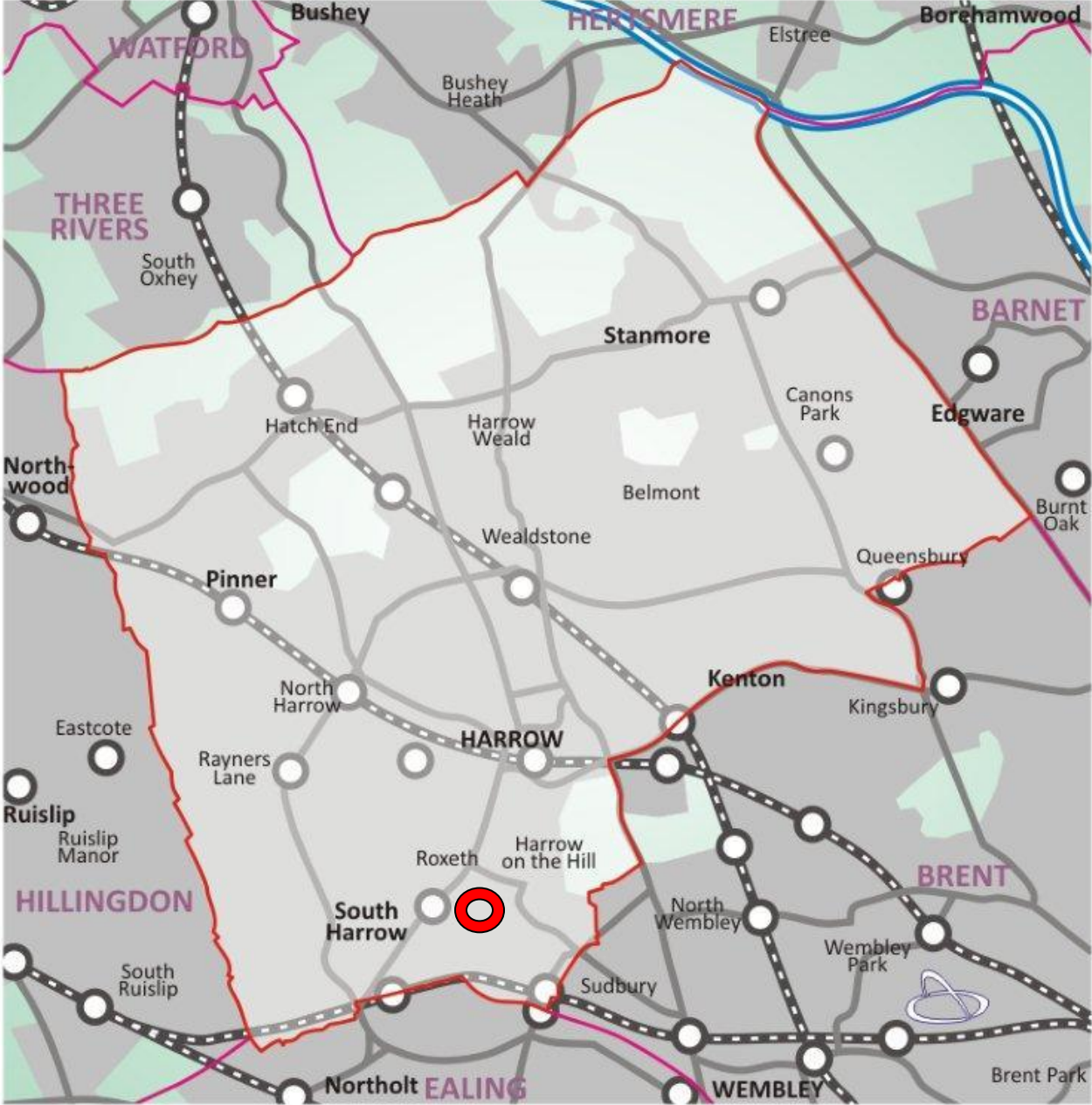


 = application site



59-65 The Heights, Lowlands Road	P/4901/21
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LOCATION PLAN



LONDON BOROUGH OF HARROW

PLANNING COMMITTEE

20th JULY 2022

APPLICATION NUMBER: P/4901/21
VALIDATE DATE: 26 JANUARY 2022
LOCATION: 59-65 The Heights, Lowlands Road, Harrow
WARD: GREENHILL
POSTCODE: HA1 3AW
APPLICANT: MS EVA SISKINOVA
AGENT: DANDI LIVING LTD
CASE OFFICER: SELINA HOTWANI
EXPIRY DATE: 27 JULY 2022

PROPOSAL

Five storey front extension comprising of thirty two shared living units (Use Class Sui Generis); replacement of windows to front elevation; landscaping

The Planning Committee is asked to:

RECOMMENDATION A

- 1) Agree the reasons for approval as set out in this report, and
- 2) Grant planning permission subject to authority being delegated to the Interim Chief Planning Officer in consultation with the Director of Legal and Governance Services for the completion of the Section 106 legal agreement and other enabling legislation and issue of the planning permission and subject to minor amendments to the conditions (set out in Appendix 1 of this report) or the legal agreement. The Section 106 Agreement Heads of Terms would cover the following matters:

- 1. Tenure and Management**

- Tenure and Management Strategy.

- 2. Affordable Housing Contribution and Viability Review**

- Commuted Sum - £160,000
- To pay the affordable housing contribution prior to the commencement of development
- Early and Late Stage Review

- 3. Carbon Offset**

- Requiring payment of the carbon offset contribution ((£22,610)) prior to commencement of development.
- Post-construction assessment to determine if the proposed carbon reductions have been achieved and whether an additional carbon offset

contribution (residential element) is required to offset any shortfall, calculated at £1,800 per tonne of carbon.

4. Energy Centre

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

5. Highways and Parking Travel Plan Monitoring

- Baseline Survey to be completed prior to commencement of development and surveys to be conducted in year 1, 3 and 5 of the development, following the baseline survey.
- Submission of financial costs associated with the Travel Plan are to be provided by the developer.
- Submission of an updated Travel Plan based on the framework travel plan prior to occupation and to cover an initial monitoring period of 5 years.
- 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.
- Appointment of a travel plan co-ordinator.

Permit Restriction

- Parking permits for the surrounding CPZ
- Contribution of £1500 to amend the relevant traffic management order. This is necessary in order to minimise the possibility of overspill parking onto the surrounding roads and also encourage sustainable travel.

6. Employment and Training - Construction Employment

- The developer to submit to the Council for approval, prior to commencement of the development, a Training and Recruitment Plan/ Local Labour Employment Strategy. The developer to implement the agreed Plan. The training and Employment plan will include:
 - a) employment initiatives opportunities relating to the construction of the Development and details of sector delivery;
 - b) the provision of appropriate training with the objectives of ensuring effective transition into work and sustainable job outcomes;
 - c) the timings and arrangements for implementation of such initiatives and
 - d) suitable mechanisms for the monitoring of the effectiveness of such initiatives
- The developer to use all reasonable endeavours to secure the use of local suppliers and apprentices during the construction of the development.
- A financial contribution towards the management and delivery of the construction training programme based on the construction value of the development. This is calculated using the formula: £2,500 per £1,000,000 build cost.

7. Legal Costs and Monitoring Fee

- Legal fees: A financial contribution (to be agreed) to be paid by the developer to the Council to reimburse the Council's legal costs associated with the preparation of the planning obligation.
- Planning Administration Fee: Payment of £1580 administration fee for the monitoring and compliance of the legal agreement

RECOMMENDATION B

That if, by **27th October 2022** or such extended period as may be agreed in writing by the Interim Chief Planning Officer, the section 106 Planning Obligation is not completed, then delegate the decision to the Chief Planning Officer to **REFUSE** planning permission for the following reason.

1. The proposed development, in the absence of a Legal Agreement to provide appropriate improvements, benefits and monitoring that directly relate to the development, would fail to adequately mitigate the impact of the development on the wider area and provide for necessary social, environmental and physical infrastructural improvements arising directly from the development, contrary to the National Planning Policy Framework (2021), policies D2, E10, SI2, SI3, and DF1 of The London Plan (2021), policy CS1 of the Core Strategy (2012), AAP9 of the Harrow and Wealdstone Area Action Plan (2013), policies DM1, DM13, DM34, and DM50 of the Harrow Development Management Policies Local Plan and the Supplementary Planning Document: Planning Obligations & Affordable Housing (2013).

REASON FOR THE RECOMMENDATIONS

The proposed development would bring forward housing provision of a satisfactory layout and design to ensure that the future occupiers would benefit from a high standard of living accommodation. It is considered that the proposed building would have an acceptable design and external appearance and would not have an undue impact on the character and appearance of the area or the residential amenity of neighbouring occupiers. Accordingly, the development would accord with development plan policies and is recommended for approval.

INFORMATION

This application is reported to Planning Committee as it would result in a development of more than 400 sqm of non-residential floorspace. The application is therefore referred to the Planning Committee as it does not fall within any of the provisions set out at paragraphs 1(a) – 1(h) of the Scheme of Delegation dated 12th December 2018.

Statutory Return Type:	All other Largescale Major Development
Council Interest:	None
Net Floorspace:	1,602 sqm
GLA Community Infrastructure Levy (CIL) Contribution	£96,120
Local CIL requirement (provisional):	£176,220

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 Five storey building on the northern side of Lowlands Road; and lies within the boundaries of the Harrow town centre. The site is set back from Lowlands Road due to its large forecourt. Vehicle access is via Lowlands Road, with car parking located in the front forecourt and within the existing basement. The site is currently undergoing the conversion of the existing building into 125 residential units.
- 1.2 Immediately south east is 67-71 Lowlands Road, a part 4 part 5 storey office building. On the other site is 5 storey office building known as Grove House. To the rear of the site is the railway line beyond which is Harrow Town Centre. Directly opposite are two storey residential dwelling houses.
- 1.3 The site slopes downwards from front to rear but also upwards from north to south. To the rear of the property is the London Underground & National Rail Lines. The north side of Lowlands Road has an eclectic range of architectural styles, largely postmodern and of limited architectural quality, centred around office typologies.
- 1.4 The site has a public transport accessibility level (PTAL) of 6A. The site is within fluvial flood zone 3a & 3b, and Harrow's critical drainage area. The application site is within the setting of the Roxborough Park and the Grove Conservation Area. In addition, the site is located within a landmark viewing corridor from Old Redding viewpoint and within the wider setting consultation area of other protected views.

2.0 PROPOSAL

- 2.1 The application proposes a five storey front extension linked to the existing building comprising 125 residential units to deliver 32 shared living accommodation units (sui generis).
- 2.2 The basement car park would be replaced with cycle storage, refuse storage and storage for residents. It would also provide for 10 disabled parking spaces for the existing C3 use and proposed co-living use. The proposal is otherwise car-free.
- 2.3 The proposed extension would have a maximum depth of 17m from the recessed part of the front elevation closest to Grove House a 5 storey office building to the north of the site. It would be separated by 6m at its closest point to this property and by over 23m from the property on the other side (67-71 Lowlands Road).
- 2.4 The internal configuration is as follows:
- Basement:
- Waste and Recycling Store
 - Cycle store
 - Car parking for 10 blue badge holders
- Ground Floor:
- Reception Area, Office
 - Parcel Room
 - Communal Lounge / Kitchen

- 6 x co-living units including 1 x DDA

First Floor:

- 8 x co-living units including 1 x DDA unit
- Laundry Room
- Store
- Communal Lounge / Kitchen

Second Floor:

- 8 x co-living units including 1 x DDA unit
- Linen
- Store
- Communal Lounge / Kitchen

Third Floor:

- 8 x co-living units
- Linen
- Store
- Communal Lounge / Kitchen

Fourth Floor:

- 2 x co-living units;
- Lounge

2.5 Short stay and accessible cycle spaces are located adjacent to the main entrance of the building at the front. The front of the site comprises a large communal garden.

