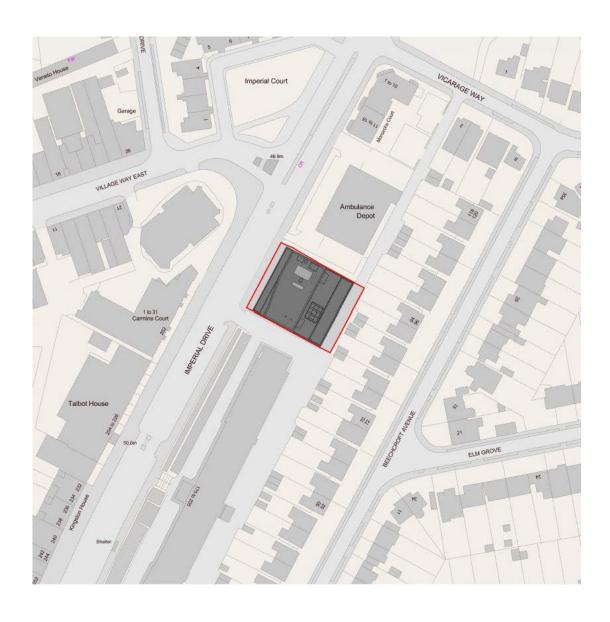


187 Imperial Drive, North Harrow, Harrow HA2 7JP

P/0186/23

Location Plan



LONDON BOROUGH OF HARROW

PLANNING COMMITTEE

19th July 2023

APPLICATION NUMBER: P/0186/23 **VALID DATE:** 22/02/2023

LOCATION: REGENT COLLEGE, 167 IMPERIAL DRIVE, NORTH

HARROW

WARD: NORTH HARROW

POSTCODE: HA2 7JP

APPLICANT: REGENT GROUP LIMITED

AGENT: NEXUS PLANNING CASE OFFICER: MONGEZI NDELA

EXPIRY DATE: 21/04/2023 EXTENDED TO 29/09/2023

PROPOSAL

Redevelopment to provide five storey building with basement level comprising of higher education facilities (use class f1(a)) and 5 x self-contained flats to fourth floor (2 x 2 bed and 3 x 1 bed); landscaping

RECOMMENDATION

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 Chief Planning Officer in consultation with the Director of Legal and Governance Services for the completion of a legal agreement and other enabling legislation and issue of the planning permission, subject to any comments and objections that are received as a result of the site notice/advertisements which expires on 4th August 2023 being addressed to the satisfaction of the Chief Planning Officer and subject to minor amendments, insertion to or deletion of the conditions (set out in Appendix 1 of this report) or the legal agreement. The Legal Agreement Heads of Terms would cover the following matters:
 - a. Harrow Employment and Training Initiatives: financial contribution towards local training and employment initiatives prior to commencement - £25,000
 - b. Carbon offsetting contribution £20,339
 - c. Parking Permit Restrictions The development to be "resident permit restricted" in accordance with section 16 of the GLC (Gen Powers) Act 1974 and the developer to ensure that 1) all marketing/advertising material makes reference to this fact and 2) all agreements contain a covenant to the effect that future occupiers and tenants (other than those

who are registered disabled) will not be entitled to apply for residents parking permit or a visitor permit. A contribution in accordance with the adopted fees and charges of £1,500 is required to amend the Traffic Management Order

- d. Legal Fees: Payment of Harrow Council's reasonable costs in the preparation of the legal agreement.
- e. Legal Agreement Monitoring fee of £500

RECOMMENDATION B

That if the Legal Agreement is not completed by 29th September 2023, or as such extended period as may be agreed by the Chief Planning Officer, then it is recommended to delegate the decision to REFUSE planning permission to the Interim Chief Planning Officer on the grounds that:

The proposed development, in the absence of a Legal Agreement to provide appropriate improvements, benefits and monitoring that directly relate to the development, would fail to adequately mitigate the impact of the development on the wider area and provide for necessary social, environmental and physical infrastructural improvements arising directly from the development, contrary to the National Planning Policy Framework (2021), policies D7, H5, G6, E10, SI2, SI3, and DF1 of The London Plan (2021), policy CS1 of the Core Strategy (2012), policies DM1, DM13, DM20, DM21, DM24, and DM50 of the Harrow Development Management Polices Local Plan and the Supplementary Planning Document: Planning Obligations & Affordable Housing (2013).

