanently based at the site but do use cars to undertake their duties. Whilst four disabled bays will be of benefit, it is quite likely that the two standard bays would be occupied by staff if there is no management of the spaces meaning that patients would have to park outside of the site or would park in the residential spaces.
- 6.7.13 A health centre is one of a few uses that fall under the Class E (community use) category meaning that this facility could instead become a children's nursery or an art gallery for example. It is therefore essential that this site is considered on its merits for provision of any one of these actual uses in the event that a medical centre is not the preferred option. In a location where public transport access is moderate and the intention is to encourage sustainable travel, it creates a potential for conflict to have a use operating on site that could bring in a regular amount of vehicular traffic. Any commercial use that is not within a location with very good public transport access that has a low trip generation is usually sited in the vicinity of its users and does not rely on people travelling long distances to access the service. Further analysis is required to determine appropriate parking provision for this type of use class.
- 6.7.14 The site parking layout is generally acceptable as the anticipated flows and speeds are expected to be low.

### **Cycle Parking**

- 6.7.15 The proposed levels of cycle parking would comprise 356 long stay spaces for residents which is in excess of the 320 required by the London Plan Policy T5; 28 of these would be enlarged spaces. Further detail on the type of storage and access were submitted and considered to be acceptable.

### **Trip Generation**

- 6.7.16 The Transport Assessment compares the existing site and the proposed uses. The methods used follow industry standards and therefore are considered acceptable, although the Highways Authority did note some minor concerns. The modal splits applied based on census method of travel data have shown rail trips however, there is no rail station near to this site therefore the actual number of rail trips is likely to be low, particularly in relation to the D1 use as visitors are most likely to be local people. Clearly, residents may still use rail as the longest part of their journey to and from work which would explain why this mode features at all.
- 6.7.17 The analysis indicates a reduction in trips overall. The former Gospel Church would have hosted daily meetings but the size of the congregation is unknown and it is unclear how people travelled. TRICS gives a prediction of trips based on information obtained from existing active sites, therefore, it is possible that figures could be higher or lower but represents what could be generated by the site based on its use class rather than the specific operator. The data indicates that the site could generate about 1200 two-way trips (all modes) per day based on its current size and use as a place of worship.
- 6.7.18 The proposed community use is smaller than the existing place of worship however, as a GP surgery, it would still result in around 255 trips per day based on the TRICS analysis provided.
- 6.7.19 The assessment demonstrates that the proposal has a similar potential in terms of trip generation to the site in its existing form as a place of worship. However, it is acknowledged that concerns by local residents have been raised in relation to this notion, however, the Highways Authority acknowledge this may be misplaced perception given that the site has been out of use for a few years and prior to that, attendance at the church had been declining.

### **Car Park Design and Management Plan**

- 6.7.20 Concerns have been raised by residents regarding the accuracy of the parking surveys conducted give that Romney Close is indicated to have capacity for 8 parking spaces however, it has double yellow lines throughout meaning that there is no capacity. Furthermore, a review on Elm Close also indicates that there is far less capacity than the 19 spaces purported; although there are possibly 15 spaces. Although this is acknowledged, the Highways Authority consider that the document sufficiently details how the parking on site will be allocated and managed and consider these to be acceptable, and where relevant be secured via Section 106 agreement.

### **Construction Logistics Plan**

- 6.7.21 The outline plan provided is acceptable and a detailed plan should be secured by

pre-commencement condition. The plan must follow TfL guidance and should only be submitted when the contractor has been appointed and all required details are known.

### **Travel Plan**

6.7.22 The applicant has submitted a framework travel plan in support of the proposed development. This has been reviewed by the Council's Travel Planner and is considered insufficient. Notwithstanding this, an updated Travel Plan has been requested by the Travel Plan Officer for each phase of development which would have to be secured through the section 106 agreement along with any associated cost for the monitoring these travel plans. A Monitoring section with details of how the plan will be monitored should be included and provide for:

- Baseline Survey to be completed within 6 months of agreement (exact options to be secured by agreement) and following surveys to be conducted in year 1, 3 and 5 following the baseline survey.
- All financial costs associated with the Travel Plan are to be provided by the developer
- Travel Plan is to be secured by agreement
- Travel Plan Monitoring fees/bond to be secured with the latter only to be used in the event of the development not meeting targets in year 5

### **Car Club**

6.7.23 The applicant's TA sets out that there would be provision made for one car club space for the proposed development. This could be secured within the s.106 agreement if the scheme was considered acceptable. This is considered acceptable.

### **Deliveries and Servicing**

6.7.24 An outline Delivery and Servicing Plan has been provided in support of this application. This sets out that service vehicles will access the same routes as private cars and that majority of delivery and servicing activity will take place from the carriageway rather than formalised loading bays as to maximise footway provision and public realm. However, five loading bays will be provided across the proposed development in support of deliveries and waste collection. In line with policy H15 of the London Plan, the loading bays would also serve as a pick-up and drop-off facility suitable for mini-buses and ambulances.

6.7.25 The supporting refuse strategy has been reviewed by the LBH's Waste and Recycling Services Team and is based on the LBH's 'Code of Practice for storage and collection of refuse and materials for recycling in domestic properties' (2016). The requisite officer considers these to be acceptable.

6.7.26 Emergency Vehicles have been considered in the design of the proposed development. Fire tender vehicles are able to stop within 18m of each external riser inlet and clear routes have been provided to ensure unobstructed access in the event of an emergency.

6.7.27 The outline strategy is considered acceptable. A detailed delivery and servicing could be secured by condition had the application been considered otherwise acceptable.

### **Conclusion**

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

## **6.8 Development and Flood Risk**

6.8.1 The relevant policies are:

- National Planning Policy Framework: Chapter 14
- The London Plan: SI 12, SI 13, SI 15
- Harrow Core Strategy: CS1 U
- Harrow Development Management Local Policies: DM9, DM10 and DM12

### **Flood Risk**

6.8.2 The applicant submitted a Flood Risk Assessment (FRA) for this site. The Environment Agency's Flood Map for Planning indicates that the site in its entirety lies within Flood Zone 1, thus at a low risk of fluvial flooding (less than 1 in 1000), with no land at greater risk of flooding in the vicinity of the site. There are no surface watercourses in the vicinity of the site considered to pose any significant risk of flooding and the overall fluvial flood risk to the site is considered to be low.

6.8.3 The second source of flood risk to be considered in accordance with the NPPF (2019) is flooding from the sea. However, given the significant distance inland from sea it is not considered to be at any significant risk of flooding from the sea.

6.8.4 The third form of flood risk to be considered in respect of the NPPF is flooding from land. Intense rainfall, often of short duration, that is unable to soak into the ground or enter drainage systems can quickly run off land and result in local flooding. As the site is a brownfield site (i.e. given it is currently occupied by an existing building and car park), parts of the north western areas of the site are considered to be located in a Surface Water Flood Zone 3a which has 1 in 100 year surface water flood extent and also 3b which has a 1 in 30 year extent. However, the flood risk assessment notes that this designation would still lead to limited risk of flooding. The majority of the site however is at low risk of surface water flooding being within Flood Zone 1.

6.8.5 The Flood Risk Assessment states that given that that the only flood risk to the site comes from surface water flooding from the adjacent drain in extreme events (1 in 100 years), whereby the water level at the site would be 51.75m AOD (above ordnance datum), whilst the floor level of the proposed dwellings will be set 300mm above this water level at 52.05m AOD. Accordingly, an area of proposed access road and the public open space will be lowered and will provide

compensation for any loss in flood storage as a result of the proposed development. The overall compensatory flood storage to be provided at the development is 47.4m<sup>3</sup> thus with the loss being 32m<sup>3</sup>, the overall gain in compensatory flood storage at the site will be approximately 15.4m<sup>3</sup>. As such, all surface water from the proposed development would be adequately treated in line with requirements prior to discharge from the site. Foul discharge from the proposed development will be to the Thames Water foul sewer located on Fernbrook Drive as requested by Thames Water.

- 6.8.6 The FRA has been reviewed by the Council's Drainage Authority and they have stated that whilst there is no objection to the development further clarification with regards to the following should be provided:
- Finish Floor Level details are required. It should be minimum 300mm above flood level that is the lowest ground level within the floodplain. Expected depth of flooding according to the Council's maps is 900mm.
  - Compensatory Flood Storage section drawing with levels.
  - The applicant should submit drainage details in line with the Council's standard requirements attached.
  - The applicant should consult Thames Water developer services regarding capacity of their public sewers for receiving additional discharge from the proposed development. The Thames Water confirmation letter should be submitted.
  - Submission of a cross section of permeable paving construction with full details and their maintenance plan for our approval
  - Submission of a cross section of green roof construction with full details and their maintenance plan for our approval
- 6.8.7 Following the request for the above information, the applicant submitted further information and whilst the additional information was considered satisfactory by the Drainage Authority it is acknowledged that standard drainage condition would still apply which include compliance with surface water discharge to be restricted to 5 l/s/ha with revised storage calculations and submission of an updated Thames Water consent letter. On this basis, it is considered that subject to the Council's standard surface and foul water disposal conditions, permeable paving and sustainable drainage conditions as well as those stated above the application would improve the current flooding situation.

#### *Thames Water Sewer*

- 6.8.8 The site is bisected by a major sewer and is in a Critical Drainage Area. The GLA within their Stage 1 response required additional information about the performance of this sewer in a 100-year event and requested that the applicant propose appropriate mitigation measures where necessary. Thames Water had requested that an easement of between 3-6.5m for any new development is provided. The applicant provide a full assessment of the surface water/sewer/fluvial flood risk to the site during both a 1 in 100 year and 1 in 1000 year event, including details of the worst case water level likely to occur during a 1 in 100 year event. Details of the mitigation measures including ensuring that the finished floor levels of the new buildings are raised 300mm above flood level, ensuring all the building area is within a single 200mm level bracket and to

compensate for the loss in flood storage approximately 80m<sup>2</sup> of the proposed access and landscaped area currently located within the 1 in 100 year surface water flood extent will be lowered to a maximum level of 51.53 AOD from an average ground level of 51.63 AOD providing 8m<sup>3</sup> of compensatory flood storage. Additional grading down from existing levels either side will also create further compensatory storage volume, albeit this has not been included within the calculation.

*Impact of development on neighbouring West Harrow Allotment*

- 6.8.9 Concerns have been raised in relation to the loss of the existing ditch / swale on the north western corner of the site which would be replaced by car parking serving the proposed community use. The Council's Drainage Authority have stated that this ditch/swale serves the existing site as surface water storage to hold run-off from all impermeable areas before it discharges to the Thames Water surface water sewer. The proposed development will replace it with underground storage tanks of sufficient capacity to control discharge at 5 l/s/ha (greenfield run-off rate), consequently improving the current situation. Surface water run-off will be contained within the site and would therefore not affect the adjacent playing fields and allotments. Any loss of floodplain would also be fully compensated. It should also be acknowledged that the allotments and the neighbouring properties 249 - 263 are already at high risk of surface water flooding due to ground levels.
- 6.8.10 Comments received during the consultation also indicated an increase in flooding as a result of the removal of trees along the northern boundary of the site. The Council's Drainage Authority has stated that historically flooding issues often arise at the allotment site given that part of the site is within a floodplain, this situation is exacerbated by the flood flow route along the existing footpath. Notwithstanding this, at the time of the comments it was also noted that October 2020 experienced 49mm of rainfall which is the wettest since 1979. Furthermore, November, December and January 2020 were also exceptionally high with rainfall above UK average across London and many parts of the Borough continuing to report flooding. On this basis, the Drainage Authority has confirmed that the removal of the trees would have no significant contribution to the flooding of the allotment site. Additionally, the measures on site would improve the current situation with respect surface run-off and flood risk which would ensure that any wider impact would be minimised.
- 6.8.11 Policy DM9 of the DMP, and the SFRA require that appropriate flood mitigation should be incorporated for all major schemes. As such, Officers have requested that appropriate CFS is provided on site and the finished floor levels should be raised 300mm above the flood level including all mitigation measures within the FRA are incorporated.
- 6.8.12 Subject, to the applicant providing satisfactory CFS and the required finished floor levels, it is considered that the proposal would be satisfactorily safeguarded against any risk of flooding on site and thus satisfying the requirement of the policies set out under paragraph 6.8.1 above. In addition, an additional note has been submitted which addresses the Mayor's Stage 1 comments and will be confirmed at the Stage 2 referral and the Applicant should provide further commitment to include rainwater harvesting for water re-use and/or irrigation at

this stage to ensure that the scheme design can accommodate it as per the post-Stage 1 comments from the GLA.

### **Drainage Strategy**

- 6.8.13 Policy SI 13 requires a surface water drainage network to utilise sustainable urban drainage techniques, discharging surface water at greenfield runoff and managing surface water as close to source as possible in line with the drainage hierarchy set out under this policy. The applicant has submitted a Drainage Strategy (DS) which has been developed in accordance policy SI 13 of the London Plan.
- 6.8.14 The DS in line with the hierarchy will include storage water for later use by way of green roofs and rain gardens; will provide attenuation in open water features for gradual release; will attenuate by storing in tanks or sealed water feature for gradual release and discharge to surface water sewer at an agreed gradual release. The proposal will not include any infiltration techniques as the site is not suitable for this due to the underlying clay.
- 6.8.15 The proposal will include the following SUD's feature:
- Rainwater attenuation tank (in front of Block G);
  - Water infiltration area to serve as an additional CFS;
  - permeable paving;
  - Large areas of lawns and meadow, shrub and tree planting; and
  - green roofs.
- 6.8.16 As noted above, foul discharge from the proposed development will be to the Thames Water foul sewer located on Fernbrook Drive as requested by Thames Water. On this basis, it is considered that the proposed development would not result on any capacity impact upon the drainage infrastructure.
- 6.8.17 The Council's Drainage Authority has confirmed that the DS submitted is satisfactory. However further detailed drainage design in line with the Council's standard drainage requirements. On this basis, appropriate drainage conditions could be attached if the application were considered acceptable. The Mayor's Stage 1 response sets out that the proposed drainage strategy would generally satisfy the requirements of policy S1 13 of the draft London Plan and S1 15.

### **Conclusion**

- 6.8.18 In summary, subject to the applicant submitting acceptable CFS details, acceptable finished floor levels and the imposition of appropriate drainage conditions, it is considered that the proposal would be acceptable with regards to the policies listed under paragraph 6.10.1 above.