3.0 **RELEVANT PLANNING HISTORY**

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

Ref no. Description	Status and date of decision
P/3760/07 Replace two air-conditioning condensers with new units of the same size in the same location.	Granted 04/02/2008
P/2497/17/PRIOR - Conversion of offices (class b1a) to 119 self-contained flats(class c3) (prior approval of transport & highways impacts of the development contamination and flooding risks on the site and impacts of noise from commercial premises on the intended occupiers	Refused: 26/07/2017
<p><i><u>Reasons for Refusal:</u></i> 1. The proposal, by reason of the lack of legal agreement to restrict future occupiers of obtaining a Residential Parking Permit for the surrounding Controlled Parking Zone, and secure a reasonable obligation for the monitoring and remedial measures sum in relation to a revised Travel Plan, would be likely to result in detrimental highways and traffic impacts, and therefore would be contrary to Policies 6.9 & 6.13 of The London Plan (2016), and Policy DM42 of Harrow's Development Management Policies Local Plan (2013) and policies AAP 19</p>	

<p>& 20 of the Harrow & Wealdstone Area Action Plan (2013). The proposal cannot therefore be determined to be in compliance with provision O.2 (a) of the Town and Country Planning (General Permitted Development (England) Order 2015, as amended.</p> <p>2. The proposal, by reason of the overprovision of car parking, and lack of compliant parking provision for persons with disability, would be likely to result in detrimental highways and traffic impacts, and therefore would be contrary to Policies 6.9 & 6.13 of The London Plan (2016), and Policy DM42 of Harrow's Development Management Policies Local Plan (2013) and policies AAP 19 & 20 of the Harrow & Wealdstone Area Action Plan (2013). The proposal cannot therefore be determined to be in compliance with provision O.2 (a) of the Town and Country Planning (General Permitted Development (England) Order 2015, as amended.</p> <p>3. In the absence of an adequate Flood Risk Assessment containing Emergency Planning Information, insufficient information exists for the Local Planning Authority to make a determination as to whether the proposal would result in potential unacceptable risks and impact in terms of flood risk on the future occupiers of the site. The proposal cannot therefore be determined to be in compliance with provision O.2 (d) of the Town and Country Planning (General Permitted Development (England) Order 2015, as amended.</p>	
<p>P/4131/17/PRIOR - Conversion of Offices (Class B1a) to 119 Self-Contained flats (class c3) (prior approval of transport & highways impacts of the development, and of contamination risks and flooding risks on the site, and impacts of noise from commercial premises on the intended occupiers)</p>	<p>Prior Approval Granted subject to conditions and legal agreement</p>
<p>P/1523/20/PRIOR - Change Of Use From Office (Class B1a) to 125 Self-contained Flats (Class C3) (Prior approval of transport & highways impacts of the development, and of contamination risks and flooding risks on the site, and impacts of noise from commercial premises on the intended occupiers)</p>	<p>Refused: 23/06/2020</p>
<p><u>Reasons for Refusal:</u></p> <p>1. In the absence of an adequate Noise Impact Assessment, insufficient information exists for the Local Planning Authority to make a determination as to whether the proposal would result in unacceptable impact in terms of noise on the future occupiers of the site. The proposal cannot therefore be determined to be in compliance with condition O.2(d) of Class O, Part 1, of Schedule 2 of The Town and Country Planning (General Permitted Development)(England) Order 2015 as amended.</p>	
<p>Change Of Use From Office (Class B1a) to 125 Self-contained Flats (Class C3) (Prior approval of transport & highways impacts of the development, and of contamination risks and flooding risks on the site, and impacts of noise from commercial premises on the intended occupiers)</p>	<p>Granted subject to legal agreement: 18/08/2020</p>
<p>P/1618/21 Redevelopment to provide part three and part four storey building with basement level comprising of cafe to ground and basement level (use class E(b)) and forty six shared living units</p>	<p>Refused on 15/12/2021</p>

<p>(HMO) to upper floors (use class Sui Generis); parking; landscaping; bin and cycle stores (demolition of existing building) (Re-consultation: Updated description)</p>	
<ol style="list-style-type: none"> 1. <i>The proposed development, due to excessive scale, poor siting and positioning in relation to the existing building ('The Heights') would result in an incongruous addition that would constitute overdevelopment of the site and represent an over-intensification of residential development on the site. The development would, therefore, not represent an appropriate high quality of design, would not maintain or enhance the character of the surrounding streetscene and the visual interests of its surroundings and fails to appropriately respect and relate to its spacious context, contrary to section 12 of the National Planning Policy Framework (2021), policy D3 (D(1) and D(11)) of The London Plan (2021) and policies AAP1, AAP4, AAP5 and AAP13 of the Harrow and Wealdstone Area Action Plan (2013) and policy DM1 of the Harrow Development Management Policies Document (2013).</i> 2. <i>The applicant has failed to provide a financial viability assessment and supporting information to demonstrate that the maximum reasonable level of affordable housing on the development site is provided. In the absence of this information, 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 (2021), policies H4 and H6 of The London Plan (2021) and core policies CS1(I) and CS1(J) of The Harrow Core Strategy (2012).</i> 3. <i>The proposed development, due to its failure to provide outside communal amenity space and a sufficient quantum and quality of internal communal space for the shared living occupiers, as well as insufficient information to demonstrate the adequate usability, function and quality of the outdoor communal garden for the residential occupiers (of 'The Heights') and insufficient implementation of 'Secured by Design' principles would fail to provide an acceptable standard of accommodation for future occupants and would fail to achieve the aspirations in the creation of inclusive, lifetime neighbourhoods, contrary to the National Planning Policy Framework (2021), policies H16, D4, D5 and D11 of The Local Plan (2021) and policies DM1, DM2 and DM22 of the Harrow Development Management Policies Local Plan (2013).</i> 4. <i>The submitted Daylight and Sunlight Report, in the absence of accurately assessing the existing site constraints pertaining to the future residents of 'The Heights' directly to the rear of the proposed development would fail to provide sufficient information to assess whether the proposal would result in an acceptable quality of accommodation for future residents with regard to natural light, daylight and overshadowing. The proposed development is therefore contrary to the high quality design aspirations of The National Planning Policy Framework (2021), policy D3(D(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).</i> 5. <i>The proposed development by virtue of its limited availability of space within the site would fail to demonstrate that opportunities for the provision of an additional seven per cent of dwellings could be provided with one designated disabled persons parking space in the future should the existing provision be insufficient. Furthermore, the proposal fails to demonstrate that the proposed delivery and servicing arrangements would not cause adverse impact to safety and traffic flow or conflict with users of the basement car park. The proposal would therefore give rise to an unsustainable development which would fail to contribute towards climate change mitigation as well as cause detrimental harm to the safety and traffic flow of future occupiers and the existing highway network, contrary to Chapter 9 of the National Planning Policy Framework (2021), policies T6, T6.1 and T7 of The London Plan (2021) and policies DM42 and DM44 of the Harrow Development Management Policies Local Plan (2013).</i> 6. <i>The proposed development, in the absence of sufficient information within the provided Preliminary Ecological Assessment to demonstrate that the proposal would</i> 	

appropriately secure net biodiversity gain and provide opportunities for local biodiversity mitigation or enhancement within the site or vicinity of the site and substantial shortfall of the recommended urban greening factor as set out in The London Plan, would fail to accord with the aspirations of the National Planning Policy Framework (2021), policies G5 A and B & G6 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).

4.0 CONSULTATION

4.1 Two Site Notices were erected on 23 February 2022 expiring on 21 March 2021.

4.2 Press Notice was advertised in the Harrow Times on the 10 March 2022 expiring on 30 March 2022.

4.3 The application was advertised as a major application.

4.4 A total of 150 notification letters were sent to nearby properties regarding this application. The public consultation period expired on 15 March 2022. 23 objections were received, most of which appeared to be from users of Grove House located to the north of the site.

4.5 Adjoining Properties

Number of letters Sent	251
Number of Responses Received	23
Number in Support	0
Number of Objections	23
Number of other Representations (neither objecting or supporting)	0

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

<p>Residential Amenity</p> <ul style="list-style-type: none"> • Block of light of 55 Lowlands Road • Blocking of view of Lowlands Road • Over crowding in small congested location • Loss of light and overshadowing of Grove House • Overlooking / loss of privacy • Noise and dust pollution • Disruption from the delivery trucks and general inconvenience of having another building site <p>Officer comments: <i>Please refer to section 6.3 of the report.</i></p>
<p>Traffic and Parking</p> <ul style="list-style-type: none"> • Undue stress on local transport and infrastructure

- Inadequate parking / loading / turning
- Potentially block drive into basement

Officer comments:

Please refer to section 6.4 of the report

4.9 Statutory and Non Statutory Consultation

4.10 The following consultations have been undertaken:

LBH Environmental Health

A noise assessment was carried for the building and for its potential occupants/surrounding areas once the development has been completed. Therefore, I have no concerns that if/once completed in accordance to specifications, risk of noise complaints from the occupants is going to be low.

However, I just had a look at the construction method statement and I'm concerned that even though they specify operating hours, they do say that on occasions there may be some work carried out outside normal operating hours- I'd say this ambiguous and contractors or delivery drivers may use it to work outside regular hours causing nuisance to the nearby residents.

Also, the issues associated with air pollution due to construction works have not been addressed in the proposal-the area is surrounded by residential properties and therefore will have an impact on residents' quality of life for the duration of proposed works.

Officer response: A revised construction method statement was provided and deemed to be acceptable.

LBH Heritage Officer

The proposal would preserve the setting of the adjacent Roxborough Park and the Grove Conservation Area and the historic locally listed buildings as there is this clear distinction between this side of Lowlands Road and the other. This side is part of the modern commercial development of the town centre.

LBH Drainage

The FRA and Drainage Strategy submitted are acceptable but full details are still required subject to conditions.

LBH Highways

Highways do not support this proposal as overall this proposal results in a lesser quality provision than was previously approved. An increase in residents and subsequent lack of opportunity to provide additional disabled parking also negatively affect the proposal. It may not result in a severe impact for the Highway network but it may be harmful if deliveries and servicing are not properly managed.

Should the application be granted, conditions for construction logistics plan, car parking design and management plan and delivery and service plan would be required.

Officer response: The plans have been amended to provide for more blue badge spaces with active charging points and included the same number of cycle spaces as previously approved.

LBH Landscape Officer

- No objections to the proposed annex extension, subject to further landscaping details.

LBH Planning Policy

No comments received

LBH Urban Design Officer

A comprehensive redevelopment of the site would have been highly preferable to the proposed extension of the existing The Heights building. The proposal is a compromised solution, not offering a significantly strengthened street frontage to Lowlands Road, providing an unbalanced massing and replicating a building of low architectural value. All three of these concerns could have been fully addressed through a comprehensive redevelopment.

Generally ok on balance however concerns relating to:

- whether residents from The Heights would be able to access the proposed extension and vice versa. This should be clarified.
- There is concern that the building will appear poorly resolved and unbalanced when viewed and approached from its street-facing elevation (Lowlands Road).
- The proposed massing, by virtue of its southern elevation alignment with Grove House, does strengthen the building line of Lowlands Road and broadly aligns with that of other buildings on the street's northern side. However, this strengthening is partial and it is highly regrettable that a comprehensive site redevelopment has not been sought which could provide a continuous, stronger building line.
- The east elevation of Grove House (55 Lowlands Road), which features many window openings, will be impacted by the proposed extension in terms of reduced daylight and sunlight to its eastern elevation and perceived overlooking and overbearing.
- It is unacceptable to provide obscured glazed windows to single aspect west-facing units to the western elevation and this is objected to. The Applicant must address overlooking to the neighbouring building to the west but must also provide a sufficient quality of living accommodation and outlook to these west-facing units.
- There is additional concern regarding reduced daylight and sunlight provision to west-facing units given the proximity to the neighbouring building. This is of significant concern and is not supported.
- The fourth-floor communal lounge is welcome but should be increased in size to offer a more generous shared space to residents. For example, by occupying the entire fourth floor.

- Despite positive moves in the external appearance of the proposed extension, this is still a less successful scheme than if the entire site was redeveloped, which would have created the opportunity for a single and continuous street-facing elevation which followed the prevailing building line. It remains highly regrettable that a comprehensive site redevelopment has not been sought, with the opportunity for a new and higher quality architectural design, as opposed to simply replicating a building of limited architectural value.

Officer response: The above comments were noted and a revised scheme has been provided to address concerns raised.

LBH Landscape Architects

No objection subject to appropriate landscape, boundary +
-
treatment, external lighting conditions.

LBH Waste Officer

The proposal appears to have a bin storage area underneath a kind of plant/garden so it is difficult to see what bins they have made allowances for etc. All appears fine.

Biodiversity

Overall, there are significant inconsistencies and gaps in the supporting information for the application and a lack of detail with regard to points of material considerations. This raises queries about the UGF and biodiversity net gain scores.