REASON FOR THE RECOMMENDATIONS

The proposal would contribute towards housing stock within the Borough and the principle of redeveloping the site in order to provide new residential accommodation is considered acceptable.

The proposed development would appropriately relate to the site, local context, massing and architectural appearance and would bring forward a mixed-use development of a satisfactory layout and design to ensure that the future users of the site would benefit from a high-quality educational establishment and that future residential occupiers would benefit from an acceptable standard of living accommodation.

Furthermore, it is considered that the proposal would not have an unduly harmful impact on the character of the surrounding area, or the residential amenities of the neighbouring or future occupiers and the design is considered to be sympathetic to the character of the local area. Accordingly, weighing up the development plan policies and proposals along with other material considerations including comments received in response to notification and consultation as set out below, Officers consider and conclude that, subject to planning conditions, the proposed development is acceptable and worthy of support. In accordance with the National Planning Policy Framework, including its presumption in favour of sustainable development, and subject to conditions, Officers recommend that the application is approved.

INFORMATION

This application is reported to Planning Committee as it would provide in excess of 3 new residential units and include non-residential floorspace greater than 400m2. 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: E13 Minor Dwellings

Council Interest: N/A

Net additional Floorspace: 3,040.96sqm (residential 429.21sqm)

GLA Community Infrastructure Levy £25,752.60

(CIL) Contribution (provisional):

Local CIL requirement: £47,213.10

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 Polices 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 <u>SITE DESCRIPTION</u>

- 1.2 The site comprises a rectangular-shaped parcel of brownfield land, located immediately to the south of the junction of Village Way East and Imperial Drive in Rayners Lane.
- 1.3 The site is currently in use as a higher education college, and comprises of a three-storey college building, including ground level parking.
- 1.4 The site measures approximately 0.12 hectares and is largely free of significant trees and vegetation.
- 1.5 The site is located within the boundary of Rayner's Park District Centre but is located beyond the Primary and Secondary Shopping Frontages.
- 1.6 The site currently has a single vehicular access point from Imperial Drive and egress via the lane to the rear. The main pedestrian access is from Imperial Drive.
- 1.7 The site is bound to the north by a Pinner Ambulance Station, and to the east, by the rear of residential properties facing Beechcroft Avenue. To the south of the site is Broad House, a former office building which has since been converted to flats. To the west of the site are a mix of commercial and residential use within Rayners Lane District Centre. The site is also within the setting of the former Rayners Lane Public House, a Grade II Listed Building.
- 1.8 The site is located within the Rayner's Lane District Centre, which provides a diverse mix of retail and service uses. The site is located approximately 200m from Rayner's Park Underground Station.
- 1.9 The site has a Public Transport Accessibility Level (PTAL) of 4 however is immediately adjacent to an area with a PTAL of 5.

2.0 PROPOSAL

- 2.1 The application proposes to redevelop the site to provide a new five-storey mixed use building fronting Imperial Drive.
- 2.2 The building is proposed to primarily retain its educational use, providing routes to higher education, with an element of residential above. The first four storeys are proposed to be retained within the education use whilst a fifth floor is proposed to be residential. It is estimated that up to 420 students and 30 staff on-site on a typical day, which is an increase of 45 students and 10 staff compared to current usage.
- 2.3 The proposals extend to five floors with the ground and first floors covering the full width and length of the site. The second and third floor are then set back from the front elevation by approximately 3m and set back from the rear by approximately 5.8m, whilst the fourth floor is set back further from the rear elevation by