## **6.9 Trees, Ecology and Biodiversity**

- 6.9.1 The relevant policies are:
- National Planning Policy Framework: Chapter 15
  - London Plan: G6, G7
  - Harrow Development Management Local Policies: DM20, DM21, DM22

- 6.9.2 Following the initial comments from the Council's Biodiversity Officer the applicants submitted a revised Ecological Impact Assessment (EclA) (February 2021). The findings of the report state that the habitats within the site comprise semi-natural broad-leaved woodland, dense scrub, scattered trees, amenity grassland, ephemeral / short perennial and introduced shrub. The SINC located on the south-west boundary of the site currently supports foraging and commuting bats, badgers, small numbers of breeding birds, reptiles and European hedgehog.
- 6.9.3 With regards to the buildings on the site, no bats were recorded emerging from the buildings based on the bat survey carried out. Small numbers of common pipistrelle were recorded foraging on the site during the survey and a small population of slow worm was confirmed to be present, albeit these were confined to the north-east corner within an area of ephemeral habitats and garden waste. The EIA report finds that the proposed development could have the potential to result in adverse impact on these species groups through direct loss of suitable habitat, disturbance from increased external lighting and direct injury or death.
- 6.9.4 It should be noted that in December 2020, the applicant undertook the removal of a strip of trees along the northern boundary of the site. Whilst this was not deemed a criminal offence given that these were not statutorily protected, an enforcement investigation was opened. The enforcement case sought to ascertain whether the loss of these trees would represent a breach of planning condition 12 attached to planning permission WEST/321/97/FUL which stated:
- 'None of the existing trees on the site shall be lopped, topped, felled or uprooted without the prior written permission of the local planning authority. Any topping or lopping which is approved shall be carried out in accordance with British Standard 3998 (Tree Work).*
- REASON: The existing trees represent an important amenity feature which the local planning authority considers should be protected.'*
- 6.9.5 Under normal circumstances a breach of planning condition would warrant some form of litigation, in this case against the removal of trees. However, in pursuing any breach of condition, the LPA have had to consider the possibility of the current planning application being determined and approved at the same time. Should this be the case, the planning permission would override any prior enforcement breach. Enforcement action at this stage (should there be a breach) would therefore not result in any meaningful litigation and as such the enforcement investigation has been paused. In the event that the application is refused the Council will then assess the expediency and sustainability of further enforcement action. Notwithstanding this, the updated EclA report has included off-site financial contributions towards the implementation of relevant projects in Harrow's Biodiversity Action Plan to offset loss of the northern woodland strip bordering the site.
- 6.9.6 Policy G6 of the London Plan states that where harm to a SINC is unavoidable, and that the benefits of the development proposal clearly outweigh the impacts on biodiversity, the mitigation hierarchy should apply to minimise the development impacts. Whilst the development would provide a significant uplift of housing to the Borough, as per the current appraisal, it is clear that there are a number of

fundamental shortfalls in the application which would fail to provide an overriding benefit that would outweigh the impact of the development on the existing ecological network as detailed below. As such, the application has been assessed firstly on the basis of the sufficiency of the information supplied and secondly of how it meets the requirements of the mitigation hierarchy for completeness.

- 6.9.7 The Council's Biodiversity Officer has reviewed the updated EclA and notes that the proposed development would impact negatively on biodiversity and would not constitute sustainable development. The Biodiversity officer notes that the updated surveys were appropriate. The provided information recognises that there will be some impacts on the local ecological network/green corridor located adjacent to the site forms part however there is no assessment of this or identification of the measures to be taken in this regard. In spite of this, no evaluation of the SINC or the likely impacts on the local ecological network were provided and therefore the assessment itself is deficient. As well as not considering development impacts on the SINC, or seeking to avoid these, no surveys of the SINC area on which to base any pre and post development assessment was provided. Although under the mitigation hierarchy this may be justifiable under certain circumstances i.e. if there were overriding public benefits for permitting the scheme, this would be dependent on acceptable measures being proposed to offset the impacts and provide biodiversity gain.
- 6.9.8 Whilst the assessment does not fully evaluate the likely impacts on the SINC, the following measures were put forward by way of biodiversity enhancement:
- Removal of Japanese Knotweed on the site and also on the Council's land where it originated and is principally located (in the SINC).
  - Annual removal of rubbish from the SINC area;
  - New landscaped areas throughout the masterplan incorporating native species and appropriate planting for biodiversity improvements;
  - Provision of green roofs throughout the masterplan with appropriate planting and features to encourage biodiversity use;
  - Provision of 20 new integral bat roost units;
  - Provision of 20 new swift boxes;
  - Provision of log piles to enhance the site for reptiles;
  - The provision of off-site financial contributions to be made towards the implementation of relevant projects in Harrow's Biodiversity Action Plan.
- 6.9.9 The Biodiversity Officer notes that the onsite enhancements with respect to green roofs and new landscaping would not in themselves overcome the potential pre and post development harm to the SINC given that these would be required as wider policy requirements and would expect such biodiversity enhancement. This was acknowledged by the applicant and offsetting options, although deemed only to be used as a last resort in the London Plan (para. 8.6.6) were explored. However, EclA appears not to be in agreement with the landscaping proposals which suggested that the adjoining Council-owned SINC land could be enhanced to help offset some of the impacts within the development redline. In respect of the enhancement measures detailed above that whilst eradication of the knotweed would be welcomed, wherever it might have originated, any such arrangement should be agreed with the landowner in advance of proposing actions on land that is not in the applicant's control. The same extends to the removal of litter and the

position with regard to the proposed enhancement of the SINC which is shown on one of the submitted drawings but not included in the ecological report suggestions. Moreover, the semi-suggestion of these enhancements appears to have been made without there having been any survey of what is already in the SINC and there appears to have been no formal or even any informal approach to the Council (as LPA or landowner) in this regard.

- 6.9.10 It should be noted that in order to rectify the insufficiency in the information, the applicant submitted an assessment of pre and post development biodiversity value of the site in terms of a Biodiversity Metric Assessment which showed there to be a net loss in biodiversity on the site, equivalent to the loss of 1.35 net units, or 32.17%. This is primarily due to the loss of planted tree and scrub habitats on site and includes assessing the area of planting that was removed by the applicant in December 2020. Using Defra's July 2019 guidance, and their proposed tariff of between £9,000 - £15,000 per unit for offsite financial compensation in such instances. Applying the worst case scenario of £15,000 to the loss of 1.35, this would result in a contribution of £20,250 which the Applicant is prepared to commit to. Despite, the late submission of this information the Biodiversity Officer does not consider the Biodiversity Metric to account for the ongoing post-development impacts on the remaining and newly created habitat. This would need to be considered in the assessment of (a) the actual value of any mitigation and gain within the site and (b) impacts on the adjoining SINC and other areas.
- 6.9.11 On the basis, of the metric assessment, the applicants have suggested that a payment could be made to the Council so that it might undertake the required offsetting on the applicant's behalf. Whilst this would be feasible in principle, any assessment and requirement would also need to take account of the indirect impacts of the proposals as indicated above and within paragraph 8.6.5 of the London Plan, to be acceptable in ecological terms, and any sum to be paid would need to be proportionate. Neither is the case here. The Biodiversity Officer considers the DEFRA figures to be unrealistic in that even if the values are set aside, unit costs of land management activities varies across the country, with the size/complexity and location and, more importantly, with the type of habitat to be created and thereafter maintained for an agreed (minimum 30 year) period. When these maintenance costs are factored in as well as the Council's administrative and insurance costs, set up fees the total is likely to be much greater. Contrary to the mitigation hierarchy the applicants failed to engage with the Council to discuss offsetting possibilities which would deliver off-site compensation of better biodiversity value.
- 6.9.12 Pre-application discussions in 2019 highlighted the importance of attaining the information relating to impacts on the SINC and ensuring that appropriate surveys were undertaken. The LPA have provided ample opportunity for the applicants to provide this information both prior to and during the application process. Contrary to Policy G6(D) the applicant has failed to attain the best available ecological information to secure clear net biodiversity gain and failed to address these issues from the start of the development process and therefore fails to meet the requirements of the mitigation hierarchy.

6.9.13 As such, the LPA cannot support the application and considers the information supplied with respect to biodiversity insufficient contrary to policies stated at paragraph 6.9.1.

#### *Trees*

- 6.9.14 Policy G7 in the first instance states: Development proposals should ensure that, wherever possible, existing trees of value are retained (including those with Category A, B status and those the LPA consider to be of amenity and biodiversity value). The policy goes on to state that: If planning permission is granted that necessitates the removal of trees then the CAVAT exercise should be carried out to ensure that there is adequate replacement.
- 6.9.15 An Arboricultural Impact Assessment Report was submitted in support of the application produced by MacIntyre Trees Arboricultural Consultancy. The findings of the report detail that the current proposed layout only gives scope for the retention of a small number of boundary groups – G9 in the eastern corner, G8 on the roadside and G7 on the railway land to the south of the site. Furthermore, it states that as a result of post-development pressure all trees in close proximity of proposed buildings will need to be removed in order to enable the current proposed layout. Whilst this would ensure the longevity of the trees sought to be retained this would be at the expense of all others nearest to the proposed buildings. The report then concludes that the inclusion of suitably worded conditions to ensure tree planting and protection for retained trees during construction should be included in any grant for planning permission.
- 6.9.16 The Council's Tree Officer notes that the proposals would necessitate the loss of all internal trees and the majority of the trees along the northern boundary, which were subsequently removed in December 2020, resulting in the retained stock comprising mainly mixed Category B (moderate/good value) and C (low/average value) trees, both individuals and groups. This would result in:
- 10 x 'B' retention category (6 individuals, 2 groups)
  - 24 x 'C' retention category (6 individuals, 5 groups).
  - 1 x 'A' retention category
- 6.9.17 Most notably, one of the two Category A trees (T8 Oak) located on the south eastern boundary would be lost as a result of the proximity and siting of Block E. The Tree Officer notes that as per Development Management Policy DM22 (B)(d) proposals should provide for sufficient space for new or existing trees and planting to grow. The default position is that Category A trees must be retained and integrated into development as an existing landscape asset, rather than a constraint. Accordingly, both the LPA and the GLA (with their stage 1 response) required the justification for the loss of this tree. Accordingly, a CAVAT exercise was undertaken which demonstrates that in quantifiable terms there are an additional 59 trees to be planted on site than the existing and therefore this uplift would compensate for the loss of the Category A oak.
- 6.9.18 Whilst the Council's Tree Officer acknowledges the results of the CAVAT, the officer does not consider sufficient justification to demonstrate that effort has been made to retain the tree. Following, a site meeting with Bartlett's and

Ruskins Tree & Landscapes Ltd who are renowned as experts in moving established trees, it was confirmed that it would be feasible to remove and relocate the Category A oak tree using 'Root Balling' excavation techniques. This can be achieved through implementing a bespoke Plant Health Care Program and a phased partial root pruning conducted 12 months prior to removal during the winter dormancy period. Significant ground preparations must also be conducted during this time to the intended replanting location, and a subsequent 5 year aftercare program.

- 6.9.19 It is proposed to relocate the oak tree south of the main entrance of the site off The Ridgeway. The applicants state that Bartlett calculated the Capital Asset Valuation of Amenity Trees (CAVAT). Based upon the tree's current location within the site, limited visibility and low public amenity its value has been calculated to be; £11,916. Based upon the proposed relocation of T08, Bartlett have recalculated its financial value based upon their recommendations to replant it in the current G2 area; located adjacent to the public highway of The Ridgeway and primary entrance into the site. With this chosen location in mind, T08 will be significantly more visibly from a public location and as a result will have and increased amenity value. Based upon the proposed repositioning within the local landscape, Bartlett have recalculated T08's revised CAVAT value which subsequently increases to; £17,654, an increase of 48% above its current value. This would increase the total tree planting value to £155,234 and reduce the figure for existing trees to be lost down to £85,751. The Council's Tree Officer has considered the updated information and on balance, if feasible, the relocation of the Category A and in light of the CAVAT assessment the loss of the oak in its current location would be acceptable.
- 6.9.20 The removed trees located on the northern boundary of the site are proposed to be replaced by a 1.5m buffer area comprising a hedge. Given that such hedges have the potential to grow large and the limited amenity area for the Mews houses it is noted that this may not be source of value to future occupiers. The tree officer questions the long-term sustainability of these particularly if there is pressure to remove this at post-development stage, in spite of any restrictive condition imposed. The existing mature trees provide a valuable natural screen when viewed from adjacent playing fields towards the site. Whilst the retained trees would screen the new car park associated with the community use within Block J, this building itself would be prominent given the loss of many of the existing trees. Whilst the constraints of the site limit the size of any new trees being planted to a lesser degree than those being lost, as demonstrated by the CAVAT assessment the value of the proposed trees would outweigh the loss of the existing.
- 6.9.21 Notwithstanding the above, the BS5837 recommendation require the presence and proximity of existing trees to be considered in the design process, and a realistic assessment of the probable impacts of any proposed development of the trees and vice versa. It is noted that the Arboricultural Report provided fails to assess the cumulative impact of the root protection area (RPA) incursions, for example from excavations for foundations, utility installations, working space required for construction i.e. scaffoldings etc. Appropriately scaled cross-sections to demonstrate feasibility of such works particularly in light of the close proximity of Blocks A, B, C, D and E to the adjacent SINC and tree boundaries.

Furthermore, proposed buildings should be designed to account for existing nearby trees, size and density of foliage and the effect it would have on the availability of light. This has not been assessed as part of the daylight and sunlight report (As noted above) nor as part of the BS5387 survey.

- 6.9.22 On the basis of the deficiencies outlined above within the Aboricultural Assessment, the applicants have failed to provide sufficient information to assess any interim tree losses i.e. the loss of trees on the northern boundary which were removed in December 2020. Furthermore, the information fails to allow proper assessment to be made of the full or long term impact of trees within the SINC and along the north-western and south-eastern areas of the site, resulting from the close proximity of the proposed blocks to existing and retained trees contrary to Policy G7 which requires development proposals to ensure that, wherever possible, existing trees of value are retained.

### **Conclusion**

- 6.9.23 As a result of the above, it is considered that the proposal development would fail to meet the aspirations of the policies listed under paragraph 6.9.1 above.

## **6.10 Sustainability and Climate Change Mitigation**

- 6.10.1 The relevant policies are:
- National Planning Policy Framework: Chapters 2 and 14
  - The London Plan (2021): GG6, D7, D8, G5, S1 2, SI 3, S1 4, SI 5 and SI 7
  - Harrow Core Strategy: CS1 T
  - Harrow Development Management Local Policies: DM1, DM12, DM13 and DM14

### **Energy and Sustainability**

- 6.10.2 The applicant has submitted an Energy & Sustainability Statement prepared by MECSERVE (Issue 02, April 2020, ref: P-19-073).
- 6.10.3 The overarching target for development in the London Plan (2021) is for major developments to be net 'zero-carbon', with this preferably achieved onsite. 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'. This energy hierarchy has been followed.
- 6.10.4 In line with Policy SI2 of the Mayor's London Plan, the energy statement, sets out how the development proposes to reduce carbon dioxide emissions in accordance with the energy hierarchy. The approach proposed would achieve a 74% carbon dioxide reduction for the domestic element and a 43% reduction for the non-domestic element against 2013 Building Regulations. The carbon dioxide savings

significantly exceed the targets within Policy SI2, which is strongly supported. Within the Stage 1 response, the applicant was required to investigate and adopt further passive measures to reduce the risk of overheating, provide further detail required on the potential to connect to district heating, consider further provision of solar photovoltaic panels and provide further detail on the proposed heat pumps.

- 6.10.5 With regard to using less energy ('be lean'), the Energy Assessment attributes residential CO2 savings of 11% achieving a reduction of 22 tonnes per annum in regulated CO2 emissions compared to a 2013 Building Regulations compliant development, this exceeds the 10% reduction in the London Plan. The non-domestic element of the proposed development is estimated to achieve a reduction of 2 tonnes per annum (17%) in regulated CO2 emissions compared to a 2013 Building Regulations compliant development. This exceeds the 15% reduction target in the London Plan (2021).
- 6.10.6 The GLA had requested the applicant to consider and minimise the estimated energy costs to future occupants and introduce measures to protect the consumer from high prices. Confirmation of quality assurance mechanisms should be considered as part of the energy strategy. As a result, various passive design measures have been integrated in the design of the scheme to reduce heating demand and energy consumption. The associated energy costs have therefore been minimised through the proposed energy efficient design as described in the Energy and Sustainability Statement. The proposed communal heating system would be designed and delivered in line with the guidance and following the quality standards provided in the CIBSE Heat Networks Code of Practice for the UK to reduce maintenance and operating costs. The proposed system i.e. Kensa Shoebox connected to Shared Ground Loop Arrays benefits from independent billing and heat control for each residential unit. Non Domestic RHI tariffs also apply resulting in lower energy bills. Non-Domestic RHI payments for residential properties linked to shared ground loops are paid on the deemed heat consumption taken from the property's Energy Performance Certificate. The GLA consider this information to sufficiently address this point.