Whilst it should be possible to address these provided the relevant details can be provided it isn't presently feasible to determine the application in respect of the information submitted. Whilst it might be possible to address some of this via condition that won't be possible in all cases, e.g. with regard to whatever the applicant's green roof proposals actually vis-a-vis load-bearing tolerances and the provision of built-in shelters for bats, birds and other wildlife.

As such the applicant should resolve these points prior to determination or the application should be refused.

Economic Development Officer

Construction Training

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.

Network Management

No changes to access arrangements, no objection.

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 are set out in the table below.

Designing Out Crime Officer

No comments received

Transport for London (TfL)

Though we have no objection in principle to the above planning application there are a number of potential constraints on the redevelopment of a site situated close to London Underground infrastructure.

Therefore we request that the grant of planning permission be subject to conditions to secure the following:

The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground), have been submitted to and approved in writing by the local planning authority which:

- provide foundation and construction details on substructure including piling details
- provide details on the use of tall plant
- accommodate ground movement arising from the construction thereof
- and mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

We also ask that the following informative is added:
The applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; drainage; excavation; and construction methods

Officer response: This is noted, condition and informative added.

Conservation Area Advisory Committee (CAACs)

We have seen an application recently P/1618/21 for this site which was a much larger new build separate building in front of the office block which was also being converted under permitted development which we objected to strongly. This new application does address some of the points raised but still suffers as follows.

Other than corner units the units have a single aspect which is poor design. The units are not intended for people with the same employer or same college, and we believe that for a sense of real community in the building a mix of unit sizes is preferable. In design code language this would be a sense of place. Such mix of unit sizes would necessitate more amenity space improving the quality of the design. With small single aspect uniform units without a sense of place within a high-density development such as this risks being a future slum.

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 [LP], The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan (AAP) 2013, the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan SALP 2013 [SALP].

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

6.0 ASSESSMENT

6.1 The main issues are;

- Principle of the Development
- Design, Character and Appearance of the Area
- Residential Amenity
- Traffic, Safety & Parking
- Development and Flood Risk

- Trees, Ecology and Biodiversity
- Environmental Considerations – Contamination, Noise, Air Quality
- Land Contamination and Remediation
- Air Quality
- Fire Safety

6.2 Principle of Development

6.2.1 The relevant policies are:

- National Planning Policy Framework (2021)
- The Draft New London Plan (2019); D1, H1, H16
- Harrow Core Strategy (2012): CS1
- Area Action Plan: AAP13
- Harrow Development Management Policies Local Plan (2013): DM1

Acceptability of proposal

6.2.2 The proposed development seeks planning permission for 32 co-living units (sui generis use). To this end, the supporting planning statement states that the proposal would contribute towards the Borough's housing targets, however given that the 32 co-living units do not correlate directly into 32 net additional units it is considered that this notion is not strictly true. Indeed, Policy H1 of the London Plan (2021) states that non self-contained communal accommodation should count towards meeting the housing targets but only based on a 1.8:1 ratio. Therefore, the proposal would have a net contribution towards the borough's housing target of circa 18 net additional units. On this basis, although not strictly C3 use, the co-living units would contribute to the Borough's housing target and would therefore be an appropriate use.

6.2.3 The layout and management of co-living accommodation is unlike conventional housing and therefore does not fall within any Use Class (i.e. sui generis). It is noted that there is no national or local policy in relation to this typology, so all assessment of the acceptability of the proposal therefore falls under the Draft New London Plan (2019) (Intend to Publish Version), specifically by way of policy H16 (Large-scale purpose-built shared living). H16 is a criteria-based policy, which sets out the requirements that any proposed co-living development must comply with. This policy provides support for such a use provided, that it meets the criteria set out within it. The compliance with these criteria in terms of the accommodation and ancillary uses are considered below.

6.2.4 Policy H16 states that large scale purpose built shared living development should meet the following criteria:

- 1) It is of good quality and design;
- 2) It contributes towards mixed and inclusive neighbourhoods;
- 3) It is located in an area well-connected to local services and employment;
- 4) It is under single management;
- 5) Its units are all for rent with minimum tenancy lengths of no less than 3 Months;
- 6) Communal facilities and services are provided that are sufficient to meet the

requirements of the intended number of residents and offer at least:

- Convenient access to a communal kitchen
- Outside communal amenity space
- Internal communal amenity space
- Laundry and drying facilities
- Concierge
- Bedding and linen changing/room cleaning services

7) The private units provide adequate functional living space and layout; and are not self-contained homes or capable of being used as self-contained homes;

8) A Management Plan is provided; and

9) It delivers a cash in lieu contribution towards conventional C3 affordable housing. Boroughs should seek this contribution for the provision of new C3 off-site affordable housing as either an:

- a) upfront cash in lieu payment to the local authority, or
- b) in perpetuity annual payment to the local authority

6.2.5 The applicants have developed a number of co-living schemes including in Wembley for 368 units and 97 units in Hounslow and are currently implementing a co-living scheme in Greenhill Way, Harrow (P/1257/20). As per these developments, they have confirmed that they would be the sole managers of the proposed development. The submission is accompanied by an Operation and Management Statement. This provides further detail on the management of the building including the role of the onsite building management team, tenancy, co-living accesses and facilities.

6.2.6 Officers consider that the proposed development would be a high-quality scheme that would provide wider improvements to the streetscene, particularly given the industrial / commercial building typologies dominating by hard surface. The proposed housing product would contribute towards a mixed community and is located within the Harrow town centre boundary and therefore is in close proximity to sustainable transport modes. Furthermore, the proposed scheme would provide a satisfactory quantum of internal and external amenity space and communal facilities for the future occupiers and the minimum tenancy lengths and management plan are to be secured through the Section 106 agreement. Officers consider that the proposed co-living accommodation would therefore satisfy the requirements as set out in policy H16 of the draft London Plan (2021).

6.2.7 The proposed development would provide housing choice, particularly in the context of the residential scheme currently under construction in a highly sustainable location of Harrow, being within the Harrow Metropolitan Town Centre. Whilst there is no current demonstrable need for this housing typology within the Borough, the proposed co-living accommodation would meet an emerging need as supported within the London Plan and a planning obligation would ensure the development will be managed and maintained in a manner which would ensure the continued quality of the accommodation. The proposal would make a noteworthy contribution towards the wider policy and regeneration objectives for the heart of Harrow, including

housing and employment. Having regard to compliance with these elements of the development plan, together with other considerations in this report with respect to design, amenity, infrastructure, servicing and highways; the principle of the development is supported by officers.

Affordable Housing

- 6.2.8 The London Plan (2021) requires that large-scale purpose built co-living accommodation provide a contribution toward affordable housing. However, given that the proposed accommodation typology is not required to meet national minimum space standards, any contribution would not be made on-site, instead would be by way of a financial contribution through S.106 obligation. BNP Paribas conducted an initial Financial Viability Assessment (FVA) on the scheme and found the scheme to be unviable. The Council appointed Avison Young (AY) to review this FVA and concluded that the main area of contention between the consultants were the build costs. AY concluded that adopting 30% management costs, £280 psf build costs and 15% profit on cost, generated a small surplus of £160,000. The Applicant subsequently agreed to adopt AY's 30% management fee but maintained their position on build costs at £298 psf.
- 6.2.9 The applicant requested that the late stage review mechanism was removed in lieu of a 'without prejudice' offer. However, this was not been accepted by the LPA and the late stage review mechanism was deemed necessary, particularly as its removal had previously been on the basis that the product had been relatively new and the take-up was uncertain. There are now a number of co-living schemes operating in Harrow and London, therefore the inclusion of a late stage review mechanism poses a lower risk. As such, the £160,000 surplus and late stage review mechanism was agreed by both parties.
- 6.2.10 Based on the above, the proposed development complies with the National Planning Policy Framework (2021), policy SD6 and H16 of The London Plan (2021), policies AAP13 of the Harrow and Wealdstone Area Action Plan (2013), policies CS1 of the Core Strategy (2012) and policy DM1 of the Development Management Policies Local Plan (2013).

6.3 Design, Character and Appearance of the Area

6.3.1 The relevant policies are:

- National Planning Policy Framework (2021)
- The London Plan 2021: D1, D2, D3, D5, D11, HC1
- Harrow Core Strategy 2012: CS1
- Harrow Development Management Policies Local Plan (2013): DM1, DM2, DM7, DM9, DM10, DM22, DM23, DM27, DM42, DM44, and DM45

Relevant Supplementary Documents

- Residential Design Guide (2010)
- The London Plan Housing Supplementary Planning Guidance (2016)
- Code of Practice for Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (2016)
- Roxborough Park and the Grove Conservation Area Appraisal and Management Strategy
- Local Listed Buildings SPD

6.3.2 Lowlands Road is characterised by larger office-typology buildings of four to five storeys to its northern side, with two storey Victorian/Edwardian residential properties to the southern side. Further south of site is Roxborough Park Conservation Area. The proposal will result in a greater massing presence within the street scene and will be taller than Grove House, but of a similar height to No. 67-71, the southern elevation of which abuts the footpath. As such, while there would be impacts to the street scene, these would not be of a significant negative impact to properties to the south or the prevailing character of Lowlands Road.

6.3.3 The site is bound directly to the north by The Heights development, an existing building of five storeys. The current building does not have a strong townscape presence, by virtue of a significant setback from the main building line to accommodate a parking forecourt (17-22m deep). Additionally, the existing The Heights building has an asymmetric frontage, with the western bay set back from the central glazed atrium than the eastern bay. As such, introducing an extension to sit proud of the main elevation and in line with the prevailing building line has a degree of logic. It is noted that Grove House directly adjacent to the proposed development would ensure some visual impact however this is discussed further within the report. Notwithstanding this, it is not considered overall that the proposal would appear at odds with the host property or streetscene.

Site Strategy

6.3.4 Although a comprehensive redevelopment of the site would have been a highly preferable solution to the extension proposed, there are environmental benefits to the retention of a building in apparent good structural condition, principally in providing a development with lower embodied carbon than a demolition and replacement alternative. The replacement of a largely inactive parking forecourt with a shared amenity space, planting and a street elevation featuring habitable room

windows somewhat improves the amount of active frontage to Lowlands Road and would animate this part of the road.

Massing, Scale and Built Form

- 6.3.5 The proposed extension results in an asymmetric street frontage and built form facing Lowlands Road. Features such as roof form and hipped roof elements are continued, which is appropriate and continues a built form language from the existing building. While the existing building features a degree of setback to elements of its street-facing massing, the proposal greatly increases this with a significant south-western extension. Concerns have been raised by the urban design officer that the building would appear poorly resolved and unbalanced when viewed and approached from its street-facing elevation (Lowlands Road). However, CGI images presented demonstrate that the material palette, recessed fifth floor and stepped front and side walls with the retention of a set back from the front boundary would ensure that even when viewed from Lowland's Road the building would appear akin to its surroundings. Further mitigation is presented through the landscape strategy.
- 6.3.6 The Council's Design Officer also notes that the proposed massing, by virtue of its southern elevation alignment with Grove House, does strengthen the building line of Lowlands Road and broadly aligns with that of other buildings on the street's northern side. It is noted that the presence of a five storey building would have some impact to Grove House due to its close proximity to the side boundary. However, there is some visual relief with the minimum separation distance of the service road being just over 6m wide and other walls on this flank being set further away from that side.

Impact to the Conservation Area

- 6.3.7 The application was reviewed by the Council's Conservation Officer. This property is sited in the Roxborough Park and the Grove conservation area and opposite the locally listed numbers 26 to 40 (even). The special character and appearance of this conservation area is outlined by the Roxborough Park and the Grove Conservation Area Appraisal and Management Strategy. This states: 'Roxborough Park and the Grove Conservation Area is an attractive combination of high quality historic architecture and important public green open spaces, including the Grove Open Space and Church Fields, that serve to emphasize its distinction from the surrounding more modern commercial development of Harrow town centre and the other higher density urban sprawl. The area's undulating topography and unusually permeable pedestrian network complement and enhance the area's visual quality, creating attractive views within, into and out of the conservation area'.
- 6.3.8 The Conservation Officer considers the proposal would preserve the setting of the adjacent Roxborough Park and the Grove Conservation Area and the historic locally listed buildings as there is this clear distinction between this side of Lowlands Road and the other. The subject property is situated in the midst of the modern commercial development of the town centre.