- approximately 7.8m. Two terraces are provided to the rear of the first floor whilst an additional rear terrace is provided at second floor level.
- 2.4 A total of five flats are proposed comprising of 2 x 2b4p flats and 3 x 1b2p flats. Access would be via the ground floor side entrance. The proposed building would have a flat roof.
- 2.5 A new scheme of hard and soft landscaping is proposed throughout the site, including additional planting at the various roof and terrace levels. As well as an area of green roof with photovoltaic panels at the roof level.
- 2.6 Vehicular access is situated to the rear of the building where four parking spaces are provided including two disabled spaces.
- 2.7 The proposals include 42 bicycle parking spaces for short stay parking to the front of the site. A further 18 cycle long stay parking spaces for staff and students are provide within the building at the ground floor level. 10 Cycle parking spaces associated with the residential component are provided at the ground floor level
- 2.8 The waste storage would be provided to the rear of the building at ground floor.

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 & date of decision	
P/898/04/CFU	Change of use: class b1 to d1(offices to education) on ground first and second floors	Grant - 24/05/2004	
P/153/06/DFU	3.55M high chain-link fence to rear and side boundary	Grant - 9/03/2006	
P/5432/17	Display of six non-illuminated fascia boards on railings	Refuse - 27/06/2018	

4.0 Consultation/Advertisement

- 4.1 Application advertised as Affecting the setting of a Listed Building and Conservation Area on 11th July 2023 and Site Notice erected on 30th June 2023.
- 4.2 A total of 106 consultation letters were sent to neighbouring properties regarding this application and a site notice was erected on 27th February 2023.

4.3 Three objections were received.

 I am writing to object to the proposed application, as prior to the current owners (Regent College) taking possession of the property, there was originally consultation regarding the same and it was agreed that they would take ownership as it was to be used for educational purposes. Officer Response:

This is not a material planning consideration

This will not only block out light / obstruct part of the view for residents
of Imperial Court but will also cause extra congestion and parking
problems for the whole area.

Officer Response

Please refer to sections 6.4 and 6.5 of this report

 Traffic is horrendous at peak times from North Harrow to Alexandra Avenue

Officer Response

The residential component on this site is relatively small in comparison to the enhanced educational establishment that would be created. Furthermore, the proposal only includes four new parking spaces which is considered negligeable on the existing capacity on site.

 There are already many flats within the vicinity Officer Response:
 This is not a material planning consideration

There are lots of unofficial HMOs.

Officer Response:

A condition will be attached to ensure that the flats are not converted to HMO's

 Regent College has various educational site which presumably mean they will apply for similar planning permissions elsewhere.

Officer Response: This is not a material planning consideration

This 5 story will effect our privacy.
 Officer Response

Please refer to section 6.4 of this report

Traffic is worst affecting more pollution and parking issues.
 Officer Response

Please refer to section 6.5 of this report

4.4 A summary of the consultation responses received along with the Officer comments are set out in the table below: -

Consultee and Summary of Comments

Transport for London

Healthy Streets and ATZ:

- All developments should deliver against the Mayor's Healthy Streets approach, in line with Policy T2. An Active Travel Zone (ATZ) assessment was provided to support this application. The ATZ assessment has been conducted along 4 key routes.
- The ATZ highlighted and concluded that there are no significant areas where improvements are required. The London Borough of Harrow as the highway authority is best placed to assess this conclusion. In line with London Plan policy T2, TfL will support Harrow should they request a contribution/works in kind to deliver improvements which will benefit future staff, students, and visitors of the site, support the 10 Healthy Street indicators, and will further encourage active travel.