### **Overheating**

- 6.10.7 In assessing overheating the applicant has submitted an Overheating Risk Analysis Report.
- 6.10.8 The London Plan seeks to ensure to minimise impacts on the urban heat island through design, layout, orientation, materials and incorporation of green infrastructure. Major developments through their energy strategy should demonstrate how the development will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy set out under policy S1 4. The results of the Dynamic Overheating Analysis, using the CIBSE TM59 methodology, demonstrate that compliance with DSY1 has been achieved, assuming a g-value of 0.4, openable windows, and balcony shading. The applicant also investigated the risk of overheating using the DSY 2 & 3 weather files and failures are noted. Internal blinds are not assumed, but these will be recommended and would provide further improvement in the DSY2 & DSY3 results. The applicant has committed to provide guidance to occupants on minimising the overheating risk and provided example text, which is welcomed.

- 6.10.9 Additionally, the area weighted average (MJ/m<sup>2</sup>) and total (MJ/year) cooling demand for the actual and notional building has been provided and the applicant has demonstrated that the actual building's cooling demand is lower than the notional. On the basis of the above, the information supplied in respect of overheating is considered to be acceptable.
- 6.10.10 The 'be clean' (supplying energy more efficiently) measures, the Energy Strategy details that there are no existing or potential future district heating networks planned in the area of the proposed development and therefore no proposal is made for connection to a decentralised energy network. The GLA required the LPA to confirm this. The Council's Energy Officer stated the Heat Mapping work completed in early 2016 considered a network centred on Grange Farm Estate (estate regeneration project) and extending as far as Whitmore High School and Grange Primary School (about half-way between Grange Farm Estate and the subject site). This Heat Mapping study however concluded that such a network was not financially feasible and consequently the Grange Farm estate regeneration scheme is proceeding on the basis of a heat network / plant room serving just that site. The Internal Rate of Return (IRR) for the broader network was in the order of -5% over 40 years, suggesting that further extension of the network to serve the Ridgeway site is unlikely to result in the network becoming financially viable. From an LPA perspective therefore, there are no existing or propose heat networks the Ridgeway development could connect to. The energy states that the scheme should however be designed to allow future connection to a wider network in the future. In this particular instance (having regard to the specific development, site and location), the omission of a district energy network plant room is considered acceptable.
- 6.10.11 The applicant has provided a commitment that the development is designed to allow future connection to a district heating network. Drawings demonstrating how the site is to be future proofed for a connection to a district heating network have been provided. This includes a single point of connection to the district heating network. The space for future plate heat exchangers appears to be in a car parking space. The lease for the respective tenant should secure the use of the car parking space in the event of future district heating connection.
- 6.10.12 The remaining 29% residential CO<sub>2</sub> savings would come from the 'be green' (renewable energy) stage of the energy hierarchy. The applicant is proposing to install 118.3 kWp of high efficiency Photovoltaic (PV) panels equating to circa 585 m<sup>2</sup> of net PV area and 96000 kWh of electricity generation. A roof layout has been provided, however, it appears that there is additional space for PV although the applicant cites visual impact and roof parapets as a constraint. The proposed PV installation has been revised to maximise the roof areas where PV panels can be installed. As a result, 501 No. PV panels are proposed (170.3kWp) equating to circa 843sqm and 138.8MWh of electricity generation. The Energy Statement Addendum outlines the revised energy strategy and presents the updated carbon figures along with the GLA carbon emission reporting spreadsheet. The GLA has however requested a pre-occupation condition is included to ensure the applicant has maximised opportunities for PV panels.
- 6.10.13 Heat pumps are being proposed in the form of a (centralised) GSHP system. This

will be a Kensa ambient loop system, with centralised GSHP and shoebox units in each flat, and this will serve 100% of heating loads. The applicant has confirmed that the proposed GSHP system is a closed loop vertical borehole system. An initial borehole layout drawing has been prepared which shows that the site has sufficient land area to accommodate the estimated number of boreholes. Approximately 62 closed loop boreholes are required on this site (considering the geological conditions described above and the estimated loads for heating, cooling and DHW). The approximate land area that these will require is 7500m<sup>2</sup>. This site exceeds this land area and so there is sufficient space. The SCOP of shoebox units is cited as 3, and the central plant has a SCOP for space heating of 3.66, a SEER for cooling to non-domestic of 3.20 and a SCOP for DHW of 2.52. The proposed GSHP/WSHP system will provide circa 726MWh/annum of heat, including space heating and DHW for the residential units and non-domestic areas and 18 MWh of comfort cooling for the non-domestic areas. The flow and return temperatures are 5-10C. The GLA had requested further information in respect of the above and was supplied by the applicant. The GLA have confirmed this is acceptable.

6.10.14 As the development would not be able to achieve zero carbon, these emissions need to be offset through a monetary contribution to implement carbon reduction measures elsewhere in the borough. This contribution is calculated at a rate of £95 per tonne of carbon to be offset per year, over a 30-year period (i.e. £95/tonne/per year x 30 years = £2,850 per tonne). 45 tonnes of carbon needs to be offset for domestic and 8 for non-domestic, equating to £151,050 (45 tonnes x £2850 + 8 tonnes x £2850). This contribution should be secured by way of a S106 contribution, payable upon commencement of each phase and verified once each phase is completed and the actual / as-built carbon emissions known. Any shortfall in carbon reductions (i.e. if actual emissions are greater than expected) will result in an additional offset contribution calculated at a rate of £2,850 per tonne. This would have been secured by way of Section 106 contribution had this development been otherwise acceptable.

6.10.15 Given the above, it is considered that the proposed energy strategy follows the energy hierarchy as required by the London Plan. It achieves greater on-site carbon reductions than the minimum 35% required under the London Plan (43% residential / non-residential). The commitment to an existing CHP-led heat network should this become available is considered acceptable in this particular circumstance. Solar PV as a form of renewable energy is considered appropriate to the site. Any remaining residential carbon emissions will be offset by way of a monetary contribution, secured through s106 agreement. Implementation of the energy strategy could be secured by way of condition, with the development to be implemented 'generally in accordance with' the strategy to allow some flexibility as the scheme progresses through detailed design and construction phases.

### **Water Efficiency**

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

## **Wind Microclimate**

6.10.17 The proposed development is not considered to be a tall building as noted above in terms of both local and national definitions and therefore an assessment to this effect has not been submitted.

## **Urban Greening**

6.10.18 Policy G5 of The London Plan sets out that development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include tree planting, green roofs and walls, and soft landscaping. A target of 0.4 for residential development should be achieved in line with this policy.

6.10.19 The revised information indicates that the Urban Greening Factor has been recalculated to take into account the additional green roofs, non-permeable surfaces and tree canopies based on the latest changes to the calculation methods of the 2021 London Plan, with a score of 0.4 achieved across the site. A drawing showing the location and extent of the surface cover types that form the basis of the UGF calculation was requested at Stage 1. This has not been provided and therefore remains outstanding. This should be provided to enable a review of the proposed urban greening prior to stage 2. Notwithstanding this, given that the UGF is stated as being 0.4, it would therefore be compliant with the London Plan target.

## **Site Waste Management**

6.10.20 The applicant has not submitted a Site Waste Management Plan (SWMP) in support of this application. As such, had this application been acceptable the applicant would be required to provide a SWMP for the construction phase before the enabling works commence. This should include details as to the storage of materials, materials procurement, and designation of a Waste Champion, and the provision of an on-site Waste Management entre. The SWMP would be required to adhere to policy SI 7 in the London Plan to reduce waste arising from construction phase of the development.

## **6.11 Land Contamination and Remediation**

6.11.1 The relevant policies are:

- National Planning Policy Framework: Chapter 15
- The London Plan: SD1
- Harrow Core Strategy: CS1
- Harrow Development Management Local Policies: DM15

6.11.2 The applicant has submitted a Phase 1 Desk Study in support of this application. The report concludes that the site has remained largely undeveloped for its entire history, forming open land until the early 1930s and then forming a part of wider allotments until the existing meeting hall was constructed in 1999. Based on the

GQRA and site investigation, the contaminant linkages that have been identified to be potentially complete and to require further action are:

- Direct contact – of contaminant of potential concern within made ground on site by future site users in areas of soft landscaping and private gardens and adjacent site users; and
- Direct contact of contaminants within made ground associated with the workshop area, air conditioning unit, generator room and storage tank to future site users, adjacent site users and future vegetation,

6.11.3 Based on the above a number of recommendations have been set out including the introduction of 5-7 shallow dynamic sampler boreholes to a depth of 5mbgl, deep cable percussion boreholes advanced to a depth of 25 mbgl to determine ground conditions, provide information to assist in the design of piled foundations and confirm the presence / or absence of groundwater; and carry out additional investigation beneath the footprint of the southwestern corner of the meeting hall facility to assess the presence of potential contaminants identified in the CSM. Conditions to this effect would have been included had this application been otherwise deemed acceptable.

## **6.12 Air Quality**

6.12.1 The relevant policies are:

- National Planning Policy Framework: Chapter 15
- The London Plan: SI 1
- Harrow Development Management Local Policies: DM1

6.12.2 The whole of the borough has been designated as an Air Quality Management Area (AQMA), due to exceedances of the annual mean objective levels for nitrogen oxide (NO<sub>2</sub>) and particulates (PM<sub>10</sub>). An Air Quality Assessment (AQA) was been submitted with the application prepared by RSK. Policy SI1 states that this should take an Air Quality Neutral approach. The assessment of this report concludes that this would be achieved.

6.12.3 The applicant has screened out air quality impacts at existing sensitive locations as it is predicted the proposed development will lead to a net decrease in vehicle trips compared to the previous site use. However, the GLA noted within their Stage 1 response that the Transport Statement explains that the site is not operational and currently vacant. Therefore, any redevelopment would lead to an increase in vehicle trips compared with the existing baseline. As the site is located in an Air Quality Management Area and new trips exceed 100 AADT, the GLA requested that a detailed assessment is provided in order to ensure there are no adverse impacts on existing air quality. Following this, Daniel Watney LLP provided a response to these comments in a letter dated 15th March 2021, explaining that the initial methodology is appropriate. This is because while the existing site is vacant, it could be brought into lawful use at any time and thus attract the commensurate vehicle trips.

6.12.4 The GLA note that: Developments are only considered acceptable, without additional mitigation, if they both meet the air quality neutral benchmarks and have

insignificant impacts on air quality in the local area. This is explained in paragraph 9.1.9 of the London Plan. An air quality impact assessment will account for existing baseline conditions often derived from monitoring data. It will then compare the difference between air quality conditions with and without the development and established whether the change are significant. Therefore, if a site has remained vacant for a period over which the baseline conditions are established, the assessment must reflect the change compared to this baseline.

- 6.12.5 Accordingly, a further review of the submitted air quality assessment and transport assessment was been carried out. The transport assessment predicts that the proposed development would result in an additional 205 daily vehicle movements (car drivers plus servicing and delivery vehicles). This exceeds the screening threshold of 100 daily vehicle movements (as per the EPUK/IAQM guidance 'Planning for air quality') which would trigger a detailed assessment of the impacts on air quality at existing sensitive locations within an Air Quality Management Area (AQMA).
- 6.12.6 However, the air quality assessment did predict pollutant concentrations for future occupants, which demonstrated that air quality conditions in the local area were <75% of the air quality objective. Furthermore, many existing sensitive receptors (properties, doctors surgery) in the local area are set back from the roadside. The impact from the 205 vehicle movements is thus likely to be negligible with reference to the EPUK/IAQM guidance descriptors. Therefore, in this specific case, it is agreed that the development is unlikely to lead to significant impacts on local air quality, and additional mitigation is not required. However, it is also emphasised that air quality assessments must take account of the most realistic and representative baseline scenario to provide an accurate assessment of potential impacts, and screening on the basis of extant lawful use is often not acceptable. Notwithstanding this, the GLA have recommended that conditions including compliance with the NRMM Low Emission Zone for all on-site construction machinery and mitigation measures relevant to a medium risk construction site (detailed in Appendix B of the air quality assessment) should be written into an Air Quality and Dust Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG and implemented in full throughout the construction phase.
- 6.12.7 Overall it is considered that the proposed development would comply with the policies listed under paragraph 6.12.1 of this appraisal, subject to conditions stated above.

## **6.13 Secure by Design**

- 6.13.1 The Metropolitan Police Secure by Design Officer was consulted during the application and raised a number of concerns. The updated scheme has been revised in an attempt to overcome these concerns. Notwithstanding this, the Metropolitan Police do not consider that the updated documents have sufficiently addressed these.
- 6.13.2 The detailed landscape plans now show the provision of two raised tables on the roads within the site to provide natural traffic calming within the development to address issues relating to anti-social vehicle use. Other concerns raised by the

police include lack of anti-crime features along the proposed pathway and the permeability along all four sides of most of the blocks, which could be exploited to commit crime. The police have also raised the following issues in respect of specific blocks. Recessed doorways, lack of postal strategy and defensible space for ground floor flats for Blocks A and B have been highlighted. For Blocks C, D and E are stated to require full compartmentalisation for Secure by Design, including for defensible space for Blocks E and J in particular. Internally, Block G would include void areas which could be exploited by criminals and may need redesign. Based on these, amongst other concerns, the policy considered the submitted plans fall short of achieving secure by design accreditation.

- 6.13.3 The applicant had early engagement with SBD Officers, and implemented some measures as a result of these discussions including providing greater opportunity for natural surveillance to the south-east corner, ground floor dwellings to Block E which directly overlook this area along with the flatted accommodation above with habitable rooms facing the footpath connection towards the station. Furthermore, all individual ground floor accommodation with private access would now have recessed doorways of 600mm in line with SBD principles. A proposed lighting strategy would be well lit and those entrances in more exposed areas would be accessed via gates and include private defensible space. Flatted core entrances recessed more than 600mm would be fully glazed, will be well lit and overlooked.
- 6.13.4 Efforts have been made to implement SBD principles into the scheme. In respect of potential void areas, indicative secure fencing has been shown to the maintenance area behind flatted Blocks C, D and E, the exact location, height and nature can be secured by condition. The podium car parking would be fully enclosed and gated with resident only access. The ribbed brickwork shown to Blocks F and G would not project sufficiently to allow climbing. Any hit and miss brickwork shown stops with a large distance before the podium level so access via the brickwork would not be possible. Notwithstanding the objection raised, it is considered that further discussion with SBD Officers could assist to overcoming the main concerns and a refusal on this basis would therefore not be warranted. However, given that the application is otherwise unacceptable any future application should be designed with due regard SBD principles. On balance therefore a pre-occupation requiring Secure by Design accreditation would have been included had this application otherwise been acceptable.

## **6.14 Statement of Community Engagement**

- 6.14.1 The NPPF, Localism Act and the Council's Statement of Community Involvement encourage developers, in the cause of major applications such as this, to undertake public consultation exercise prior to submission of a formal application.
- 6.14.2 Prior to the submission of this application, the applicant held two meetings with the West Harrow ward Councillors (10/09/2019 & 26/11/2019); a meeting with the West Harrow Allotment Association an Harrow in Leaf (03/01/2019); a meeting with the Harrow and Leaf and Harrow Beekeepers Association (17/10/2019) and held one public consultation event on the 16<sup>th</sup> and 17<sup>th</sup> October 2019 as well as an information leaflet being sent to 1,375 residents and businesses with information on the proposed development and invitation to the public consultation event. Furthermore, the proposed scheme was presented to the Major Development

Panel on 19 November 2019. Online engagement has also continued through a dedicated website: [www.265theridgeway.co.uk](http://www.265theridgeway.co.uk). The details of these have been included within the Statement of Community Involvement provided as part of the submission.

6.14.3 The Council also sent out letters of consultation to local residents in the surrounding area inviting them to make representations on the proposed development.