Materials & External Appearance

- 6.3.9 The proposed appearance of extension elevations follows a highly similar post-modern design as The Heights appear to match the existing building. This approach, with similar spaced fenestration and window opening sizes to that of the existing is welcomed insofar that it provides continuity and congruity between the proposed extension and the existing building. Although, the urban design officer does note that there is potential for the development to appear as a single development, if material specification and detailing are correctly achieved. This has been demonstrated by the updated Design and Access Statement. A condition to ensure the materials would match that of the existing building is recommended.

Access

- 6.3.10 The proposed development would have a single main entrance into the building from Lowlands Road. It would be identifiable as it includes a canopy and signage which would distinguish the shared living accommodation from the residential which would be accessed by the main central entrance point. Both entrances would be accessed controlled via respective fobs. A designated cycle lane along the service road would be provided to allow for safe access into the basement stores. Cycle stores for the shared living accommodation would be separated from the residential as would the refuse and recycling. This is considered to be an acceptable arrangement.

Landscaping

- 6.3.11 The proposed amenity space to the front elevation would add greenery and activity to an otherwise inactive area of hardscaping. Outdoor seating has been provided for residents and alongside a landscaping strategy. As such, this space appears to sufficiently cater to the number of residents of the development. In line with comments made by the urban design officer defensible space for the ground floor units has resulted in the provision of small garden areas characterised by soft landscaping. The proposed communal roof terrace to fourth floor is welcome and as a result this floor inset, is partially hidden from passers-by at ground level.
- 6.3.12 The Landscape Officer acknowledges that the proposed four seasons landscaping to the front area with multi stemmed evergreen planting, water feature and open sided pavilion with biodiversity roof. Evergreen landscaping and evergreen privacy screening, with private garden space, is proposed for the ground floor units and considers the screening would provide a generous amount of defensible space and the building being well set back from the road would reinforce this sense of localised suburbia. The proposed mature, specimen type planting would provide an instant impact creating a well landscaped garden. Whilst it is noted that the landscape masterplan is well development it would require further development and detail to create a high quality attractive landscape with interesting, useable and intimate spaces including large communal space, separate smaller spaces, focal points, landscape features, footpath networks and seating. The lightwell areas to the rear of the development, adjacent to the railway line are shown as green, implying soft landscape in the basement areas. Details for this area would also be required. A visually attractive outlook and space for the residents in the adjacent rooms would be essential and ongoing and long term management and maintenance, particularly

intensive in the early years to establish the mature planting, would be essential and most important to ensure establishment and the survival of the planted areas.

- 6.3.13 Both the landscape officer and urban design officer welcome the landscape proposals particularly to offset the impact of the additional built form along this road. The soft landscape along the width of the site would help to create a visually attractive soft landscape setting for the existing and new annex building, to comply with Harrow Council's Development Management Policy, DM 22 Trees and Landscaping. Subject to appropriate hard and soft landscaping conditions, including ongoing and long-term management of the spaces it is considered this would be acceptable.

Refuse and Servicing

- 6.3.14 Policy DM45 of the Development Management Policies Local Plan states that 'all proposals will be required to make on-site provision for general waste, the separation of recyclable materials and the collection of organic material for composting'. In terms of character and appearance, this policy requires refuse storage bins to 'be located and screened to avoid nuisance to occupiers and adverse visual impact'.
- 6.3.15 The development would provide for space for 14 x bins within a dedicated internal store accessed by service vehicles via the shared service road off Lowlands Road. This would allow for appropriate servicing distances. This would provide for 6 x 110l, 6 x 1280l and 2 x 240l bins which is considered to be acceptable in terms of provision for 32 shared living units. The site already benefits from servicing of the existing offices and new residential units. There is sufficient space for service vehicles to turn at the bottom of the ramp and exit the site in forward gear. The Council's Waste Officer has stated that the number of bins, siting and waste strategy is acceptable. A condition ensuring that refuse bins are always stored within the internal refuse area is recommended to safeguard the character and appearance as well as the residential amenity of the area.

Secure by design

- 6.3.16 The Designing Out Crime officer has not provided comments on this scheme. However, the operation and management strategy sets out the means of security which would be in place including CCTV surveillance across the entire premises i.e. communal areas and outdoor spaces, fob access and management of shared equipment. The ground floor units are surrounded by defensible space around the buildings to provide security and privacy for these units. Whilst these measures are in place it would be necessary for secure by design officers to review the scheme once built and therefore certification of achievement of Secured by Design accreditation is required by way of pre-occupation condition.
- 6.3.17 It is therefore considered that the proposed development would not result in a detrimental impact to the of the surrounding area, in accordance with the high quality design character and appearance aspirations of the National Planning Policy Framework (2021), policies D1, D2, D3, D8 and HC1 of The London Plan (2021), policy CS1 of the Core Strategy (2012), policies DM1, DM22 and DM23 of the Harrow Development Management Policies Local Plan (2013) and Area

Action Plan (2013) policies AAP1, AAP4, AAP6 and AAP13 the Supplementary Planning Document: Residential Design Guide (2010).

6.4 Residential Amenity

6.4.1 The relevant policies are:

- National Planning Policy Framework (2021);
- The London Plan: D1, D6, D14, H16
- Harrow Core Strategy: CS1
- Harrow Development Management Policies Local Plan (2013): DM1, DM27

Relevant Supplementary Documents:

- Residential Design Guide (SPD);
- The London Plan Housing Supplementary Planning Guidance (2016)

6.4.2 There are no specific adopted space standards for this type of housing product within the adopted development plan. Policy H16 of The London Plan states that the private units within large-scale purpose-built shared living development should provide adequate functional layout.

6.4.3 Each of the proposed co-living units would have on average 18-26sqm of internal space and a minimum floor to ceiling height of 3m. The internal layout has been designed to accommodate private shower rooms, built in wardrobes, window blinds and wifi and TV and cable TV (see image below). Some units also benefit from private amenity space at ground floor.



6.4.4 All units would be single aspect with either a north-westerly or south and south-easterly orientation. The Daylight and Sunlight Report provided in support of the application concludes that the majority of units would achieve good levels of daylight and sunlight which would be in excess of the BRE and British Standard targets. Specifically, all units perform well in terms of daylight as all rooms met the BRE standard for daylight levels. Whilst not all met the recommended sunlight levels, the rooms result in a shortfall are those that have no windows within 90 degrees of due south. Whilst not ideal, there are two alternative communal areas that achieve good

levels of sunlight including the fourth floor terrace and ground floor garden. As the co-living facility encourages communal living, it is considered on balance that there are sufficient mitigating factors within the design to overcome the shortfall of the scheme in this regard. The set in of the fifth floor would allow some light infiltration to the communal stair core through the side facing windows.

6.4.5 In terms of stacking, the arrangement would generally be acceptable. Furthermore, compliance with building regulations would need to be sought. Therefore, the proposed development is acceptable in this regard.

6.4.6 Criteria 6 of the London Plan Policy H16 requires that communal facilities are sufficient to meet the requirements of the intended number of residents and offer a range of internal and external communal amenity spaces and facilities. This ensures that the quality of overall residential amenity is acceptable. A schedule of amenity has been provided as part of the application. Based on this, each occupier would benefit from 8.5 sqm of internal amenity space and 2.6 sqm of external amenity space (excluding the ground floor garden and private terraces at fourth floor) which is welcomed. It is also considered that the appropriately sized rooms (including some with private gardens) and private facilities coupled with the range of amenity spaces available would be acceptable. A breakdown of the proposed internal and external amenity spaces is summarised below:

Internal Amenity	Ground Floor	First Floor	Second Floor	Third Floor	Fourth Floor	Amenity Net. (sqm)
Lounge / Kitchen	42	42	42	42	84	252
Laundry		4	4	4		12
Store		3	3	3		9
Sub-Total	42	49	49	49	84	273
External Amenity						82
TOTAL	42	49	49	49	84	357
Private Amenity	No. units	No. units	No. units	No. units	No. units	
	5	0	0	0	2	

6.4.7 As demonstrated above, the proposed development would provide a range of internal and external communal spaces which have been designed to create a sense of community, lower barriers to social interaction and to facilitate engagement between residents. The amenity spaces are large, high quality which encourage their use and community engagement. The provision is therefore considered to be of an appropriate type, location and amount which would be proportionate to the number of studio units within the building.

6.4.8 The site is located within an urban location amongst a mix of residential and commercial uses. Given the transient nature and number of future occupants of the

development, in order to ensure the safety of existing and future residents of the immediate vicinity Secure By Design accreditation should be attained and as such a condition to this effect has been included.

Response to COVID 19

- 6.4.9 Whilst not a policy requirement, the current planning application has been submitted under the context of a global pandemic whereby the health and safety of future occupiers is paramount. Co-living relies upon social interaction and engagement and whilst this is important for mental well-being this needs to be carefully measured against safety guidelines imposed by National Government. The applicant has submitted a document outlining the response to COVID 19 including measures to consistently ensure the level of hygiene in communal areas, installation of air purifiers with filters in each unit, provision of Personal Protective Equipment to name a few. It is therefore considered that the co-living nature of the development would provide a level of flexibility and adaptability during unprecedented times as in the current climate.
- 6.4.10 In conclusion, the proposed development, subject to the imposition of appropriate conditions would achieve a high-quality internal design quality of the proposed development is of an acceptable standard and will ensure a good standard of living environment for future residents.

Impact to neighbouring occupiers

Daylight & Sunlight Report

- 6.4.11 A daylight, sunlight and overshadowing report was prepared by JAW in support of the current application. The nearest residential properties are those at the existing site. However, as these are sited away from the proposed development by sufficient distances the daylight results do not show any adverse impact to these. Furthermore, the front facing windows of these properties would be angled away from the side facing windows of the proposed development which would safeguard privacy of these occupiers.

Grove House (No. 55 Lowlands Road)

- 6.4.12 The Daylight and Sunlight report shows that windows to the office building would be affected by the site, although it should be noted that the requirement for daylight is less important than that in residential buildings. Further analysis was conducted including reduced daylight criteria, No Sky Line assessments and internal daylight calculations using assumed layouts. Given the large windows on this block and separation distance, it indicates that the office is still likely to receive sufficient amounts of daylight. This combined with the recommended flexibility applied to daylight assessments in London and given that these windows serve offices (which are not typically assessed for daylight) mean that the levels would be acceptable.
- 6.4.13 With regards to privacy, there are windows of single aspect units located on the flank wall of facing Grove House. In order to ensure that the proposal would not prejudice development coming forward on this site, privacy screening has been

proposed, however details of these are not provided and therefore will be secured by way of condition.

67-71 Lowlands Road

- 6.4.14 The proposed development is sited away from this property by approximately 24m and therefore it is not considered that it would cause detrimental harm with regards to loss of daylight, sunlight or outlook on that side. Furthermore, the side facing windows would be sufficiently set away so as not to cause any loss of privacy or experience overlooking.

Properties along Lowlands Road on the opposite side

- 6.4.15 To the south of the application site is two-storey residential along Lowlands Road. Whilst the building line would be sited further forward, the resultant building would maintain a distance of approximately 15m (from the front boundary of 'The Heights' and nearest properties on Lowlands Road (66-70)), with an intervening highway. Although the proposed building is higher and closer than the existing building, it is noted that this relationship is representative of the commercial buildings located directly either side and further west along the road. Given the modest height of the proposed building in an urban setting, it is considered that this relationship is acceptable within an urban environment on the edge of a town centre.

6.5 Traffic, Safety and Parking

- 6.5.1 The relevant policies are:

- The London Plan (2021): T4, T5, T6;
- Harrow Core Strategy (2012): CS1;
- Area Action Plan (2013): AAP1, AAP19, AAP20, AAP21
- Harrow Development Management Polices Local Plan (2013):DM1, DM42, DM44

- 6.5.2 This property is within a PTAL 6B location meaning access to public transport is considered to be excellent. Lowlands Road is part of the Transport for London Strategic Road Network. This proposal follows P/2195/20/PRIOR which was granted in August 2020 comprising development for conversion from office to 125 flats, with parking and cycle storage. This is currently being implemented.