6.14.4 The applicant has sought to encourage public consultation in respect the proposal in line with the guidance set out in the NPPF and the Localism Act.

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

6.15.1 The relevant policies are:

- The London Plan (2021): DF1
- Harrow Core Strategy (2012): CS1.Z/AA, CS2.Q
- Harrow Development Management Polices Local Plan (2013): DM50

6.15.2 If this development was considered to be acceptable in all regards, in addition to conditions, the following planning obligations would be considered appropriate:

- Affordable Housing: early and late stage review;
- S78 Agreement - public realm improvements;
- Carbon offset;
- Travel plan, bond and monitoring fees;
- Cycle stand maintenance contribution.
- Maintenance agreement – trees/shrubs on the highway;
- Financial Biodiversity Contribution.

## **7.0 CONCLUSION AND REASONS FOR REFUSAL**

7.1.1 The redevelopment of the site would fail to provide the maximum reasonable affordable housing and tenure mix as prescribed within the Council's Policy and meet the identified priority housing need within the Borough.

7.1.2 The proposed development, in the absence of sufficient information within the provided Ecological Impact Assessment to quantify the ongoing impacts on the adjacent Site of Importance for Nature Conservation (SINC) or provision of opportunities for local biodiversity mitigation or enhancement within the vicinity of the site, thereby fails to demonstrate that biodiversity value of the surrounding area would not be harmed, protected or enhanced.

7.1.3 Insufficient information has been provided to determine the cumulative impact on Root Protection Area (RPA) incursions and long-term post-development physical, environmental and social pressure on existing trees adjacent to the development site, namely within the Site of Importance for Nature Conservation (SINC) and along the south-eastern boundary / embankment; as well as the development impact on the availability of light to ensure their long-term survival due to their close proximity to the proposed development. The Arboricultural Report also fails to take into account the impact of the adjacent trees on future occupiers and as such

the assessment supplied has not demonstrated that the existing trees of value could in reality be retained and / or could withstand post-development pressure from either the proposed buildings or needs of future occupiers.

7.1.4 The submitted Daylight and Sunlight Report does not sufficiently assess the impact of the adjacent SINC or retained trees along the railway embankment on habitable rooms of future occupiers in terms of daylight, sunlight and overshadowing as required by the London Plan and is therefore not considered adequate. As a result of the above, it is considered the impact to the rear facing habitable rooms within Block A, namely units A00 – A06, resulting from the close proximity of the block to the existing SINC and potential overshadowing impact.

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

### Informatives

1	<p>INFORMATIVE: The following policies are relevant to this decision:</p> <p>National Planning Policy Framework (2019)</p> <p>The London Plan (2021) Policies: SD7, GG2, GG4, D1, D2, D3, D4, D5, D6, D7, D8, D11, D13, H1, H4, H5, H6, H7, H10, H15, G5, G6, G7, SI 2, SI 1, SI 3, SI 4, S1 5, S1 7, SI12, SI13, T2, T4, T6, T6.1, T6.3, T6.5</p> <p>The Harrow Core Strategy (2012) Core Policies CS1</p> <p>Development Management Policies Local Plan (2013) Policies DM1, DM2, DM3, DM7, DM9, DM10, DM12, DM13, DM14, DM15, DM20, DM21, DM22, DM23, DM24, DM27, DM28, DM35, DM42, DM45, DM49, DM50</p> <p>Supplementary Planning Document – Residential Design Guide (2010) Code of Practice for Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (2016) Planning Obligations and Affordable Housing Supplementary Planning Document (2013) Mayors Housing Supplementary Planning Guidance (2016) Mayors Accessibility Supplementary Planning Guidance (2014) Mayors Affordable Housing and Viability Supplementary Planning Guidance (2017)</p>
2	<p>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</p>

	<p>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 £774,660 (with indexation)</p> <p>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).</p> <p>You are advised to visit the planningportal website where you can download the appropriate document templates.</p> <p>Please complete and return the Assumption of Liability Form 1 and CIL Additional Information Form 0 .</p> <p><a href="https://ecab.planningportal.co.uk/uploads/1app/forms/form_1_assumption_of_liability.pdf">https://ecab.planningportal.co.uk/uploads/1app/forms/form_1_assumption_of_liability.pdf</a></p> <p><a href="https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf">https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf</a></p> <p>If you have a Commencement Date please also complete CIL Form 6:</p> <p><a href="https://ecab.planningportal.co.uk/uploads/1app/forms/form_6_commencement_notice.pdf">https://ecab.planningportal.co.uk/uploads/1app/forms/form_6_commencement_notice.pdf</a></p> <p>The above forms should be emailed to <a href="mailto:HarrowCIL@Harrow.gov.uk">HarrowCIL@Harrow.gov.uk</a></p> <p>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</p>
3	<p>Harrow has a Community Infrastructure Levy which applies Borough wide for certain developments of over 100sqm gross internal floor space. Harrow's Charges are:</p> <p>Residential (Use Class C3) - £110 per sqm;</p> <p>Hotels (Use Class C1), Residential Institutions except Hospitals, (Use Class C2), Student Accommodation, Hostels and HMOs (Sui generis) - £55 per sqm;</p> <p>Retail (Use Class A1), Financial &amp; 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</p> <p>All other uses - Nil.</p> <p>The Provisional Harrow CIL liability for the application, based on the Harrow CIL levy rate for Harrow of £110/sqm is £1,965902.40 (with indexation)</p> <p>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).</p> <p>The CIL Liability is payable upon the commencement of development.</p> <p>You are advised to visit the planningportal website where you can download the relevant CIL Forms.</p> <p>Please complete and return the Assumption of Liability Form 1 and CIL Additional Information Form 0 .</p> <p><a href="https://ecab.planningportal.co.uk/uploads/1app/forms/form_1_assumption_of_liability.pdf">https://ecab.planningportal.co.uk/uploads/1app/forms/form_1_assumption_of_liability.pdf</a></p> <p><a href="https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf">https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf</a></p>

If you have a Commencement Date please also complete CIL Form 6:  
[https://ecab.planningportal.co.uk/uploads/1app/forms/form\\_6\\_commencement\\_notice.pdf](https://ecab.planningportal.co.uk/uploads/1app/forms/form_6_commencement_notice.pdf)  
The above forms should be emailed to [HarrowCIL@Harrow.gov.uk](mailto:HarrowCIL@Harrow.gov.uk)  
Please note that the above forms must be completed and provided to the Council prior to the commencement of the development; failure to do this may result in surcharges.

**Checked**

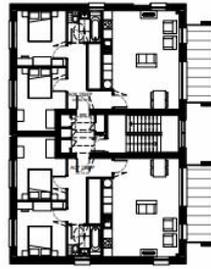
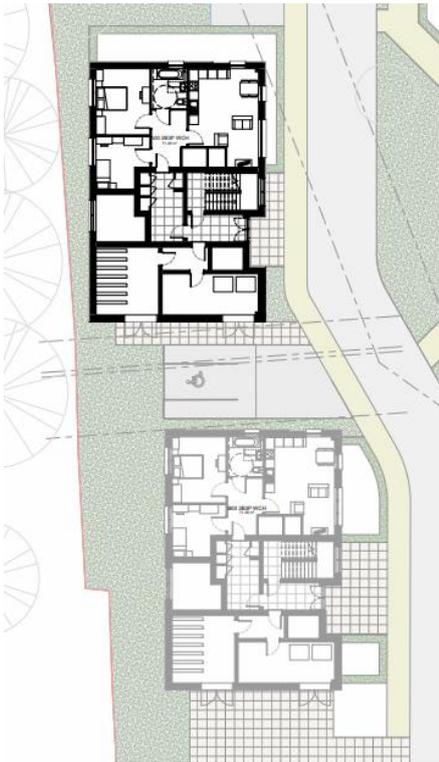
<u>Interim Chief Planning Officer</u>	<u>Beverley Kuchar 15/07/2021</u>
<u>Corporate Director</u>	<u>Mark Billington 15/07/2021</u>

## APPENDIX 2: SITE PLAN

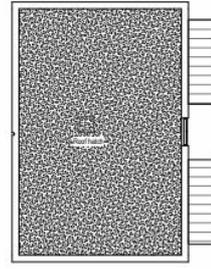


Proposed site plan

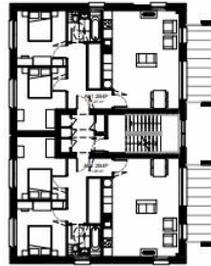
## APPENDIX 3: PLANS AND ELEVATIONS



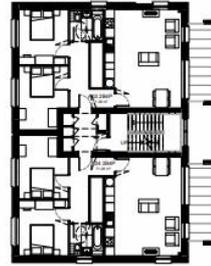
Block A - level 03  
1:100



Block A - level 04  
1:100

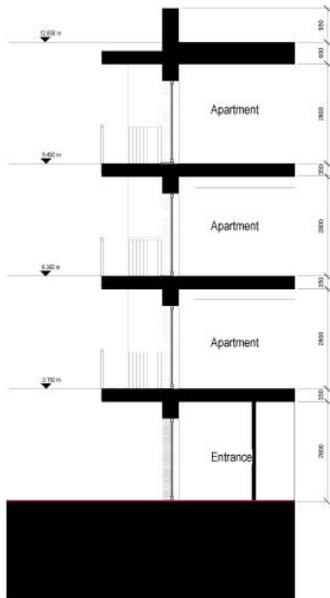


Block A - level 01  
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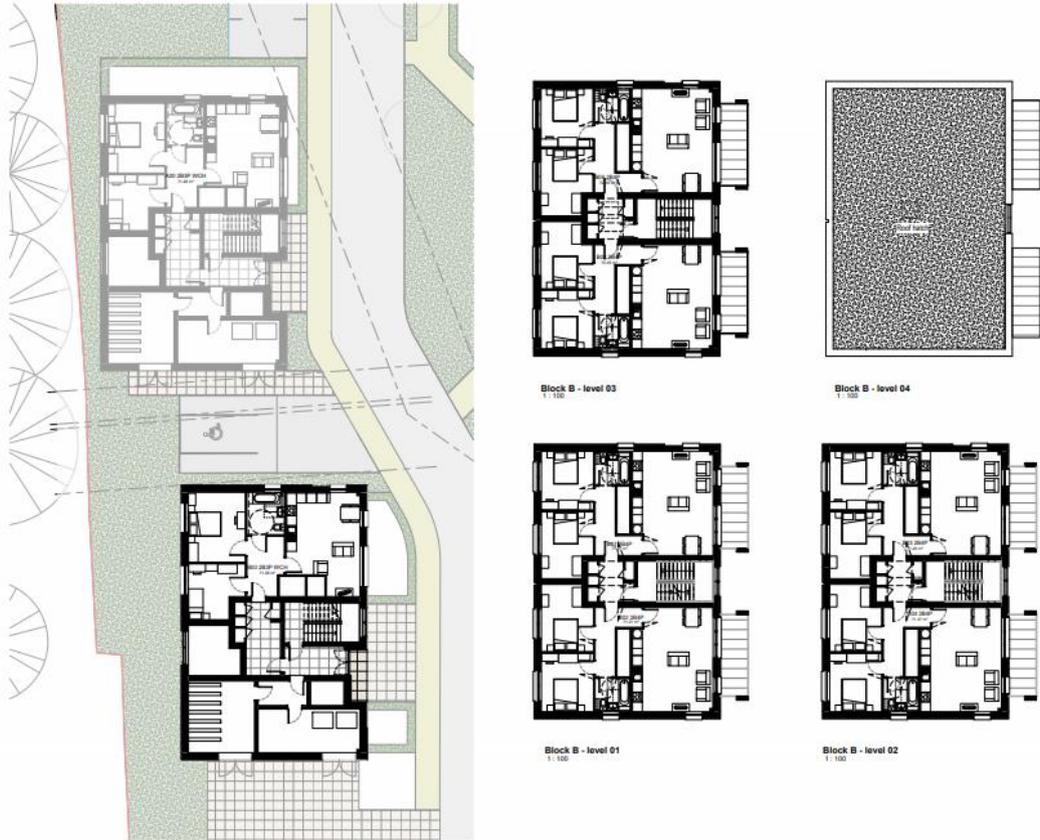


Block A - level 02  
1:100

Block A – Proposed Floor Plans



Block A – Proposed Elevations



Block B – Proposed Plans



Block C, D, E – Proposed Ground Floor Plan



Blocks C, D, E – Proposed Floor Plans



Block C Elevation South-East Copy 1  
1:100



Block C Elevation North-East  
1:100



Block C Elevation North-West  
1:100



Block C Elevation South-West  
1:100

Blocks C – Proposed Elevations



Block D Elevation South-East  
1:100



Block D Elevation North-East  
1:100



Block D Elevation North-West  
1:100



Block D Elevation South-West  
1:100

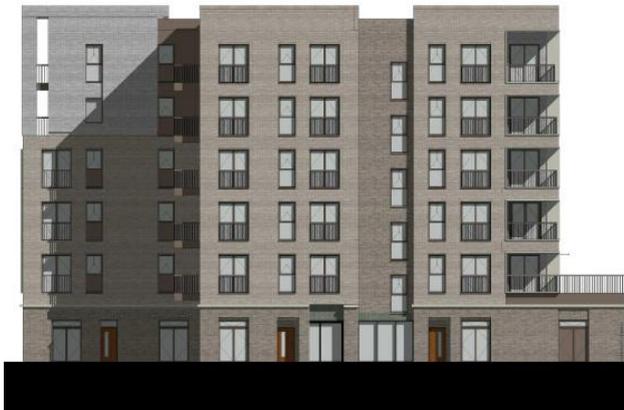
## Block D -Proposed Elevations



Block E Elevation South-East  
1:100



Block E Elevation North-East  
1:100

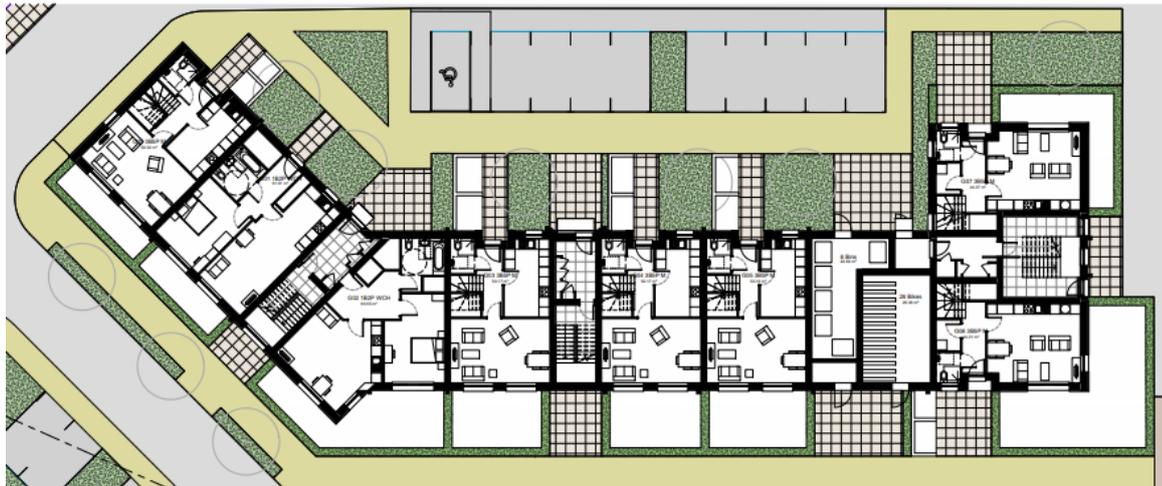


Block E Elevation North-West  
1:100

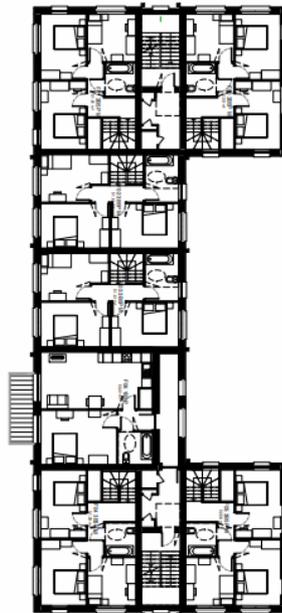
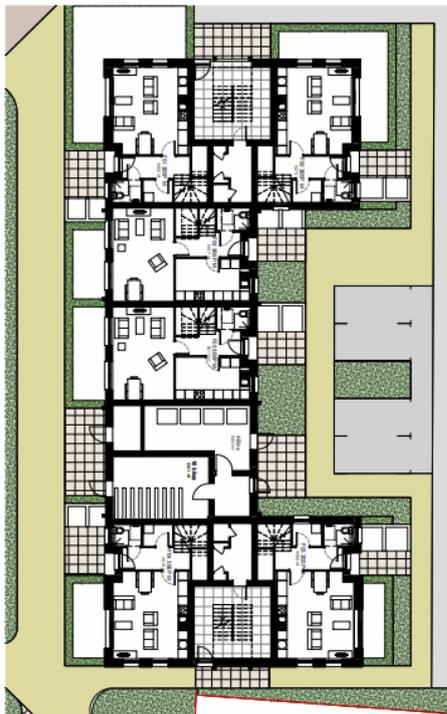


Block E Elevation South-West  
1:100

## Block E – Proposed Elevations



Block G - Proposed Floor Plans



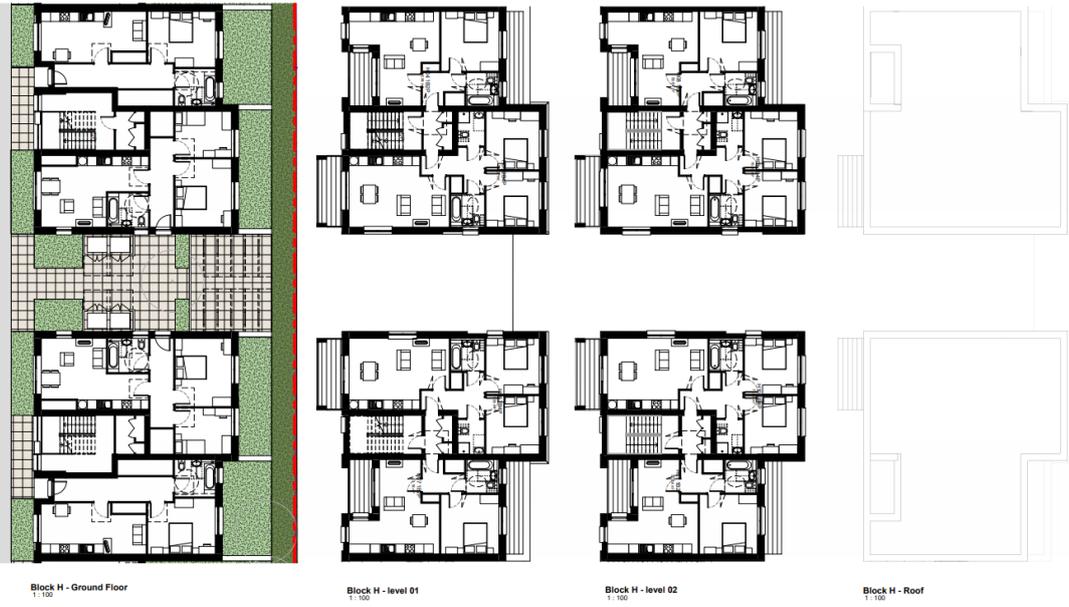
Block F – Proposed Floor Plans



2. Elevation South, Maisonnets  
1:200

4. Revised Planning Im  
Rev: Description

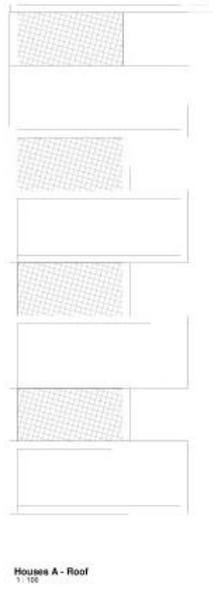
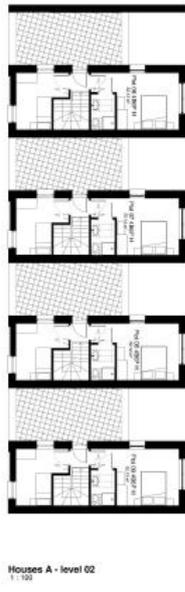
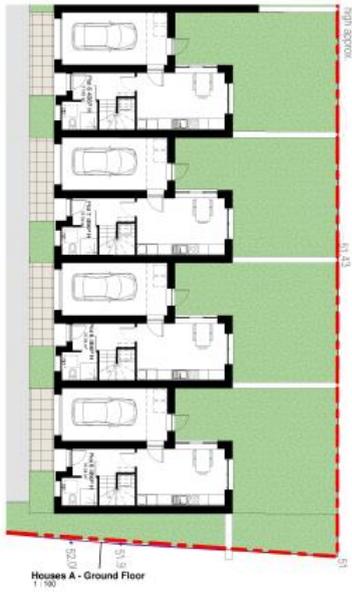
## Blocks G and F – Proposed Elevations



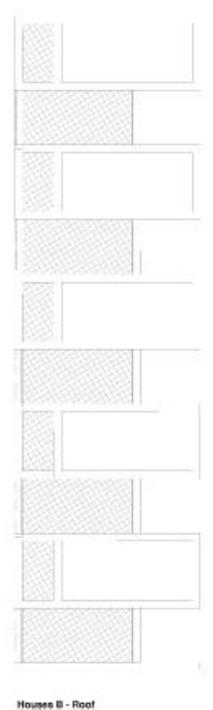
## Block H – Proposed Floor Plans



## Block J – Proposed Plans



House Type A – Proposed Plans



House Type B – Proposed Plans



House Types A and B – Proposed Elevations



Elevation South. Houses

House Types A and B and Block H – Proposed Elevations



Block J – Proposed Elevations



Illustrative view from the West Harrow Allotments



Illustrative view from West Harrow Underground Station and West Harrow Allotments



Illustrative View from West Harrow Recreation Ground



Illustrative View within the Mews Court



Illustrative view of village green

**APPENDIX 4: SITE PHOTOS**



Application Site – View from north towards existing building



View of existing building on left and SINC embankment to the right



Entrance to the site located adjacent to the SINC to the right.



Metal fencing (left) with barbed wire on southern boundary, existing mature trees on southern boundary (central) and Existing woodland fronting the railway line (right)



Aerial View of application site

## APPENDIX 5: GLA STAGE 1 RESPONSE

GREATER LONDON AUTHORITY

planning report GLA/5335/01

6 July 2020

### **265 The Ridgeway, West Harrow**

in the London Borough of Harrow

planning application no. P/1492/20

<p><b>Strategic planning application stage 1 referral</b> Town &amp; Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town &amp; Country Planning (Mayor of London) Order 2008.</p>
<p><b>The proposal</b> Redevelopment of the site to provide a mixed-use scheme comprising buildings ranging from 3-7 storeys for the provision of 178 residential units, 900 sq.m. of D1 floorspace and associated open space, landscaping, access, car parking, refuse stores and cycle parking and other associated works.</p>
<p><b>The applicant</b> The applicant is <b>Harrow Gospel Church Hall</b> and the architect is <b>TateHindle</b>.</p>
<p><b>Strategic issues summary</b> <b>Principle of development:</b> The applicant should provide further details on the community floorspace to show that it has been designed to meet the needs of a GP surgery. This brownfield site is an optimal location for residential development and the proposed residential units are strongly supported (paragraphs 16-23). <b>Housing:</b> 40% affordable housing by habitable room and unit is proposed is proposed split 60%/40% affordable rent/intermediate. This offer exceeds the 35% threshold for the Fast Track Route and is strongly supported. Grant funding must be investigated and further detail on the affordable rent levels and the intermediate housing income thresholds should be provided before the proposal can be considered under the Fast Track Route. An early stage review must be secured. None of the low-cost rent housing would be family-sized; the applicant should consult with the Council on increasing this provision to reflect local need (paragraphs 24-30). <b>Urban design:</b> More prominent architecture and signage around the entrance to the GP surgery to aid wayfinding should be considered. Further urban greening to obscure the remaining area of inactive frontages should also be considered. The drawings should be revised to show a clear separation of pedestrians and vehicles on the central route through the site (paragraphs 31-39). <b>Transport:</b> The development is generally acceptable in strategic transport terms. Improvements to the width and safety of pedestrian routes through the site are required and cycle parking should meet the London Cycling Design Standards. Appropriate conditions and obligations should also be secured (paragraphs 56-69). Further information on <b>air quality, energy, water</b> and <b>urban greening</b> is required.</p>
<p><b>Recommendation</b> That Harrow Council be advised that the application does not yet comply with the London Plan and the Mayor's intend to publish London Plan, for the reasons set out in paragraph 73 of this report; but that the possible remedies set out that paragraph could address these deficiencies.</p>

## Context

1 On 1 June 2020, the Mayor of London received documents from Harrow Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has until 12 July 2020 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

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

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

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

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

## Site description

5 The roughly triangular-shaped 1.4 hectare site is in West Harrow in the London Borough of Harrow. It is bounded by a Site of Importance for Nature Conservation (SINC) along The Ridgeway to the south west, allotments to the north and the Metropolitan Line between Uxbridge and Harrow on the Hill to the south east. The surrounding context is suburban 20<sup>th</sup> century detached and semi-detached housing.

6 The site does not have any strategic planning designations and does not have a site allocation. The site is also not close to any conservation areas or listed buildings. The nearest town centre is Rayners Lane District Town Centre, which is approximately 1 kilometre walking distance to the east of the site.

7 The site is located to the north-east side of The Ridgeway, part of the borough highway network. The nearest section of the Strategic Road Network (SRN) is the A404 Pinner Road located 1.3 kilometres due north of the site. Despite West Harrow Station being located approximately 500 metres east of the site, existing pedestrian and cyclist access is currently convoluted, and a lengthy 1 kilometre or 13 minute walk away. The nearest bus stops to the site are located on Elm Drive and Imperial Drive approximately 350 and 600 metres north of the site respectively; these stops serve bus routes H9, H10 and H11. The site has a Public Transport Access Level (PTAL) of 1b on a scale of 1 – 6b where 6b is the highest.

## Details of the proposal

8 The applicant is proposing to redevelop the site for 178 residential units arranged within 7 buildings, ranging in height from 3 to 7 storeys. To the north west of the site would be a 900 sq.m. community use, which is proposed to be a GP surgery.

9 The buildings would be divided by a central green space that is required as easement for the Thames Water sewage main running through the centre of the site. To the south of this buffer would be two 4 storey blocks, Blocks A and B and three higher rise blocks, Blocks C, D and E, each rising to 7 storeys. To the north of the central green space would be two four-storey blocks of stacked maisonettes, Blocks G and F. To the north of this would be two rows of terraced housing, with a central three storey apartment block, Block H. At the entrance of the site to the north west would be the GP surgery, which would have residential units above rising to 4 storeys, Block J.

10 The applicant is proposing a further access point for pedestrians and cyclists would be created to the north east of the site connecting to an existing route to West Harrow station. The proposal would also feature extensive green space and landscaping and car and cycle parking as well as associated plant.

Floorspace by use (GIA)	Existing (sq.m.)	Proposed (sq.m.)
<b>Residential</b>	0	12,411
<b>Community floorspace (Use Class D1)</b>	900	900
<b>Total</b>	900	13,311

Table 1: Proposed floorspace

## Case history

11 A pre-application meeting was held on 23 January 2020 to discuss the current proposals for development. Officers issued a pre-application report on 5 March 2020 (reference pre-application report GLA/5335/01), which concluded that the principle of the proposed residential-led redevelopment including 40% affordable housing was supported, subject to the appropriate re-provision of social infrastructure. Further comments relating to social infrastructure, housing, affordable housing, urban design, inclusive design, inclusive access, transport, and environment were also required to be addressed in any application. There is no other strategic planning history associated with the site.

## Strategic planning issues and relevant policies and guidance

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Harrow Core Strategy (2012), the Harrow Development Management Policies (2013), the Harrow Site Allocations (2013) and the London Plan 2016 (consolidated with alterations since 2011).

13 The following are also relevant material considerations:

- The National Planning Policy Framework (revised February 2019);
- National Planning Practice Guidance;
- The London Plan Intend to Publish version (December 2019);
- In August 2017 the Mayor published his Affordable Housing and Viability SPG. This must now be read subject to the decision in R (McCarthy & Stone) v. Mayor of London.

14 On 13 March 2020 the Secretary of State issued a set of Directions under Section 337 of the Greater London Authority Act 1999 (as amended) and, to the extent that they

are relevant to this particular application, have been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation.

15 The relevant issues and corresponding policies are as follows:

- Land uses *London Plan;*
- Social infrastructure *London Plan; Social Infrastructure SPG;*
- Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Transport & Parking *London Plan; Mayor's Transport Strategy;*
- Environment *London Plan; Sustainable Design and Construction SPG; London Environment Strategy.*

## **Principle of development**

### Social infrastructure

16 Places of worship are defined as social infrastructure in the London Plan and the Mayor's intend to publish London Plan. London Plan Policy 3.16 and the Mayor's intend to publish London Plan Policy S1 seek to protect London's social infrastructure and resist its loss. London Plan Policy 3.17 and the Mayor's intend to publish London Plan Policy S2 support the provision of new health and social care infrastructure provision in areas of identified need, in places easily accessible by public transport, walking and cycling. Policy S2 further encourages the co-location of health and social services with housing, to achieve a more efficient land use.

17 The Mayor's intend to publish London Plan objective GG1 seeks to support and promote the creation of an inclusive city where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, sexual orientation, social class, or whether they are pregnant or have children can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities. More generally, the Equality Act 2010 places a duty on public bodies, including the GLA and the Mayor, in the exercise of their functions, to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requirement includes removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic and taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.

18 The site is currently occupied by the Harrow Gospel Hall, which the applicant has stated is now no longer in operation and proposed to replace with an equivalent amount of new community floorspace to be used as a GP surgery. The church is not proposed to be re-provided as the congregation has moved away from the local area. It is noted that

the hall ceased to be used as a religious meeting hall in February 2017 and is now vacant. As such, officers consider that the loss of the church is very unlikely to place a disadvantage on any person with a protected characteristic, particularly religion, as it has not been used for around 3 years now. In addition, the new community floorspace is likely to directly benefit people from almost all protected characteristics. As it is not listed or otherwise noted for its architectural merit and its location within the site would prevent the optimisation of development, and the applicant is proposing to replace the community floorspace, the loss of the hall is acceptable.

19 The applicant proposes to provide 900 sq.m. of new community floorspace on a site that will be within walking distance of West Harrow station, which is welcomed. The applicant is proposing that this space would be used as a GP surgery. It has noted that the five GP surgeries nearest to the development have more patients than the best practice ratio of 1 GP per 1,800 patients, with an average of 1 GP for 2,397 patients. The development could be occupied by up to 400 people, who will add new and further pressure to this provision. As such, the applicant is in discussions with a nearby GP surgery, Ridgeway Surgery for it to relocate to this space, which would result in an expanded GP surgery.