Parking Provision

- 6.5.3 This proposal is proposed to be car free in line with Policy T6 E and Table 10.3 based on it being large scale sui-generis residential use within a PTAL 6 location. In line with Highways comments which stated that the parking standards require disabled parking provision for 3% of the total number of dwellings from the outset and a further 7% identified for future conversion, which would result in 11 spaces (9 for the consented scheme and 2 for the current scheme). Accordingly, the scheme has been amended to provide 5 DDA spaces as per the consented scheme, 3 residential spaces for blue badge holders and 2 for the current scheme, totalling 10, all with active electrical charging points. This is considered to be acceptably overcome concerns raised by the highways officer as it would help to mitigate the

impact of the limited on-street options resulting from significant amount of car free development coming forward in this location which could lead to increased demand for on-street disabled parking provision.

- 6.5.4 A legal obligation restricting the issue of parking permits for the surrounding CPZ is also considered to be required to address the aforementioned issue along with a contribution of £1500 to amend the relevant traffic management order. This is necessary in order to minimise the possibility of overspill parking onto the surrounding roads and also encourage sustainable travel.

Car & Cycle Parking

- 6.5.5 The proposal includes 36 long stay and 2 short stay spaces for the HMO units; and 140 cycle spaces are retained as approved for the flats in the existing building. 6 long stay staff cycle parking spaces are also provided within the residential stores. The proposed levels are acceptable and otherwise in line with London Plan requirements.

Delivery and Servicing

- 6.5.6 Information on delivery and servicing trips was not provided as part of application P/2195/20/PRIOR however, it is expected that the combined proposals would result in a higher rate of trips even if some overlap does occur. The revised site layout also means that car parking and servicing trips now use the same area whereas these appeared to be separate in the previously approved layout; this meant less conflict between users and also provided an alternative area for boarding and alighting and deliveries could be made to the main entrance without drivers stopping on-street. The delivery and servicing report does not address potential conflicts between occupiers and deliveries in particular.
- 6.5.7 It is noted that delivery and servicing vehicles would also be encouraged to take place utilising the space at the bottom of the ramp to reduce the number of vehicles stopping along Lowlands Road and the proposed development would be staffed to receive and coordinate delivery activities. It is therefore considered that a final delivery and servicing plan for the entire development would be required prior to occupation by way of condition because although the measures in the report are noted, as this is a predominantly residential development many of these would not apply. Ideally residents should be advised of requirements in relation to arranging deliveries eg. information that they will need to pass on; there should be appropriate signing on-site to advise drivers of where to go. Whilst the proposal may not result in a severe impact for the Highway network, it may be harmful if deliveries and servicing if these are not properly managed and it has not been demonstrated that conflict between the number of users, deliveries and servicing would safeguard the free flow of the highway network.
- 6.5.8 Subject to conditions requiring the submission of a updated delivery and servicing plan, Parking Design and Management Plan, a detailed Construction Logistics Plan in accordance with Transport for London Guidance and legal obligation to restrict parking permits, it is considered that the proposed development would be acceptable in Highway terms and would accord with policies T5, T6, T6.1 of The

London Plan (2021) and policies DM1 and DM42 of the Harrow Development Management Policies Local Plan (2013).

6.6 Development and Flood Risk

6.6.1 The relevant policies are:

- The London Plan (2019): SI12, SI13
- Harrow Core Strategy (2012): CS1
- Harrow Development Management Policies Local Plan (2013): DM1, DM9, DM10

6.6.2 The rear part of the application site is within surface water flood zone 3a and 3b. The application was accompanied by a Flood Risk Assessment and drainage strategy. The Drainage Officer confirmed that the submitted documents were acceptable subject to conditions relating to foul and surface water disposal and attenuation; permeable paving; green and brown roofs.

6.6.3 Subject to the above, the proposal therefore complies with the National Planning Policy Framework (2021), policies SI12 and SI13 of The Draft London Plan (2019), policy CS1 of the Core Strategy (2012) and policies DM1, DM9 and DM10 of the Harrow Development Management Policies Local Plan (2013).

6.7 Ecology and Biodiversity

6.7.1 The relevant policies are:

- NPPF: Chapter 15
- The London Plan: G6
- Harrow Development Management Local Policies: DM20 and DM21

6.7.2 The London Plan Policy G6 requires “Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.” Policy DM21 of the Harrow Development Management Policies states that proposal should secure the restoration and re-creation of significant components of the natural environment as part of the design and layout of development. Particular attention will be paid to green corridors/chains, gardens (including planting for wildlife; Green Roofs, Green Walls, Landscaping and Habitat Creation.

6.7.3 The site forms part of the heavily urbanised fringe of Harrow town centre, immediately to the south of the rail line. It is more than 300 metres away from the nearest SINC and within part of the significant area of deficiency in access to nature, although the Lowlands Recreation Ground and, beyond it The Grove are lined to the Harrow on the Hill Borough Grade 1 SINC. The site itself does not contain features of high value however it is considered proposals should take account of the breeding bird potential, presence of invasive species and opportunities for enhancement, particularly in relation to enhancing access to nature and supporting nature’s recovery more widely. The Biodiversity Officer notes that in this situation, it will be necessary for the design to:

1. adequately address the London Urban Greening Factor requirements
2. provide proportionate net gain for biodiversity, and
3. incorporate features to enhance access to nature and people's enjoyment of it

6.7.4 A preliminary ecological report was submitted in support of the application which provides an appropriately thorough summary of the range of species, habitats and features supported by or recorded within the site and its surrounding and of the setting for the site. It also identifies mitigation measures in respect of likely impacts and proposes enhancements in relation to these. These include mention of biodiverse green roof provision. However, the biodiversity officer considered that the impact assessment was not sufficient and an uplift in biodiversity gain had not been quantified. Furthermore, urban greening requirements had not been factored.

6.7.5 An updated biodiversity report was submitted. This provides a net biodiversity gain of 0.28 biodiversity units with area-based habitats from pre-development levels. This results in a net increase of 123.3% in ecological value. A total of 10% uplift in biodiversity units would be provided. The biodiversity officer has not provided comments on the updated biodiversity report however it is considered that further details on habitat enhancement and management to ensure the delivery of the biodiversity net gain can be secured by way of condition requiring the submission of an Ecological Management Plan (EMP) and through detailed landscaping plans.

6.7.6 In terms of Urban Greening Factor, which is a measure of the amount of urban greening for developments requires a target of 0.4 for residential development according to the London Plan (2021). The UGF report has provided a number of proposals for landscaping and surface cover which would meet the target of 0.4. This is considered acceptable and these measures will be reviewed as part of the assessment of the EMP.

6.7.7 Subject to the conditions recommended above, it is considered that the proposal development would meet the aspirations of the policies listed under paragraph 6.7.1 above.

6.8 Energy and Sustainability

6.8.1 The relevant policies are:

- London Plan: SI 1, SI 5, SI 12
- Harrow Core Strategy: CS1 T
- Harrow Development Management Local Policies: DM1, DM12 and DM14

6.8.2 In broad terms, under Policy 5.2 of the current London Plan, all development is expected to achieve at least a 35% reduction in carbon emission through on-site measures. Any remaining residential carbon emissions are to be offset by way of monetary contribution to ensure that the residential element of the development is zero carbon.

6.8.3 Policy SI2 of the London Plan requires major developments to be net-zero carbon. Policy E1 of the Core Strategy aims to reduce carbon emissions firstly by requiring all development to reduce demand for energy through design. Secondly by requiring

all developments with a gross floor area greater than 500 sq. metres to connect to an existing decentralised energy network as well as by supporting the incorporation of renewable energy generation within the development proposal. An Energy Strategy has been submitted which follows the 'fabric first' approach through the Be Lean, Be Clean and Be Green energy hierarchy to maximise reduction in energy through passive design measures in the first instance, before seeking opportunities to deliver energy efficiently, and finally maximising the provision of low and zero carbon technologies. The proposal allows for provision of a safeguarding route to connect to any future wider District Heat Network.

- 6.8.4 The applicant has submitted an Energy & Sustainability Statement (Integration, May 2020). On review, the content has been found to generally accord with the requirements of the current and 'Intend to Publish' London Plan in that a minimum 35% carbon reduction is proposed on site (36.2%) with the balance carbon emissions (residential element at 238 tonnes to be offset through monetary contribution (£22,610) to achieve the required zero carbon residential development.
- 6.8.5 The statement identifies that there are no district heat networks capable of serving the site, but the provision of an on-site communal heating network will enable future connection should a district network become available; this is acceptable. Furthermore, a reduction is achieved through solar PV, which is reasonable given constraints with respect to roof space.
- 6.8.6 It is recommended that planning obligations are secured via Section 106 agreement which safeguard a route for future connection to a district heat network; carbon offset contribution (£22,610) prior to commencement of development and a post-construction assessment to determine if the proposed carbon reductions have been achieved and whether an additional offset contribution (residential element) is required to offset any shortfall, calculated at £1,800 per tonne of carbon. In addition, a condition requiring that the development is constructed and operated generally in accordance with the energy strategy submitted with the application has been added.
- 6.8.7 Subject to the above obligation and condition, the proposed development complies with the National Planning Policy Framework (2021), policies SI1 and SI5 of The London Plan (2021), policy CS1 of the Core Strategy (2012), policies DM1, DM12 and DM14 of the Harrow Development Management Policies Local Plan (2013).

6.9 Accessibility

- 6.9.1 The relevant policies are:
- The London Plan (2021): D5
 - Harrow Core Strategy: CS1
 - Harrow Development Management Local Policies: DM1, DM2
- 6.9.2 The proposed scheme would provide 32 co-living units out of which 4 units would be deigned to be wheelchair accessible. These are spread across the development; within the ground, first, second and third floors. This would equate to more than 10% which would accord with the London Plan policy. There would be inclusive levelled access across the site and two disabled parking spaces would be provided for this development.

6.9.3 Officers are satisfied that the proposals meet the development plan objectives in terms of accessibility and inclusive design and would contribute to the creation of a 'lifetime neighbourhood'. On this basis, it is considered that the proposal complies with the high quality design aspirations of the National Planning Policy Framework (2021), policy D5 of The London Plan (2021), policy CS1 of the Core Strategy (2012), policies DM1 and DM2 of the Harrow Development Management Policies Local Plan (2013) and the Supplementary Planning Document: Residential Design Guide (2010).

7.0 CONCLUSION AND REASONS FOR APPROVAL

7.1 The proposed development would deliver additional housing of a satisfactory layout and design to ensure that the future occupiers would benefit from a high standard of living accommodation. The redevelopment of the site would enhance the urban environment in terms of material presence, attractive streetscape, and accessible routes in and out of the site and would make a positive contribution to the local area, in terms of quality and character. The massing and scale proposed would appropriately relate to the wider area and would permit full optimisation of this previously developed land to bring forward much needed housing which would positively add to the Council's housing delivery targets. Accordingly, the development would accord with development plan policies and is recommended for approval.

APPENDIX 1: Conditions and Informatives

Conditions

1. **Full Time**

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

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

2. **Approved Plans:**

Save where varied by other planning conditions comprising this planning permission or unless otherwise agreed in writing by the local planning authority, the development hereby permitted shall be carried out in accordance with the following approved plans:

Plans:

01/01; L(01)010 Rev P01; L(01)011 Rev P01; L(01)002 Rev P01; L(01)003 Rev P01; L(01)004 Rev P01; L(01)005 Rev P01; L(01)006 Rev P01; L(01)007 Rev P01; L(01)008 Rev P01; L(01)09A Rev P01; L(01)09B Rev P01; L(01)09C Rev P01; L(01)011 Rev P01; L(02)010 Rev 4; L(02)011 Rev 4; L(02)012 Rev 4; L(03)013; L(02)014 Rev 4; L(02)015 Rev 4; L(02)016 Rev 4; L(02)200; L(01)201 Rev 01; L(02)202; L(02)203; L(02)600; L(02)601; L(02)602; L(02)603; L(02)640; L(02)641; L(02)642; L(02)620; L(02)621; L(02)622; L(02)623; L(02)624; L(02)625; L(02)626; L(02)627; L(02)628; L(02)629

Documents:

Proposed Schedule of Areas; Design and Access Statement Rev A; Planning Statement (prepared by Dandi); Flood Risk Assessment (prepared by Ambiental); Noise Impact Assessment Report (prepared by KP acoustics, Rev A); Construction Method Statement (prepared by Stace, March 2022); Transport Assessment (dated December 2021); Transport Assessment – traffic safety measures; Transport Travel Plan (prepared by Vectos, December 2021); Waste Management Report; Delivery and Servicing Plan (prepared by Vectors, December 2021); Operation and Management Statement (December 2021); Daylight and Sunlight Assessment Addendum – assessment of impact on neighbouring properties (prepared by JAW, April 2022); Daylight and Sunlight Assessment (prepared by JAW); Energy and Sustainability Statement (prepared by Integration, December 2021); Supplementary Sustainability Report (prepared by Integration, March 2022); Overheating Assessment; Utilities Report; Preliminary Ecological Appraisal (prepared by Greengage); Technical Note - Air Quality (prepared by entran, December 2021); Contamination Report; Contamination Report Environmental Data; Contamination Report Geotechnical data; Contamination Report Appendix; Biodiversity Impact

Assessment (prepared by Greengage, May 2022); Urban Greening Factor, Rev A (prepared by Greengage); Fire Strategy (prepared by BB7); Health Impact Assessment (prepared by Hodkinson, December 2021); Viability Report (prepared by BNP Paribas); CGI – Proposed Front View; CGI – Proposed Street View

3. Construction Logistics Plan

No development shall take place, including any works of demolition, until a Detailed Construction Logistics Plan has been submitted to, and approved in writing by, the local planning authority in accordance with the format and guidance provided by the Transport for London – www.constructionlogistics.org. The Detailed Construction Logistics Plan shall provide for:

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

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

REASON: To minimise the impacts of construction upon the amenities of neighbouring occupiers and to ensure that development does not adversely affect safety on the transport network in accordance with Local Plan Policies DM1 and DM43 and Policy D14 of the London Plan (2021) and to ensure that the transport network impact of demolition and construction work associated with the development is managed in accordance with Policy T7 of the London Plan (2021), this condition is a PRE-COMMENCEMENT condition.

4. Sewage Disposal

The development hereby permitted shall not be commenced until works for the disposal of sewage have been provided on site in accordance with details to be submitted to, and approved in writing by, the local planning authority. The development shall be carried out in accordance with the details as agreed and shall thereafter be retained.

REASON: To ensure that adequate drainage facilities are provided in accordance with Sewers for Adoption. This is a PRE-COMMENCEMENT condition.

5. Surface water disposal

The development of any buildings hereby permitted shall not be commenced until works for the disposal of surface water have been submitted to, and approved in writing by, the local planning authority. The development shall be carried out in accordance with the details as agreed and shall thereafter be retained.

REASON: To ensure that adequate drainage facilities are provided, reduce and mitigate the effects of flood risk following guidance in the National Planning Policy Framework.

6. Surface water attenuation

The development of any buildings hereby permitted shall not be commenced until surface water attenuation and storage works have been submitted to, and approved in writing by, the local planning authority. The development shall be carried out in accordance with the details as agreed and shall thereafter be retained.

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

7. Design and Method Statement

The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground), have been submitted to and approved in writing by the local planning authority which:

1. provide foundation and construction details on substructure including piling details provide details on the use of tall plant
2. accommodate ground movement arising from the construction thereof
3. and mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

REASON: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft

8. Green Roof

Notwithstanding the approved details and prior to the commencement of development, full details of the green/blue roof and details relating to the long term maintenance and management of the on-site drainage shall be submitted to and approved in writing by the Local Planning Authority. Details thereby approved shall be retained thereafter.

REASON: To ensure that the development has adequate drainage facilities, to reduce and mitigate the effects of flood risk and would not impact the character and appearance of the development, in accordance with The National Planning Policy Framework (2018), policy CS1 of The Core Strategy (2012), policy SI13 of the London Plan (2016) and policies DM1 and DM10 of the Harrow Development Management Local Policies Plan (2013).

9. Permeable Paving

Notwithstanding the approved details and prior to the commencement of development, full details of the permeable paving and details relating to the long term maintenance and management of the on-site drainage shall be submitted to and approved in writing by the Local Planning Authority. Details thereby approved shall be retained thereafter.

REASON: To ensure that the development has adequate drainage facilities, to reduce and mitigate the effects of flood risk and would not impact the character and appearance of the development, in accordance with The National Planning Policy Framework (2018), policy CS1 of The Core Strategy (2012), policy SI13 of the London Plan (2016) and policies DM1 and DM10 of the Harrow Development Management Local Policies Plan (2013).

10. Revised Energy Strategy

No development shall take place until a revised energy strategy has first been submitted to the Local Planning Authority in writing to be agreed. The details of the revised energy strategy will include full Part L calculations based on the version of Part L of the Building Regulations that the scheme will be implemented under.

The approved details shall be installed on site before the occupation of the development and shall be maintained thereafter.

REASON: To ensure the delivery of a sustainable development in accordance with the National Planning Policy Framework (2021), policies S2 of The London Plan (2021) and policies DM12, DM13 and DM14 of the Harrow Development Management Policies Local Plan (2013).

11. Site Levels

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

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

12. Materials

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

- a) facing materials for the building, including brickwork bond details;
- b) windows/ doors, including those to all servicing areas and reveals;
- c) balcony screens including balustrade detail, privacy screens and soffits;
- d) boundary treatment including all vehicle and pedestrian/ access gates;
- e) ground surfacing; and
- f) raised planters;
- g) Rainwater disposal systems (including downpipes) and soil stacks; and
- h) details of privacy screens (particularly those facing Grove House

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

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

13. Detailed Ecological Plan

The development hereby approved shall not progress beyond damp proof course level until a detailed Ecological Management Plan has been submitted to, and agreed in writing by the local planning authority. This shall include:

- a) a fully detailed plan, complete with any necessary illustrations, elevations, plans and specifications, for the provision of biodiversity gain within the development, to encompass built structures and soft landscaping elements,

including but not limited to the suggestions within the Ambient Preliminary Ecological Assessment.

- b) Details of all species records (including recorder(s) names, scientific species name, abundance information, date, and full resolution location data etc.) and Phase 1 mapping information collected in support of this application.
- c) Notwithstanding any grant of planning permission, the applicant will ensure the delivery of the measures approved under (a) during the construction phase is in accordance with the agreed time plan this provides.

REASON: For the purposes of proper planning, to provide certainty and to ensure sustainable development in accordance with the requirements of national, regional and local plan policies relating to the protection and enhancement of biodiversity.

14. External Lighting

Notwithstanding the approved details, the development hereby permitted shall not progress beyond damp proof course level, until details of the lighting of all external communal areas and other external areas (including buildings) within the site has been submitted to the Local Planning Authority. This includes all details of the lighting including sourcing/ manufacturer details, location, height type, direction of light sources, specification, elevations, light spillage and lighting levels. The development shall be implemented in accordance with the approved details and shall be retained as such thereafter.

REASON: To ensure that the development incorporates lighting that contributes to Secured by Design principles, achieves a high standard of quality.

15. Hard and Soft Landscaping

Notwithstanding the approved details, the development hereby permitted shall not progress beyond damp proof course level, until details of soft and hard landscaping for the site has been submitted to, and approved in writing by the Local Planning Authority which shall include:

- a) A scheme for detailed hard and soft landscaping of the development, to include details of the planting, hard surfacing materials, raised planters and external seating and so on. Soft landscaping works shall include: planting plans (at a scale not less than 1:100), written specification of planting and cultivation works to be undertaken and schedules of plants, noting species, plant sizes, plant container sizes (all at time of planting) and proposed numbers / densities and an implementation programme. Planting which may provide benefits in terms of improving air quality are encouraged. The hard-surfacing details shall include samples to show the texture and colour of the materials to be used and information about their sourcing/manufacturer. The hard and soft landscaping details shall demonstrate how they would contribute to privacy between the communal garden/open space areas and the adjacent co-living units;

- b) Green roofs, hard and soft landscape details and planting plans, the roof area with PV panels to be incorporated into the green roof areas where feasible, including written specification of the planting and the biodiverse roof details, planting plans, and associated features (e.g. invertebrate shelters), details of the proposed irrigation or any watering system to be installed for regular watering in dry / drought conditions for the landscaped areas maintenance and proposed ongoing plant replacement, for any plant failures, during the lifetime of the built development;
- c) Full scale metric cross sections and elevations for all communal open amenity spaces (at a scale of not less than 1:100) including the proposed details for level changes; and
- d) Details of all furniture, boundary treatment, specification for the proposed supports and fixings for plants, landscape structures and any pergolas and climbing plant frames, including proposed material and source / manufacturer, irrigation for planting and detailed drawings of such; for all communal areas, raised beds and bespoke furniture.
- e) Details of all boundary treatments within and around the site

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

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

16. Landscape Management Plan

Notwithstanding the approved details, the development hereby permitted shall not progress beyond damp proof course level, until a Landscape Management Plan and Landscape Maintenance Plan for the site as well as for the ongoing management, monitoring and reporting of onsite biodiversity features, including details of how this will be funded in perpetuity have been submitted to and approved in writing by the Local Planning Authority to ensure the future success of the development, which shall include long term design objectives, management responsibilities and maintenance schedules, including the lower ground level hard and soft landscape, outdoor terraces, green roofs and any biodiverse roofs and landscape structures for plant growth and a programme of maintenance including a calendar of routine physical tasks for all landscape areas / plant replacement for the life time of the development for landscape structures. The Landscape Maintenance Plan shall cover a 5 year period for the whole of the proposed development to ensure the future success of the development including all the hard and soft landscape.

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

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

17. Fire Strategy

Notwithstanding the submitted Fire Statement, the development hereby approved shall not progress beyond damp proof course, until a Fire Safety Strategy produced by a third party suitably qualified assessor shall be submitted to and approved in writing by the Local Planning Authority, this statement shall include details of how the development will function in terms of the following:

- A) identify suitably positioned unobstructed outside space: a) for fire appliances to
- B) be positioned on appropriate for use as an evacuation assembly point is designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm
- C) systems and passive and active fire safety measures is constructed in an
- D) appropriate way to minimise the risk of fire spread
- E) provide suitable and convenient means of escape, and associated evacuation strategy for all building users, including the provision of fire evacuation lifts;
- F) provide suitable and convenient means of escape, and associated evacuation strategy for all building users, including the provision of fire evacuation lifts;
- G) develop a robust management strategy for evacuation which is to be periodically updated and published (details of how often this management strategy is to be reviewed and published to be included), and which all building users can have confidence in
- H) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

The development shall be operated in accordance with the approved details in perpetuity.

REASON: To ensure that the fire safety of the proposed building is managed in a satisfactory manner and that the development contributes to fire safety in line with Policy D12.B of the London Plan (2021). To ensure appropriate fire safety measures are approved before development commences on site.

18. Access Strategy

The development hereby approved shall not progress beyond damp proof course level until an inclusive access strategy for the site has been submitted to, and agreed in writing by, the Local Planning Authority. The strategy shall:

- a) demonstrate inclusive access within the proposed development including all communal areas;

- b) detail the arrangements for disabled residents' access to the disabled parking spaces and the access, and use of, waste and recycling facilities within the development.

The development shall be carried out in accordance with the approved details prior to the first occupation of the site and shall be retained as such thereafter.

REASON: To ensure that the development contributes to the achievement of a lifetime neighbourhood.

19. Communal Aerials

Prior to the first occupation of the residential units hereby permitted, details of a strategy for the provision of communal facilities for television reception (eg. aerials, dishes and other such equipment) shall be submitted to and approved in writing by the local planning authority. Such details shall include the specific size and location of all equipment. The approved details shall be implemented prior to the first occupation of the residential units and shall be retained thereafter. No other television reception equipment shall be installed on the building without the prior written approval of the Local Planning Authority.

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

20. Secure By Design

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

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

21. Car Park, Design and Management Plan

Prior to occupation, a Car Parking Design and Management Plan shall be submitted to, and agreed in writing by, the Local Planning Authority. The plan shall set out the following:

- a. Details of spaces that are to be 'active' electric vehicle charging point spaces and are to be 'passive' electric vehicle charging point spaces. The plan should outline the provision of one active Electric Vehicle Charging Point for at least 20% of spaces from the outset with the remaining 80% passive.
- b. Mechanism for increasing the number of spaces that have an 'active' electric vehicle charging point if monitoring demonstrates additional demand.

- c. Details of the allocation and management of the disabled car parking spaces including how an additional seven percent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient.
- d. Details of monitoring, management and enforcement procedures for parking within the site.
- e. Details of future provision of disabled person's parking spaces should demand increase.

REASON: To ensure that the car parking is managed in a satisfactory manner and that the development contributes to more sustainable travel in accordance with Local Plan DM42 and Policy T6 and Policy T6.5 of the London Plan (2021)..