20 However, the plans provided appear to show only the shell and core, with no indication of its internal design. The applicant should provide further details of its correspondence with the GP surgery to confirm it is satisfied the space would meet its needs or provide an indicative layout of the proposed health centre to demonstrate that it has been designed to meet the needs of a GP surgery. The Council should consider securing the design of the space to meet the needs of a GP surgery by condition. The applicant should ensure that the existing health centre is not closed until the new health centre is completed.

21 Subject to the provision of further information confirming that the community floorspace is designed to accommodate a GP surgery, the proposed community floorspace is strongly supported.

### Housing

22 London Plan Policy 3.3 sets Harrow an annualised average housing completion target of 5,927 units between 2015 and 2025. This is increased to 8,020 units between 2019/20 and 2028/29 in the Mayor's intend to publish London Plan Policy H1. London Plan Policy 3.3 supports residential development as part of the mixed-use redevelopment of surplus commercial capacity with good transport accessibility.

23 The site is around 500 metres in a direct line to West Harrow station, or 1 kilometre walking distance, and the applicant proposes to improve this further through a direct pedestrian and cycling route from the site to the station. The site is also under-utilised, occupied only by a vacant church hall and extensive car parking. As such, this brownfield site is an optimal location for residential development and therefore the proposed 178 new residential units are strongly supported in principle.

### **Housing**

24 The following residential unit breakdown has been provided with the application:

Housing type	1 bed units	2 bed units	3 bed units	4 bed units	Total units (%)	Total habitable rooms (%)
<b>Market</b>	45	37	19	4	105 (59%)	297 (60%)
<b>Intermediate</b>	9	12	6	0	27 (15%)	78 (16%)
<b>Affordable rent</b>	21	25	0	0	46 (26%)	117 (24%)
<b>Total</b>	<b>75</b>	<b>74</b>	<b>25</b>	<b>4</b>	<b>178</b>	<b>492</b>
<b>Percentage of units</b>	42%	42%	14%	2%		

Table 2: Proposed housing provision

### Affordable housing

25 London Plan Policy 3.9 seeks to promote mixed and balanced communities by tenure and household income and Policy 3.12 seeks to secure the maximum reasonable amount of affordable housing. Policy H4 of the Mayor's intend to publish London Plan and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. Policy H5 of the Mayor's intend to publish London Plan and the Mayor's Affordable Housing and Viability SPG set out a 'threshold approach' whereby schemes meeting or exceeding a specific threshold of affordable housing (in this case 35%) by habitable room without public subsidy and which meet other criteria are not required to submit viability information to the GLA, nor would the application be subject to a late stage review mechanism. At a local level, Harrow Council's Core Strategy (2012) sets a borough-wide strategic target of 40% affordable housing, with Harrow's Planning Obligations (S106) SPD (2013) setting a strategic target of 60% of affordable housing as social or affordable rent, and 40% as intermediate.

26 The applicant proposes to deliver 40% of the scheme by unit and habitable room as affordable housing, split 60% affordable rent and 40% intermediate. Whilst the provision of a 40% affordable housing offer at an acceptable tenure split (before public subsidy) is strongly supported and exceeds the 35% threshold for the Fast Track Route, developers are required to work with the Mayor, Local Planning Authorities and Registered Providers to ensure that the provision of affordable housing is maximised from all sources. The applicant must investigate the potential for Mayoral grant funding (and any other available public subsidy) with a view to further increasing affordable housing delivery within the scheme before the proposal can be considered under the Fast Track Route in accordance with Policy H5 of the Mayor's intend to publish London Plan.

27 The applicant has not provided any detail regarding the affordable rent levels or the income thresholds associated with the intermediate rent units. The affordability of the units must comply with the requirements of Policy H6 of the Mayor's intend to publish London Plan, the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report (AMR). The proposed type of affordable rent tenure should be clarified, such as London Affordable Rent, and benchmark rent levels must be detailed for each unit size. In accordance with paragraph 4.6.9 of the Mayor's intend to publish London Plan, the intermediate homes should be available to people on a range of incomes below the maximum household income, which is currently £90,000, as set out in the AMR. Once agreed, these ranges for the intermediate units and the rent levels for the affordable rent units must be secured within the S106 agreement.

28 Should the scheme qualify for the Fast Track Route, the associated section 106 agreement must contain an early stage viability review to be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the Council), as set out in the Mayor's Affordable Housing and Viability SPG and Policy H5 of the Mayor's intend to publish London Plan. GLA officers request early engagement with the Council and the applicant to ensure appropriate wording for review mechanisms.

#### Housing choice

29 London Plan Policy 3.8 and the Mayor's intend to publish London Plan Policy H10 encourage a full range of housing choice. Policy H10 'Housing size mix' of the Mayor's intend to publish London Plan states that boroughs should provide guidance on the size of units required to ensure affordable housing meets identified needs. Of the 178 units, 16% of the total units are three- or four-bedroom family-sized units, but only 8% of the affordable housing, and none of the low-cost rent housing, would be family-sized. This is a very low level of provision for a suburban outer London location and the applicant should consult with the Council on increasing this provision to reflect local need, particularly for the affordable rented accommodation.

#### Children's play space

30 Policy S4 of the Mayor's intend to publish London Plan and London Plan Policy 3.6 seek to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child. The proposal would provide 1,243 sq.m. of dedicated play space, which is more than the 873 sq.m. of play space calculated requirement based on the development's child yield based on the Mayor's SPG. As such, officers consider that the level of play space on-site is sufficient to meet the needs of the development. It is further noted that West Harrow Park is on the other site of the London Underground lines and is within easy walking distance of the site. All of the play space would be within the accessible public realm and so would not be segregated by tenure.

### **Urban design**

31 London Plan Policies 7.1 and 7.4 and the Mayor's intend to publish London Plan Policies D1, D2 and D3 seek to ensure that new developments are well-designed and fit into the local character of an area. New buildings and spaces should respond to the form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhancement of the historic environment. London Plan Policy 3.4 and the Mayor's intend to publish London Plan Policy D3 also seek to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and the capacity of existing and future transport services, using an assessment of site context and a design-led approach to determine site capacity.

#### Design scrutiny and management

32 London Plan Policy 3.4 and the Mayor's intend to publish London Plan Policy D3 seek to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and the capacity of existing and future transport services,

using an assessment of site context and a design-led approach to determine site capacity.

33 The scheme would have a residential density of 127 units per hectare, which is below the threshold for increased design scrutiny as set out in the Mayor's intend to publish London Plan Policy D4 and a management plan is therefore not required. Given the constraints of the site in terms of the Thames Water easement running through the centre of the site and need to avoid negative daylight and sunlight impacts on the allotments to the north, the proposed density is considered to effectively optimise the development of the site.

#### Architecture

34 The proposed architecture is high quality and the simple palette of brick materials is supported. The variation between projecting balconies on the maisonettes and inset balconies elsewhere helps to define the buildings around the central green spaces.

#### Layout, height and massing

35 The general layout and massing principles are supported. The massing provides a strong transition of scale, between low-rise townhouses to the north, maisonettes at the centre of the site and higher-rise flats to the south along the railway line. Placing the lower rise houses to the north of the site is a sensitive approach that limits overshadowing on the allotments and so does not compromise their use. The position of the community use at the west of the site next to the entrance is logical and the general materials and architecture are supported. However, the applicant should consider whether more prominent architecture and signage around the entrance to the building could aid with wayfinding to the GP surgery.

36 The two central open spaces are well-defined and would provide a strong green link through the centre of the site, which is supported. Both spaces would be surrounded by active frontages with defensible front garden spaces in front of every ground floor unit. The applicant should consider whether planting could help to obscure the remaining area of inactive frontages, such as at the intersection of Blocks D and E. The applicant should address issues around the route through the centre of the site. Whilst the CGIs and some plans in the design and access statement show a raised pavement, this is not evident along the front of Blocks D and E. The drawings should be revised to show a clear separation of pedestrians and vehicles on this route and take other measures to improve pedestrian safety as detailed in the transport section below.

37 The proposed pedestrian and cycle access route from the site to West Harrow station will improve local connections and is strongly supported. As per the transport comments below, the delivery of this new route should be clarified and appropriately secured.

#### Residential quality

38 London Plan Policy 3.5 and the Mayor's intend to publish London Plan Policy D6 promote quality in new housing provision, with further guidance provided in the Mayor's Housing SPG. The proposed units meet or exceed the London Plan and the Mayor's intend to publish London Plan minimum space standards, which is supported. Almost all

the units would be dual or triple aspect and the proposal would have no north-facing single aspect units, which is also supported. The affordable housing is well distributed through the site in six separate buildings and would have the same level of architectural quality as the market housing blocks.

### Fire safety

39 In accordance with Policy D12 'Fire safety' of the Mayor's intend to publish London Plan, the applicant should submit a fire statement, produced by a third party suitably qualified assessor. This must provide details of: the construction methods, products and materials; the means of escape for all building users; features which reduce the risk to life, including sprinklers in all apartments; access for fire service personnel and equipment; access for fire appliances; and how future modifications to the building will not compromise the base build fire safety and protection measures. This must be provided before the application is referred back to the Mayor at Stage 2. The applicant should also provide a fire evacuation lift within each building core for the evacuation of wheelchair users and other less mobile occupants. The Council should review the fire statement in consultation with building control officers.

### **Inclusive design**

40 London Plan Policy 7.2 and the Mayor's intend to publish London Plan Policy D3 seek to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum) ensuring that developments can be entered and used safely, easily and with dignity by all; are convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; and are designed to incorporate safe and dignified emergency evacuation for all building users. The applicant has provided a plan of the levels across the site that shows the site is relatively flat and there are no inclines that would be challenging for wheelchair users. However, the applicant should address the routes through the site to ensure these are fully inclusive and provide accessible cycle parking in line with the London Cycling Design Standards.

41 Policy 3.8 of the London Plan and the Mayor's intend to publish London Plan Policy D5 requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The proposal would provide 10% of homes as wheelchair accessible. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.

### **Sustainable infrastructure**

#### Air quality

42 The application is for a major development within an Air Quality Management Area. As such, in accordance with London Plan Policies 3.2 and 5.3, and 7.14 and the Mayor's intend to publish London Plan Policy SI1, an Air Quality Assessment has been provided. Policy SI1 states that this should take an Air Quality Neutral approach.

43 The development is air quality neutral and thus complies in this respect with London

Plan Policy 7.14 and the Mayor's intend to publish London Plan Policy SI1.

44 The applicant has screened out air quality impacts at existing sensitive locations as it is predicted the proposed development will lead to a net decrease in vehicle trips compared to the previous site use. However, the Transport Statement explains that the site is not operational and currently vacant. Therefore, any redevelopment would lead to an increase in vehicle trips compared with the existing baseline. As the site is located in an Air Quality Management Area and new trips exceed 100 AADT, a detailed assessment is required in order to ensure there are no adverse impacts on existing air quality.

45 In assessing air quality conditions for future occupants, the applicant has assumed no growth in traffic in the future year. A sensitivity test should be carried out assuming traffic growth (in line with TEMPro or equivalent) unless otherwise agreed with TfL and/or the Local Highways Authority. This is to account for worst-case conditions and assess compliance with London Plan Policy 7.14 and the Mayor's intend to publish London Plan Policy SI1. The applicant is advised to note technical comments on the air quality assessment provided separately. Conditions to restrict emissions during construction are recommended.

### Energy

46 In line with London Plan Policy 5.2 and Policy SI2 of the Mayor's intend to publish London Plan, the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions in accordance with the energy hierarchy. The approach proposed would achieve a 74% carbon dioxide reduction for the domestic element and a 43% reduction for the non-domestic element against 2013 Building Regulations. The carbon dioxide savings significantly exceed the targets within Policy 5.2 of the London Plan and the Mayor's intend to publish London Plan Policy SI2, which is strongly supported. The applicant should investigate and adopt further passive measures to reduce the risk of overheating, provide further detail required on the potential to connect to district heating, consider further provision of solar photovoltaic panels and provide further detail on the proposed heat pumps.

### Water

47 The site is in Flood Zone 1 and greater than 1 hectare in area. A Flood Risk Assessment (FRA) has been submitted as required under the NPPF. The FRA considers the risk of flooding from a range of sources but does not adequately address the risk of flooding due to sewers. The site is bisected by a major sewer and is in a Critical Drainage Area. The applicant should seek additional information about the performance of this sewer in a 100-year event and propose appropriate mitigation measures where necessary. As such the FRA does not comply with London Plan Policy 5.12 and the Mayor's intend to publish London Plan Policy SI12, as it does not give appropriate regard to sewer flood risk.

48 The surface water drainage for the proposed development generally complies with London Plan Policy 5.13 and the Mayor's intend to publish London Plan Policy SI13. Evidence of the calculation of greenfield runoff rate should be provided

49 The proposed development generally meets the requirements of London Plan Policy 5.15 and the Mayor's intend to publish London Plan Policy SI5. The applicant should also consider water harvesting and reuse to reduce consumption of wholesome

water across the entire development site. This can be integrated with the surface water drainage system to provide a dual benefit.

## **Green infrastructure and natural environment**

### Urban greening

50 London Plan Policy 5.10 and the Mayor's intend to publish London Plan Policy G5 state that developments should provide new green infrastructure that contributes to urban greening. Policy G5 also sets out a new Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments.

51 The applicant has calculated the UGF of the proposed development (in the DAS) as 0.4, however this calculation has been based on a site area of 1.03ha, whereas the planning statement refers to a total site area of 1.4ha. The applicant should review its UGF calculation in relation to the site area, and submit a drawing showing the location and extent of the surface cover types used to inform the UGF calculation prior to Stage 2.

### Biodiversity

52 London Plan Policy 7.19 and the Mayor's intend to publish London Plan Policy G6 state that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain.

53 The proposed development adjoins a Site of Importance for Nature Conservation (SINC). The applicant's Preliminary Ecological Appraisal does not address the potential direct and indirect impacts on this SINC, yet the Arboricultural Impact Assessment identifies that there will be trees removed from within or adjacent to the SINC. The applicant should demonstrate how the design and masterplanning of the proposed development has avoided impacts on the adjacent SINC.

54 The applicant should demonstrate how the design and masterplanning of the proposed development has avoided impacts on the adjacent SINC. Evidence that biodiversity net gain will be achieved should be provided. The applicant should also prepare and submit a detailed landscape plan for the proposed development, including a specification for the proposed soft landscaping. The landscape proposals should seek to maximise biodiversity across the site.

### Trees

55 London Plan Policy 7.21 and the Mayor's intend to publish London Plan Policy G7 are clear that development proposals should ensure that wherever possible existing trees of value are retained. The proposed development would result in the removal of 11 trees and 6 tree groups, which includes the removal of one Category A oak tree. The applicant should provide justification as to why the proposed development necessitates the removal of a Category A oak tree and provide a CAVAT assessment of the existing trees in the site boundary, the value of the trees removed, and the value of the trees proposed to demonstrate that adequate replacement is being provided.

## Transport

### Access

56 Access for both vehicles and pedestrians will remain as existing from The Ridgeway which is considered acceptable. A continuous footway should be provided across this access to serve pedestrian movement along The Ridgeway.

57 The pedestrian route adjacent to the central green space is only 1.8 metres wide. This footway serves a key pedestrian desire line between the Ridgeway and West Harrow underground station and should be increased to at least 2 metres in line with the preferred minimum outlined within TfL's Streetscape Guidance: <http://content.tfl.gov.uk/streetscape-guidance-.pdf>. This is especially important in the context of social distancing. The applicant should also clarify the widths of the other pedestrian footways proposed throughout the site.

### Transport assessment

58 The Transport Assessment provided has followed recently published guidance on adopting a Healthy Streets approach, which is welcomed. It is accepted that based on the multi-modal trip generation the additional trips generated by the scheme are unlikely to have an adverse impact upon the strategic transport network. The applicant has submitted an audit of key active travel routes in an active travel zone assessment (ATZ) from the application site to local destinations. The ATZ assessment looks at 5 key routes to destinations including the local school, GP surgery and West Harrow Underground Station. These destinations and routes are appropriate.

### Healthy Streets and Vision Zero

59 Whilst the ATZ has identified improvement measures, the applicant has not yet indicated its commitment to delivering these and should do so in order to mitigate the impacts of the development. In line with the Mayor's intend to publish London Plan Policy T4, the Healthy Streets approach should be embedded within, and in the vicinity of, new development. This includes The Ridgeway, which appears more than once as the worst part of the journey to key destinations. The ATZ has identified opportunities for improved crossings, lighting and maintenance along this road. The applicant should therefore work with Harrow Council to identify what improvements should be secured through the S106 agreement or S278 agreement as appropriate.

60 Proposals for the creation of a new pedestrian route through the site to link onto the existing footway north of the site between The Ridgeway towards West-Harrow Station are strongly supported, in line with the Mayor's intend to publish London Plan Policies T2 and D8. It is noted that only part of the proposed pedestrian link falls within the application site boundary. The applicant should clarify the extent of the new route that will be delivered through this development and the proposed maintenance arrangements.

61 Proposals to introduce wayfinding signage within and in the vicinity of the site are welcomed in line with the Mayor's intend to publish London T2. The applicant should provide a plan showing the location of the proposed signage.

### Car parking

62 The level of car parking proposed including blue badge parking complies with the Mayor's intend to publish London Plan Policy T6.1 standards, which is supported. Nevertheless, the applicant is encouraged to review and reduce the level of car parking for the D1 use, to encourage active travel. In addition, officers would support the Council in an extension of the current controlled parking zone to prevent parking overspill.

63 The applicant should confirm that that provision for electric or other ultra-low emission vehicles will be provided for community use parking in line with the Mayor's intend to publish London Plan Policy T6. A Parking Design and Management Plan has been produced and the measures proposed to manage and enforce parking provision are supported.

### Cycle parking

64 The quantum of long stay cycle parking complies with the Mayor's intend to publish London Plan Policy T5 minimum standards which is welcomed. An additional short-stay space for the residential and D1 usage is required to comply with Policy T5. Clarification is required regarding the designation of the cycle parking spaces and building usage. Short stay cycle parking within the public realm should also be clearly marked on plans.

65 The submitted plans do not yet provide enough details regarding the quality of the cycle parking against the London Cycle Design Standards. Dimensions for aisle, corridor and door widths as well as stand types should be provided. This is an accessibility requirement and should be provided to comply with the Mayor's intend to publish London Plan Policy T5. The applicant is strongly encouraged to provide shower and changing facilities for staff that commute to/from the community use in accordance with the Mayor's intend to publish London Plan Policy T5. Maintenance stands and bike pumps should also be provided within each residential cycle store.

### Travel Plan

66 A framework travel plan has been produced in line with TfL guidance. Targets and measures within it are aligned with the Mayor's Transport Strategy mode shift target for London, which is supported. The final Travel Plan should be secured within the S106 agreement.

### Delivery and servicing

67 An outline Delivery and Servicing Plan (DSP) has been produced in line with TfL guidance, which is welcomed, and should be secured by condition. An indicative figure for servicing and delivery demand is considered acceptable. It is important that active and sustainable freight solutions are encouraged for all deliveries and servicing where possible and so officers request parking spaces for cargo bikes are provided. The full DSP should include targets for reducing the number of vehicular deliveries and replacing these with active freight trips.

68 Officers are concerned with the interaction between servicing vehicles and vulnerable road users along the proposed servicing route. Clarification on the delineation of pedestrian routes adjacent to the servicing routes is required and demarcated routes for

pedestrians should be provided here to avoid a conflict of use and safety concerns arising, especially for those with visual impairments.

### Construction

69 An outline Construction Logistics Plan (CLP) has been produced in line with TfL guidance which is welcomed. Officers recommend that construction operations are reviewed in accord with national Site Operating Procedures issued in March 2020 by Government. Traffic marshalling and vehicle access arrangements should also be reviewed to enable pedestrians and cyclist to safely social distance, and to take account of the Mayor's new Streetspace Plan. A full CLP should be prepared in accordance with TfL's guidance and secured by condition.

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

70 Harrow Council officers are currently reviewing the application. A committee date for the application has not yet been set.

### **Legal considerations**

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

### **Financial considerations**

72 There are no financial considerations at this stage.

### **Conclusion**

73 London Plan and the Mayor's intend to publish London Plan policies on social infrastructure; housing; affordable housing; design; inclusive design; sustainable infrastructure; green infrastructure; and transport are relevant to this application. Having regard to these policies the application complies with some of these policies but not with others as per the schedule below:

- **Principle of development:** The applicant should provide further details on the community floorspace to show that it has been designed to meet the needs of a GP surgery. This brownfield site is an optimal location for residential development and the proposed residential units are strongly supported.
- **Housing:** 40% affordable housing by habitable room and unit is proposed is

proposed split 60%/40% affordable rent/intermediate. This offer exceeds the 35% threshold for the Fast Track Route and is strongly supported. Grant funding must be investigated and further detail on the affordable rent levels and the intermediate housing income thresholds should be provided before the proposal can be considered under the Fast Track Route. An early stage review must be secured. None of the low-cost rent housing would be family-sized; the applicant should consult with the Council on increasing this provision to reflect local need.

- **Urban design:** More prominent architecture and signage around the entrance to the GP surgery to aid wayfinding should be considered. Further urban greening to obscure the remaining area of inactive frontages, should also be considered. The drawings should be revised to show a clear separation of pedestrians and vehicles on the central route through the site.
- **Inclusive design:** The applicant should address the routes through the site to ensure these are fully inclusive and provide accessible cycle parking in line with the London Cycling Design Standards. The Council should secure M4(2) and M4(3) requirements by condition.
- **Sustainable infrastructure:** The development is air quality neutral; however, a detailed air quality assessment is required in order to ensure there are no adverse impacts on existing air quality. The applicant should investigate and adopt further passive measures to reduce the risk of overheating, provide further detail required on the potential to connect to district heating, consider further provision of solar photovoltaic panels and provide further detail on the proposed heat pumps. The FRA should be revised as it does not give appropriate regard to sewer flood risk.
- **Green infrastructure and natural environment:** The UGF calculation has been based on a site area of 1.03ha, below the total site area of 1.4ha. The applicant should review its UGF calculation in relation to the site area, and submit a drawing showing the location and extent of the surface cover types used to inform the UGF calculation. Further information on how proposed development has avoided impacts on the adjacent SINC and evidence that biodiversity net gain will be achieved is required. A detailed landscape plan for the proposed development is required. The removal of the Category A oak tree should be justified and a CAVAT assessment of the existing trees in the site boundary, the value of the trees removed, and the value of the trees proposed is required.
- **Transport:** The development is generally acceptable in strategic transport terms. Improvements to the width and safety of pedestrian routes through the site are required and cycle parking should meet the London Cycling Design Standards. Appropriate conditions and obligations should also be secured.

## APPENDIX 6: Daniel Watney Covering Letter – Summary of Key Changes

Date  
15 March 2021

Selina Hotwani  
West Area Team  
Regeneration, Enterprise and Planning  
4th Floor, North Wing  
Civic Centre, Station Road  
Harrow, HA1 2XY

**By Email Only**

Dear Selina,

## **265 Ridgeway: Application for Full Planning Permission Ref. P/1492/20**

### **Response to Consultation**

On behalf of our client and the applicant for planning application P/1492/20, the Harrow Gospel Hall Trust, please find enclosed a response to the statutory and public consultation period alongside formal submission of updated plans and revisions to application documents ahead of determination of the planning application.

This letter is drafted to accompany formal revisions made to planning application P/1492/20 following the statutory and public consultee comments received by stakeholders, since the application was submitted in May 2020.

Accompanying this covering letter are a series of formal revisions to the plans, alongside additional surveys and assessments undertaken to respond to the consultation process. This letter clarifies the revisions that have been made to the plans and the reasoning behind those changes, as well as providing some direct responses to other consultation responses raised.

The following documents are submitted alongside this letter:

15256 - A - (03) – 100-01 - Site Location Plan  
15256 - A - (03) – 210-01 - Proposed Site Block Plan;  
15256 - A - (03) – 211-01 - Proposed Ground Floor Plan;  
15256 - A - (03) – 212-01 - Proposed Block A Floor Plans;  
15256 - A - (03) – 213-01 - Proposed Block B Floor Plans;  
15256 - A - (03) – 214-01 - Proposed Blocks C, D and E Ground Floor Plan;  
15256 - A - (03) – 215-01 - Proposed Blocks C, D and E First Floor Plan;  
15256 - A - (03) – 216-01 - Proposed Block C Ground - Second Floor Plan;  
15256 - A - (03) – 217-01 - Proposed Block C Third - Fifth Floor Plan;  
15256 - A - (03) – 218-01 - Proposed Block C Sixth to Roof Plan;  
15256 - A - (03) – 219-01 - Proposed Block D Ground - Second Floor Plan;  
15256 - A - (03) – 220-01 - Proposed Block D Third - Fifth Floor Plan;  
15256 - A - (03) – 221-01 - Proposed Block D Sixth to Roof Plan;  
15256 - A - (03) – 222-01 - Proposed Block E Ground - Second Floor Plan;  
15256 - A - (03) – 223-01 - Proposed Block E Third - Roof Plan;  
15256 - A - (03) – 226-01 - Proposed Block G Ground - First Floor Plan;

15256 - A - (03) – 227-01 - Proposed Block G Second - Third Floor Plan;  
 15256 - A - (03) – 231-01 - Proposed Block H Floor Plans;  
 15256 - A - (03) – 232-01 - Proposed Block J Ground - First Floor Plan;  
 15256 - A - (04) – 102-01 - Proposed Site Sections;  
 15256 - A - (05) – 100-01 - Proposed Site Elevations  
 15256 - A - (05) – 101-01 - Proposed Site Elevations  
 15259 - A - (05) - 108 -01 – Proposed Site Elevations  
 15259 - A - (05) – 110-01 - Houses - Proposed South Bay  
 15259 - A - (05) – 117-01 - Block J - Proposed South-West Bay  
 15259 - A - (05) – 118-01 - Block J - Proposed South-East Bay  
 LN00582-L-100-05 – Landscape GA Plan – GF;  
 LN00582-L-101-03 – Illustrative Landscape GA;  
 LN00582-L-102-01 – Illustrative Landscape Roof Plan;  
 LN00582-L-200-06 – Hardworks Plan – GF;  
 LN00582-L-201-03 – Hardworks Softworks Podiums;  
 LN00582-L-400-05 – Softworks Plan – GF;  
 LN00582-L-500-02 – Landscape Sections;  
 LN00582-L-650-02 – Typical Raised Planter Detail on Podium  
 LN00582 – Urban Greening Factor Rev 2  
 Application Forms, including certification;  
 CAVAT Assessment;  
 Ecological Impact Assessment;  
 Design and Access Statement Addendum  
 Energy Statement Addendum-01;  
 Energy Memo – GLA consultation;  
 GLA Carbon Reporting Spreadsheet;  
 Fire Statement;  
 Flood Risk and Drainage Strategy – Updated September 2020;  
 Flood Risk and Drainage – 2331 GLA Response Letter;  
 Flood Risk and Drainage – 2331 Drainage Officer Response Letter;  
 Transport Response – Rev B  
 Financial Viability Assessment;

Clarity over how these revisions relate to the originally submitted documents, and the plans and assessments to substitute previous iterations, is provided at the end of this letter.

### Summary of Changes Made

Several changes to the scheme have been made following comments received since the planning application was submitted. These are summarised briefly below before being addressed in greater detail latterly in this letter and in the accompanying documentation:

- Significant re-design of the key landscaping strategy following comments received from the Council's landscaping and biodiversity officers, the GLA and local residents. The rear gardens of the houses on the north eastern boundary have been pulled inwards to provide a 1.5m dedicated strip for meaningful planting on the boundary between the development and the allotments. This will be fenced off appropriately from the gardens and therefore will not be subject to individual households discretion, but would be a corridor dedicated for biodiversity.
- Revisions have been made to the landscaping and planting strategy across the entire site, at both ground floor level and at roof level, in order to improve the biodiversity across the site, coordinating the landscaping with the water attenuation and ecology strategies, and improving the quality of space for future users of the site;
- The doctor's surgery has been designed based around the Department of Health – Health Building Note Guidance which sets out general zoning principles and space requirements.
- Further documents and assessments have been provided and submitted including a Financial Viability Assessment, a Fire Statement, additional Energy Documents, and a CAVAT assessment.

These changes have necessitated various amendments to the floorplans and elevations which are picked up in the revisions. The following sections discuss the principal statutory

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consultation comments that were received and addresses how the scheme has been revised accordingly to respond to the comments. Alternatively where relevant, greater clarity has been provided on the detail that was originally submitted to address the comments raised.

Appended to this letter is a response to the key themes of the public consultation responses to provide information on where the scheme has been revised to address local concerns, or where we have provided greater clarity on the originally submitted proposals to address these comments. There is some overlap between responses to the statutory consultees and the local stakeholders so both elements should be read together.

## **Response to Statutory Consultees and the Council**

### ***Biodiversity***

Following the extensive comments received from the Council's biodiversity officer as well as several responses from local residents regarding the ecological value of the site, an Ecological Impact Assessment (EclA) has been undertaken by ECOSA and submitted alongside the revisions.

The Assessment aligns with the detailed changes to the landscaping strategy which have been informed by the ecologists at ECOSA to ensure that planting across the site and at its boundary edges are more suitable for the level of biodiversity expected across the site. The EclA followed a series of updated site surveys and assessments to understand if any protected species were present on site which concluded the following:

- During a bat survey carried out at the site, no bats were recorded emerging from the buildings on site;
- The site has been assessed as supporting foraging and commuting bats and having suitability to support badger, small numbers of breeding birds and European hedgehog, but the surveys undertaken conclude no evidence of foraging or resident badger or any evidence of hedgehog;
- A small population of slow-worm has been confirmed as being present at the site and confined to the north-east corner within an area of ephemeral habitats and garden waste.

Following the surveys and as outlined in the EclA, mitigation and compensation measures are proposed which will include protection of the boundary habitat including the adjacent SINC by preparing a Construction Environmental Management Plan (CEMP), a sensitive lighting strategy, native species planting including green roofs, and sensitive timings and working methods during construction.

### ***Recommended mitigation measures***

On-site enhancement measures will include removal of the invasive Japanese knotweed along the northern boundary, the creation of two log piles within the proposed naturalistic area and the installation of bat roost units and bird nest boxes. A minimum of 20 new integral bat roost units, such as Habibat Bat Box (or similar) will be installed within new dwellings facing outwards at a minimum height of four metres.

A minimum of 20 swift nest boxes such as WoodStone Build-in Swift Nest Box B or similar bird nest boxes will be installed within new buildings. Additionally, four WoodStone Build-in Open Nest Boxes, or a similar alternative, will be installed within the building. A range of bird boxes should also be erected within the SINC, these should include a range of hole and open fronted boxes.

Off-site contributions are also suggested through the Ecological Impact Assessment, including the removal of the Japanese knotweed which is present in the SINC which is within the ownership of the London Borough of Harrow. In addition, an annual removal of rubbish from the SINC during the course of the management of the green spaces within the development is proposed to be carried out in order to improve the biodiversity value of the SINC.

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All of these mitigation and compensatory measures can be agreed via planning condition and section 106 obligations to ensure they are provided through the development.

### **Trees, Landscaping and Drainage**

LB Harrow's tree officer and the GLA requested the justification for the removal of the Category A Oak tree, identified as T8 in the arboricultural impact assessment submitted with the planning application.