22. Cycle Parking

The residential units hereby permitted shall not be occupied until details for secured, sheltered and accessible storage for the provision of cycle spaces have been submitted and approved in writing by the local planning authority. Such cycle storage should be designed in accordance with the requirements of the London Cycle Design Standards. The development shall be completed in accordance with the approved details prior to the occupation of the residential units, and shall thereafter be retained.

REASON: To ensure that cycle storage is available for use by the occupants of the site.

23. Delivery and Service Plan

The residential premises hereby approved shall not be first occupied until a Delivery and Servicing Plan has first been submitted to the Local Planning Authority in writing to be agreed. The delivery and service plan shall be carried out in accordance with the approved details for the lifetime of the development.

REASON: To ensure that the transport network impact of deliveries associated with the development is managed in accordance with Policy 7 of the London Plan (2021) and Policy DM 44 of the Harrow Development Management Policies Local Plan (2013).

24. Refuse Stores

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

REASON: To safeguard the appearance and character of the surrounding area, in accordance with policy 7.4.B of The London Plan (2016) and ensure a high standard of residential quality.

25. Permitted Development Restrictions – Communications

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

REASON: To ensure that the architectural integrity of the building is not compromised.

26. Noise and Vibration

The noise and vibration mitigation measures shall be carried out in accordance with the Noise Impact Assessment hereby approved and shall be retained in that form thereafter.

REASON: In order to safeguard the amenities of neighbouring residents and future occupiers.

27. Landscape Implementation

All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the building(s), or the completion of the development, whichever is the sooner. Any existing or new trees or shrubs which, within a period of 5 years from the completion of the development, die, are removed, or become seriously damaged or diseased, shall be replaced in the next planting season, with others of a similar size and species, unless the Local Planning Authority agrees any variation in writing.

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

28. Amplification of sound

No music or any other amplified sound caused as a result of this permission shall be audible at the boundary of any residential premises from any of the external terraces above ground floor level, either attached to, or in the vicinity of, the premises to which this permission refers.

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

Informatives

1. The following policies are relevant to this decision:

National Planning Policy Framework (2021)

The London Plan (2021):

D1, D2, D3, D4, D5, D6, D7, D8, D9, D11, D12, D13, H1, H2, H5, H8, H12, H16, HC1, G5, G6, G7, SI1, SI2, SI3, SI5, SI8, SI13, T2, T3, T4, T5, T6, SD6, SD7

Harrow Core Strategy (2012):

CS1

Harrow and Wealdstone Area Action Plan (2013)

AAP1, AAP4, AAP5, AAP6, AAP8, AAP13, AAP19

Harrow Development Management Policies Local Plan (2013):

DM1, DM2, DM9, DM10, DM12, DM13, DM14, DM15, DM20, DM21, DM22, DM23, DM27, DM42, DM43, DM44, DM45, DM50

Supplementary Planning Documents:

Supplementary Planning Document: Residential Design Guide (2010)

Supplementary Planning Document: Planning Obligations and Affordable Housing (2013)

Technical Housing Standard (2015)

Code of Practice for Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (2008).

Mayors Housing Supplementary Planning Guidance (2016)

2. Grant without Pre-application

Statement under Article 35(2) of The Town and Country Planning (Development Management Procedures) (England) Order 2015

This decision has been taken in accordance with paragraphs 39-42 of The National Planning Policy Framework. Harrow Council has a pre-application advice service and actively encourages applicants to use this service. Please note this for future reference prior to submitting any future planning applications.

3. Considerate Contractor Code of Practice

The applicant's attention is drawn to the requirements in the Considerate Contractor Code of Practice. In the interests of minimising any adverse effects arising from building operations, the limitations on hours of working are as follows:

0800-1800 hours Monday - Friday (not including Bank Holidays)

0800-1300 hours Saturday

4. Party Wall Act

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

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

3. excavating near a neighbouring building, and that work falls within the scope of the Act.

Procedures under this Act are quite separate from the need for planning permission or building regulations approval.

"The Party Wall etc. Act 1996: explanatory booklet" is available free of charge from: Communities and Local Government Publications, PO Box 236, Wetherby, LS23 7NB

Please quote Product code: 02 BR 00862 when ordering.

Also available for download from the Portal website:

<https://www.gov.uk/party-wall-etc-act-1996-guidance>

5. Compliance with planning conditions

IMPORTANT: Compliance With Planning Conditions Requiring Submission and Approval of Details Before Development Commences

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

6. Mayoral CIL Payment

Please be advised that approval of this application (either by Harrow Council, or subsequently by the Planning Inspectorate if allowed on appeal following a refusal by Harrow Council) will attract a Community Infrastructure Levy (CIL) liability, which is payable upon the commencement of development. This charge is levied under s.206 of the Planning Act 2008 Harrow Council, as CIL collecting authority, has responsibility for the collection of the Mayoral CIL The Provisional Mayoral CIL liability for the application, based on the Mayoral CIL levy rate for Harrow of £60/sqm is £188,820.

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

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

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

https://ecab.planningportal.co.uk/uploads/1app/forms/form_1_assumption_of_liability.pdf https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf

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

https://ecab.planningportal.co.uk/uploads/1app/forms/form_6_commencement_notice.pdf. The above forms should be emailed to HarrowCIL@Harrow.gov.uk

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

7. Liability for damage to highway

The applicant is advised to ensure that the highway is not interfered with or obstructed at any time during the execution of any works on land adjacent to a highway. The applicant is liable for any damage caused to any footway, footpath, grass verge, vehicle crossing, carriageway or highway asset. Please report any damage to nrswa@harrow.gov.uk or telephone 020 8424 1884 where assistance with the repair of the damage is available, at the applicants expense. Failure to report any damage could result in a charge being levied against the property.

8. Street Numbering

Harrow Council is responsible for the naming and numbering of new or existing streets and buildings within the borough boundaries. The council carries out these functions under the London Government Act 1963 and the London Building Acts (Amendment) Act 1939.

All new developments, sub division of existing properties or changes to street names or numbers will require an application for official Street Naming and Numbering (SNN). If you do not have your development officially named/numbered, then it will not be officially registered and new owners etc. will have difficulty registering with utility companies etc.

You can apply for SNN by contacting technicalservices@harrow.gov.uk or on the following link.

http://www.harrow.gov.uk/info/100011/transport_and_streets/1579/street_naming_and_numbering

9. Sustainable Drainage Systems

The applicant is advised that surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SUDS). SUDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible.

SUDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SUDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity.

Where the intention is to use soak ways they should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365.

Support for the SUDS approach to managing surface water run-off is set out in the National Planning Policy Framework (NPPF) and its accompanying technical guidance, as well as the London Plan. Specifically, the NPPF (2012) gives priority to the use of sustainable drainage systems in the management of residual flood risk and the technical guidance confirms that the use of such systems is a policy aim in all flood zones. Policy 5.13 of the London Plan (2016) requires development to utilise sustainable drainage systems unless there are practical reasons for not doing so. Sustainable drainage systems cover the whole range of sustainable approaches to surface drainage management. They are designed to control surface water run-off close to where it falls and mimic natural drainage as closely as possible.

Therefore, almost any development should be able to include a sustainable drainage scheme based on these principles.

The applicant can contact Harrow Drainage Section for further information.

10. Design out crime

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

11. Network Management

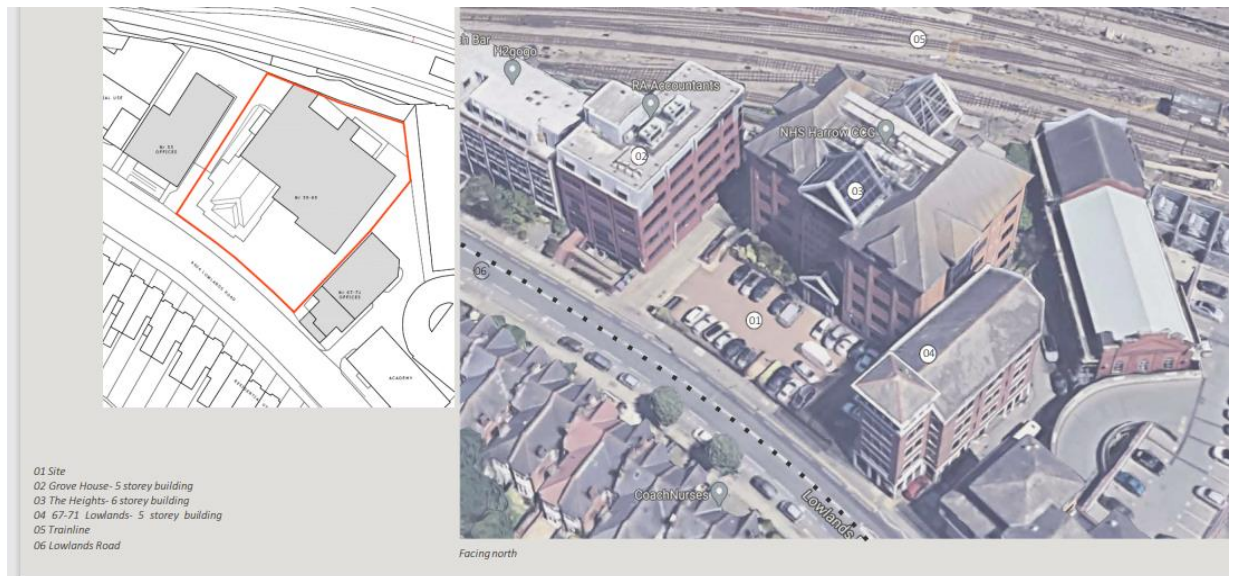
The developer is urged to make early contact with Network Management in order to agree any temporary traffic management measures required; these should then be included in the detailed CLP for submission.

12. The applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; drainage; excavation; and construction methods

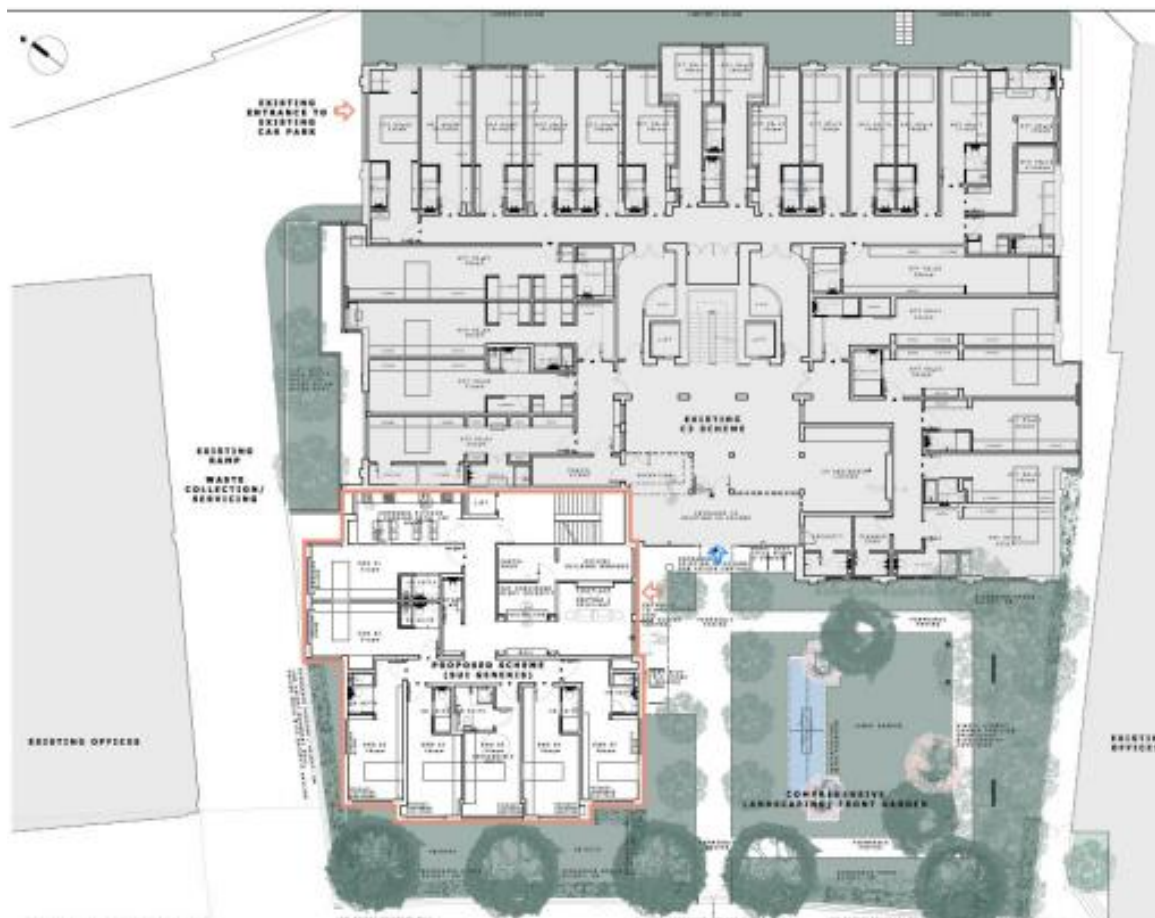
Checked

Interim Head of Development Management	06/07/2022
Corporate Director	07/07/2022

APPENDIX 2: SITE PLAN



Existing Site Plan (above) & Proposed Site Plan (below)



APPENDIX 3: SITE PHOTOS

View of main principle elevation



View of service access and car parking access for Grove House (left) and The Heights (right)



Front car parking for The Heights



View from car park towards two storey houses on Lowlands Road



View from car park towards Grove House



APPENDIX 4: PLANS & ELEVATIONS

Proposed Front Elevation



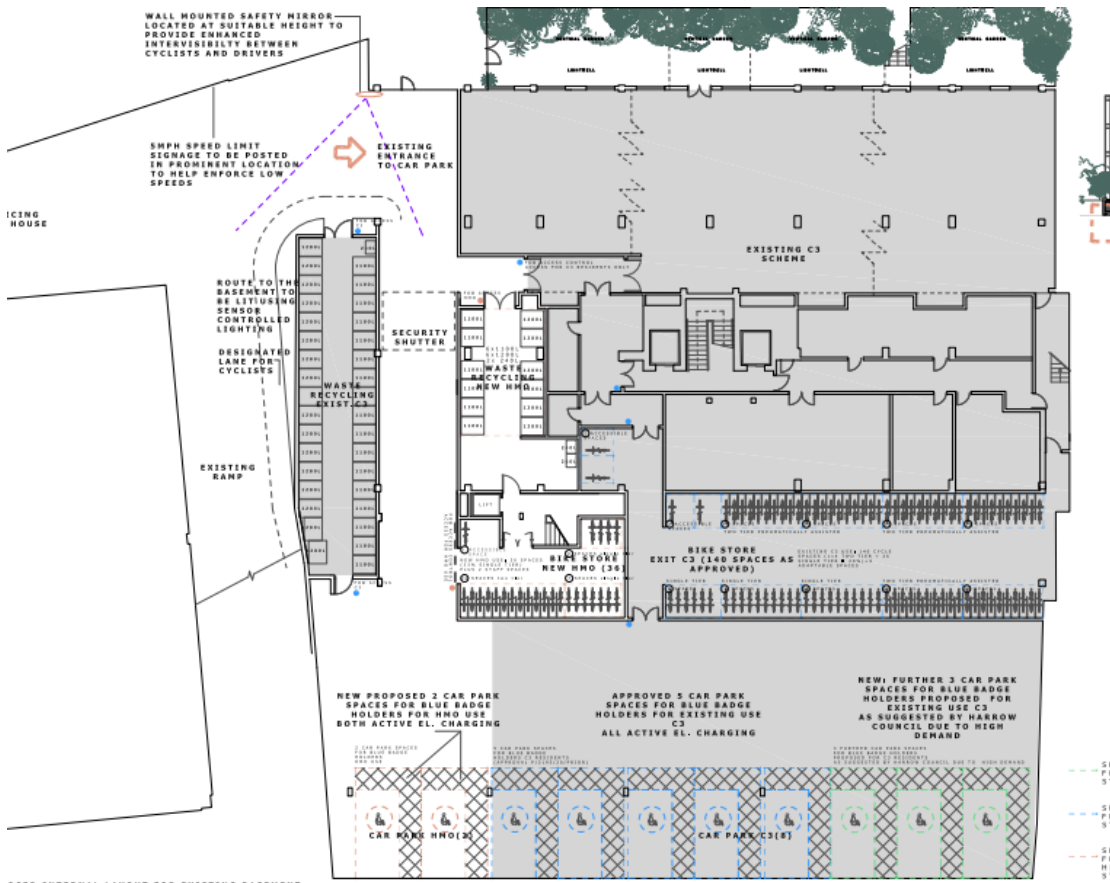
Proposed Rear Elevation



Proposed North West side elevation facing Grove House (privacy screens on windows)

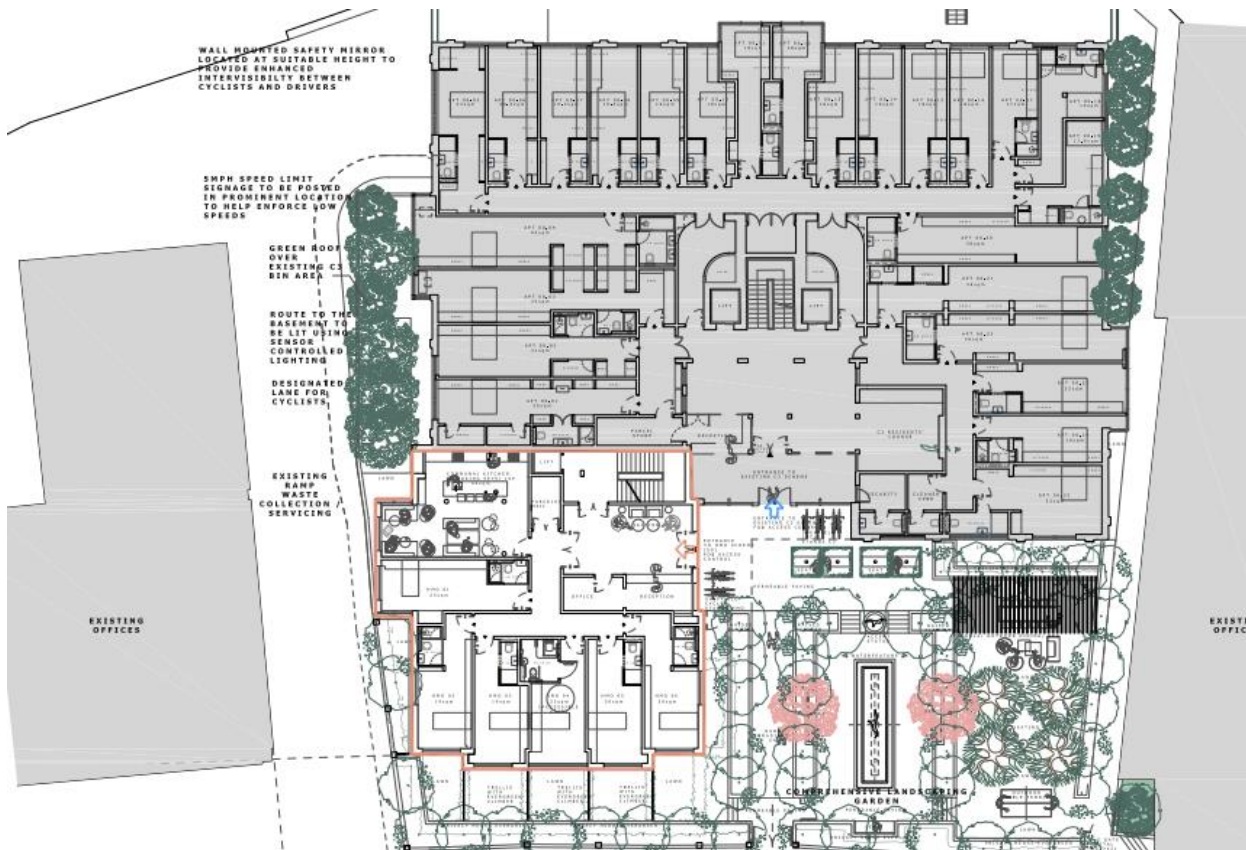


Proposed south east side facing 71 Lowlands Road

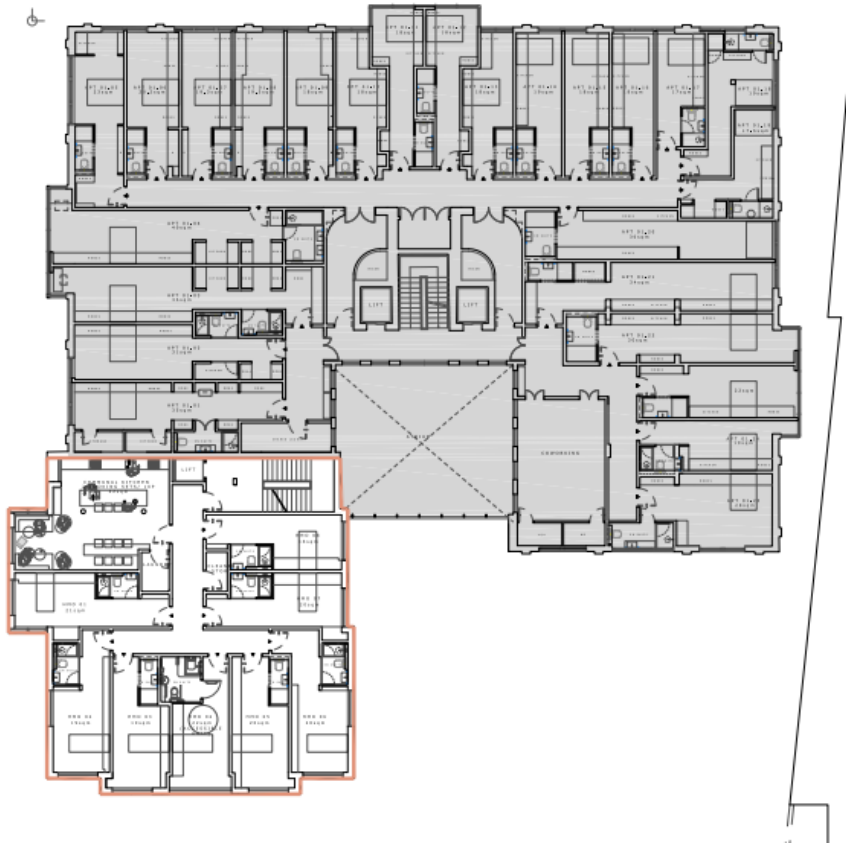


Proposed Basement

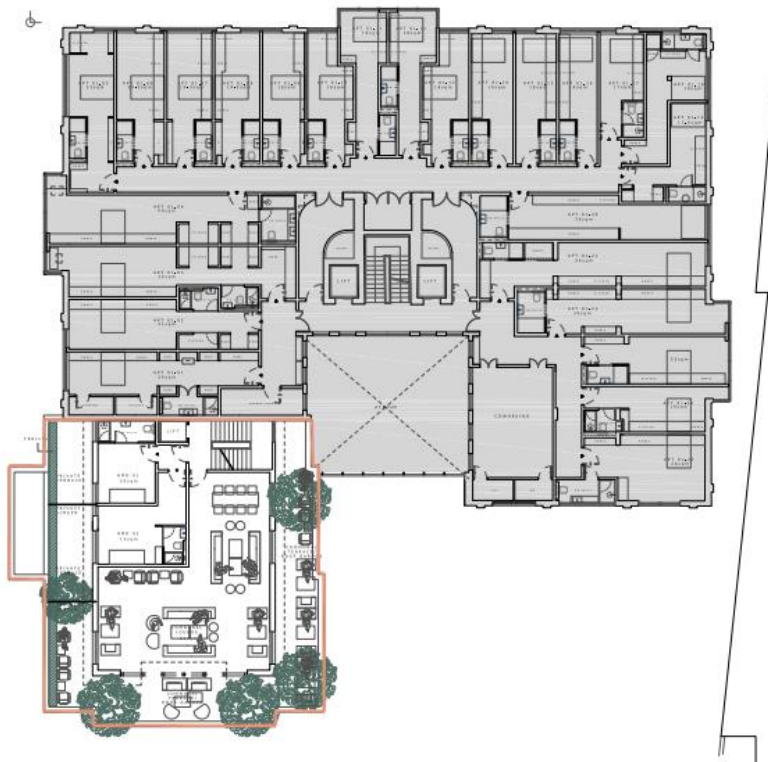
Proposed Ground Floor Plan (Above)



Proposed First and Second Floors



Proposed Third Floor (above) and Proposed Fourth Floor (Below)



3D Visualisations



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