The scheme evolved through substantial pre-application engagement with LB Harrow's planning, design and landscape officers including 11 pre-application meetings and two design review panels. This extensive engagement considered the most appropriate design response and challenged the architects to review all possible scenarios as to how the scheme could come forward. The scheme submitted with the planning application was considered the most preferable arrangement by the Applicant but also the Officer team taking into account the scheme as a whole and wider site context.

As detailed in the planning application documents, there is a Thames Water sewer running through the centre of the site which contains an easement prohibiting built development on this central part. This focuses development away from the central spine which also provides a natural landscaped route through which has been maximised.

Retaining T8 would however necessitate the removal of the entire Block E in the south-eastern corner which would take 25 residential units out of the scheme. It is clear from the Financial Viability Assessment submitted with these revisions that such an approach would render the scheme unviable to be delivered. Alternatively, the scheme would need to be revised to place additional height across the site in order to redistribute the units that would be lost. As discussed above, the scheme submitted at planning application stage was a result of significant pre-application engagement and design critique to ensure that the layout was the optimal solution for the site. Increasing the height on the houses and maisonettes, or switching these to apartment blocks, would not be compatible with the design approach of lowering the height to the more sensitive boundaries with the allotments.

In addition, a CAVAT assessment has been undertaken by Bartlett Tree Experts and is attached.

There is an extensive replanting programme proposed by the scheme which seeks to replace approximately 35 trees to be removed (majority of low / average value) with a total of 94 new trees across the site, including 81 within the ground floor of the site and a further 13 trees at podium level.

Tree protection measures are detailed within Section 6 of the Arboricultural Impact Assessment undertaken by MacIntyre Trees and originally submitted with the application. This includes measures including timing of removal of trees and stumps, the erection of fencing and how this is fixed, signage and exclusion zones, as well as inductions for site operatives during the construction period. Notwithstanding, we would expect detailed protection measures to be conditioned as part of any future planning permission on the site.

There are several updates and enhancements to the landscape proposals taking on board comments from ecologists in relation to plant species, from transport consultants in respect of path widths and cycle parking and from civil engineers in regards to drainage and water storage.

As part of the drainage strategy, a rainwater attenuation tank to the site has been introduced in front of Block G which required the relocation of several proposed Hawthorn trees away from the footpath edge into the lawn area. The number of trees remained unchanged, simply relocated.

The previous pond/ Suds area has been designated as a water infiltration area and will serve as an additional compensation area to safely distribute rainwater into the ground. Following the guidance given by the ecologist, this area will be planted with a grass and wildflower mix plus additional native species and framed with a low native shrub mix border.

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The landscaping proposals include site sections showing the location of the attenuation tank and infiltration area whilst these are accompanied by detailed planting schedules.

Along the north-eastern site boundary facing the allotments a 1.5m wide native hedgerow will be planted to demarcate the boundary line, provide screening, replace previous shrubs and create a valuable new habitat. This hedgerow consists of 8 native trees including a mix of *Betula pendula*, *Acer campestre*, *Prunus ssp* and *Malus sylvestris*, alongside shrubs and an understory planting of native herbaceous plants recommended by the ecologist. The planting will be separated from the gardens by a metal fence (matching metal balustrading of the proposed architecture), which allows light for the plants to grow and thrive and for species to move freely through this corridor.

Following advice from the ecologists, several plants species were changed across the site, replacing non-native trees with native species and generally including more native species into the different plant mixes throughout.

Further information has also been provided on the podium gardens including sections and planter details and build-ups, whilst additional biodiverse roofs are now shown on top of the mews houses.

The Urban Greening Factor has been recalculated to take into account the additional green roofs, non-permeable surfaces and tree canopies based on the latest changes to the calculation methods of the 2021 London Plan, with a score of 0.4 achieved across the site. Following advice from the transport consultant in response to comments received from the GLA, the footpath width along Blocks G and F has been widened from 1.8m to 2m. Additional visitor cycle parking has been provided on site, in front of the block D use and to the East boundary of the site.

#### **Secured by Design**

Following receipt of comments from the Secured by Design officer, the scheme has been revised to address these concerns and respond to some comments to provide greater clarity:

- The detailed landscape plans now show the provision of two raised tables on the roads within the site to provide natural traffic calming within the development;
- With regards to providing natural surveillance to the south-east corner, ground floor dwellings to Block E directly overlook this area along with the flatted accommodation above with habitable rooms facing the footpath connection towards the station in order to maximise natural surveillance in this corner of the site;
- All individual ground floor accommodation with private access have recessed doorways of 600mm in line with SBD principles. They will also all be well lit and those in more exposed areas are accessed via gated, private defensible space. Flatted core entrances recessed more than 600mm are fully glazed, will be well lit and overlooked. All of these items regarding materials and lighting can be refined through the discharge of condition and when applying for SBD accreditation following the grant of permission;
- In respect of potential void areas, indicative secure fencing has been shown to the maintenance area behind flatted Blocks C, D and E, the exact location, height and nature of which can be secured by condition and included within the SBD accreditation;
- No undercroft areas are shown in the submitted application. Podium car parking is fully enclosed and gated with resident only access.
- The ribbed brickwork shown to Blocks F and G would not project sufficiently to allow climbing. Any hit and miss brickwork shown stops with a large distance before the podium level so access via the brickwork would not be possible.

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### **Viability / Affordable Housing**

The application was submitted on the basis of a 40% affordable housing offer, however the Council's consultation response suggested the offer would not be supported due to the high level of 1 and 2 bed provision within the affordable elements. As a result of this request, the Applicant commissioned a Financial Viability Appraisal to understand the implications of whether the scheme could viably deliver a change in mix and tenure.

The FVA prepared by BNP Paribas and submitted alongside these revisions concludes that the scheme is unable to viably deliver any affordable housing on the site when taking into account an assessment of benchmark land value, construction costs and sales values.

It is acknowledged that this FVA will be assessed by both the Council's appointed viability assessor and the GLA's internal team.

### **Energy**

In response to comments received from the GLA and the Council's energy officers, additional documents have been prepared by Mecserve and are submitted alongside these revisions. The GLA requested that the Applicant investigates and adopts further passive measures to reduce the risk of overheating, provide further detail required on the potential to connect to district heating, consider further provision of solar PV panels and provide further detail on the proposed heat pumps.

These matters are considered in the documents accompanying these revisions prepared by Mecserve.

### **D1 Use**

Comments received from both LB Harrow planning policy officers and the GLA request further information and policy justification on the potential D1 use including updates on discussions with local providers, detailed floorplans and a demonstration as to how the space would meet local needs.

The Planning Statement-Rev B submitted in June 2020 clearly assesses the local need which identifies that the five most local GP surgeries to the development currently have more patients enrolled than the best practice ration of 1 GP per 1,800 patients. The local need, in respect of Policy DM46 is therefore clearly justified.

Additional information included within these revisions principally relates to the detailed design of the D1 building which is identified within the Design and Access Statement Addendum. The general arrangement has been designed around the Department of Health – Health Building Note Guidance, which sets out general zoning principles. The majority of the consultation rooms have been retained at ground level for accessibility purposes with the key staffing spaces at first floor level.

In addition, the FVA undertaken for the site includes a recognition that this space would be leased to the NHS at a discounted rent level for use as a GP practice which is important to ensure that the facility is delivered as affordable according to the CCG. The Applicant expects there to be a detailed commitment either through planning condition or the section 106 agreement to fit out the space as part of the implementation of the scheme rather than simply provide the shell and core.

Previous discussion with Officers have confirmed that having an end-user signed up at this stage was not an explicit requirement, however the measures above ensure that the space has been designed and earmarked for occupation by the NHS to provide a doctors surgery, which can be further secured through the section 106 agreement and / or planning conditions.

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### **Fire Statement**

The GLA at Stage 1 requested that a Fire Statement is provided in line with the now adopted Policy D12. This has been completed by Jensen Hughes and is submitted alongside these revisions.

### **Air Quality**

The GLA Stage 1 report recognises that the development is air quality neutral as identified in the Air Quality Assessment and that this complies with the now adopted Policy S11 of the London Plan. However the report also suggests that as the site is not operational, any redevelopment would lead to an increase in vehicular trips when compared with the existing baseline and that further assessments are necessary.

Whilst the site is not currently operational, the baseline is fundamental to consider as there are no restrictions on the site re-opening immediately in line with the existing lawful use as religious meeting hall. The building is currently vacant due to the ongoing planning application process however there would be nothing stopping the existing landowner, or an alternative religious operator from re-opening the site tomorrow and benefitting from unfettered access to the site with the 250 car parking spaces. There are no conditions attached to planning permission WEST/321/97/FUL which would prohibit the access to the site or indeed its use on any days or at any particular time.

The Transport Assessment identified that when compared with the existing use, the proposed development would result in an overall decrease in daily vehicle trips by 94 and 8 less total person trips also on a daily basis. This has been carried over into the assessment into Air Quality undertaken by RSK which states that the scheme would not have a significant adverse effect on air quality due to the net reduction in vehicular trips and no further detailed assessments are required.

The modelled results indicate that the pollutant concentrations in the local area are well below the relevant air quality objectives and therefore the assessment concluded the traffic generated by the development would not cause significant air quality impacts on existing receptors. Reviewing the relevant requirements of Policy S11 of the London Plan, Part (B1) requires development proposals to not:

- a) Lead to further deterioration of existing poor air quality;
- b) Create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits;
- c) Create unacceptable risk of high levels of exposure to poor air quality.

It is clear from the Air Quality Assessment submitted with the planning application that based on the robust and justifiable position relating to trip generation and vehicular movements, that there would be no significant effects on air quality as a result of the proposals that would cause any non-compliance with Part B1 of Policy S11.

Part B2 of the Policy requires:

- a) Development proposals to be at least Air Quality Neutral;
- b) Development proposals to use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality;
- c) Major development proposals to be submitted with an Air Quality Assessment to show how the development meets the requirements of B1;
- d) Development proposals in Air Quality Focus Areas should demonstrate that design measures have been used to minimise exposure.

Again, the Air Quality Assessment submitted with the original planning application identifies that the proposals would be air quality neutral and that further mitigation measures are not required, other than for appropriate planning conditions to reduce the potential of dust emissions during the construction phase which would further satisfy Part (D) of Policy S11.

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In respect of the final criteria of Policy SI1, Part (E) requires development proposals to ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral, this is done on-site. As discussed above, it is evident from the Air Quality Assessment that the proposals already satisfy the air quality neutral requirements and therefore no further mitigation measures are required on or off site.

### Planning Application Documents

For clarity, we list below the plans and documents that the application should currently be considered on. Where revisions or additional documents have been prepared to accompany this letter, they have been identified in **bold**.

**15256 - A - (03) – 100-01 - Site Location Plan**  
 15256 - A - (03) - 101 - Existing Site Plan  
**15256 - A - (03) – 210-01 - Proposed Site Block Plan;**  
**15256 - A - (03) – 211-01 - Proposed Ground Floor Plan;**  
**15256 - A - (03) – 212-01 - Proposed Block A Floor Plans;**  
**15256 - A - (03) – 213-01 - Proposed Block B Floor Plans;**  
**15256 - A - (03) – 214-01 - Proposed Blocks C, D and E Ground Floor Plan;**  
**15256 - A - (03) – 215-01 - Proposed Blocks C, D and E First Floor Plan;**  
**15256 - A - (03) – 216-01 - Proposed Block C Ground - Second Floor Plan;**  
**15256 - A - (03) – 217-01 - Proposed Block C Third - Fifth Floor Plan;**  
**15256 - A - (03) – 218-01 - Proposed Block C Sixth to Roof Plan;**  
**15256 - A - (03) – 219-01 - Proposed Block D Ground - Second Floor Plan;**  
**15256 - A - (03) – 220-01 - Proposed Block D Third - Fifth Floor Plan;**  
**15256 - A - (03) – 221-01 - Proposed Block D Sixth to Roof Plan;**  
**15256 - A - (03) – 222-01 - Proposed Block E Ground - Second Floor Plan;**  
**15256 - A - (03) – 223-01 - Proposed Block E Third - Roof Plan;**  
 15256 - A - (03) - 224 - Proposed Block F Ground - First Floor Plan  
 15256 - A - (03) - 225 - Proposed Block F Second - Roof Plan  
**15256 - A - (03) – 226-01 - Proposed Block G Ground - First Floor Plan;**  
**15256 - A - (03) – 227-01 - Proposed Block G Second - Third Floor Plan;**  
 15256 - A - (03) - 228 - Proposed Block G Roof Plan  
 15256 - A - (03) - 229 - Proposed House Type A Floor Plans  
 15256 - A - (03) - 230 - Proposed House Type B Floor Plans  
**15256 - A - (03) – 231-01 - Proposed Block H Floor Plans;**  
**15256 - A - (03) – 232-01 - Proposed Block J Ground - First Floor Plan;**  
 15256 - A - (03) - 233 - Proposed Block J Second - Roof Plan  
**15256 - A - (04) – 102-01 - Proposed Site Sections;**  
 15256 - A - (04) - 103 - Proposed Detailed Sections  
 15256 - A - (04) - 104 - Proposed Detailed Sections  
**15256 - A - (05) – 100-01 - Proposed Site Elevations**  
**15256 - A - (05) – 101-01 - Proposed Site Elevations**  
**15259 - A - (05) - 108 -01 – Proposed Site Elevations**  
 15257 - A - (05) - 102 - Proposed Detailed Elevations Block C  
 15257 - A - (05) - 103 - Proposed Detailed Elevations Block C  
 15258 - A - (05) - 104 - Proposed Detailed Elevations Block D  
 15258 - A - (05) - 105 - Proposed Detailed Elevations Block D  
 15259 - A - (05) - 106 - Proposed Detailed Elevations Block E  
 15259 - A - (05) - 107 - Proposed Detailed Elevations Block E  
**15259 - A - (05) – 110-01 - Houses - Proposed South Bay**  
 15259 - A - (05) - 111 - Block F - Proposed South Bay  
 15259 - A - (05) - 112 - Block G - Proposed South-West Bay  
 15259 - A - (05) - 113 - Block A - Proposed North-East Bay  
 15259 - A - (05) - 114 - Block C - Proposed South-East Bay  
 15259 - A - (05) - 115 - Block D - Proposed North-West Bay  
 15259 - A - (05) - 116 - Block E - Proposed North-East Bay  
**15259 - A - (05) – 117-01 - Block J - Proposed South-West Bay**  
**15259 - A - (05) – 118-01 - Block J - Proposed South-East Bay**  
**LN00582-L-100-05 – Landscape GA Plan – GF;**  
**LN00582-L-101-03 – Illustrative Landscape GA;**

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 Daylight and Sunlight Assessment;  
 Delivery and Servicing Plan;  
 Design and Access Statement;  
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 Draft Travel Plan;  
 Energy and Sustainability Statement;  
**Energy Statement Addendum-01;**  
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**GLA Carbon Reporting Spreadsheet;**  
**Fire Statement;**  
**Flood Risk and Drainage Strategy – Updated September 2020;**  
**Flood Risk and Drainage – 2331 GLA Response Letter;**  
**Flood Risk and Drainage – 2331 Drainage Officer Response Letter;**  
 Landscape Design Report;  
 Noise Impact Assessment;  
 Overheating Assessment;  
 Planning Statement-Rev B;  
 Preliminary Ecological Appraisal;  
 Preliminary Risk Assessment;  
 Statement of Community Involvement;  
 Transport Assessment;  
**Transport Response – Rev B**  
 Utilities and Services Report;  
**Financial Viability Assessment;**

We trust that the enclosures and attachments are self-explanatory, however, if you have any queries please do not hesitate to contact the relevant members of the Daniel Watney team.

Yours sincerely,

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