Cycle Parking:

The current level of cycle parking proposed is below the requirements of the London Plan, see paragraph 5.20 of the Transport Assessment. London Plan Policy T5 requires a minimum of 29 long stay cycle parking spaces, and 60 short stay cycle parking spaces for the education element of the scheme, and a further 9 long stay cycle parking spaces and 2 short stay cycle parking spaces for the residential element of the scheme. The applicant has proposed the following levels of cycle parking, 21 Sheffield stands providing 42 short stay cycle parking spaces, and an internal 18 spaces for long stay cycle parking for the education element, and 10 cycle parking spaces in an internal store for the residential scheme. TfL requests that the minimum level of cycle parking standards in the London Plan are achieved at this site, in addition TfL highlight that 20% of the residential cycle parking should be provided as Sheffield Stands to ensure accessibility for all, and additional 5% of spaces are able to accommodate large cycles.

Car Parking:

The proposal includes 2 standard parking bays for the residential element of the scheme and 2 disabled parking bays for the education element of the scheme. Policy T6 of the London Plan states that 'Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport' and that 'All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces'. The proposed level of car parking is in line with London Plan Policy T6.

However, TfL request that at least 20% of the parking has active charging facilities and the remaining spaces have passive provision to ensure compliance with London Plan Policy T6.

A condition securing the blue badge parking spaces and EVPC should be secured.

Deliveries and Servicing Plan:

Delivery and Servicing (DSP) has not been submitted to support this application. Further information should be provided regarding the deliveries and servicing strategy. The DSP should be agreed with the local authority due to the road (Imperial Drive) being a borough highway. DSP subsequently submitted.

Construction:

An outline Construction Logistics Plan (CLP) has been provided to assess/mitigate impacts from the proposed development. TfL requests a full CLP is secured via condition in accordance with London Plan and TfL guidance.

Thames Water

Waste Comments

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation.

Surface Water Drainage

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.

Building Regulations

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team

LBH Design Officer

Massing

- The key concern with the proposed massing is the appropriateness of massing to the rear of site, the rear elevation and its location and proximity to neighbouring dwellings.
- While it is the case that the proposed rear elevation technically aligns
 with the rear elevation of the existing Regent College building, the
 existing building features a much smaller area of ground and first floor
 massing and rear elevation, with c. 12m wide elevation, as opposed to
 the proposed 26m wide ground and first floor elevation.

Revised Massing Option 1

- Pull first floor rear elevation away from rear boundary to increase separation distance between proposed building and Broad House properties.
- It could be preferable to bring this in-line with second and third floor rear elevation.
- Broad House, to the south of the site is a five-storey development on Imperial Drive with a separation distance between its rear elevation and the rear elevation of dwellings to Beechcroft Avenue of circa 30 metres. Increasing separation distance of the proposed ground and first floor rear elevation (currently 22m) to match this distance and align with the rear elevation of Broad House would be highly desirable and significantly reduce overbearing impacts.
- Ground and first floor internal layouts would be required to be reconfigured to accommodate this reduction in floor area but would be achievable.

LBH Secure By Design Officer

I would expect the educational facility to follow the most up to date Secured By Design advice, to achieve a Secured By Design accreditation for the College part of this build.

The 5 flats will have to follow the most up to date advice Secured By Design advice for residential builds, and achieve a Gold or Silver Secured By Design accreditation for the residential part of the build.

With the basic design, there is no reason why a Secured By Design accreditation could not be achieved, however there are a few minor changes, and aspects which do need more explanation.

- The perimeter security,
- Refuge strategy
- Postal strategy,
- Cycle storage for the students and staff.

All of which need further explanation, at the earliest stage to prevent unnecessary costs to the developer.

If planning permission is granted I would strongly advise TWO separate, Secured By Design accreditation planning conditions are attached to the planning conditions, and I would advise the developers to contact myself or another design out crime officer at the earliest opportunity.

LBH Highways

No objections subject to conditions

LBH Drainage

No objections subject to informatives

LBH Waste Management Policy Officer

No objections

Landscape Officer

No objections subject to conditions

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 The Government has issued the National Planning Policy Framework [NPPF 2021] sets out the Government's planning policies for England and how these should be applied, and is a material consideration in the determination of this application.
- In this instance, the Development Plan comprises The London Plan 2021 [LP] and the Local Development Framework [LDF]. The LDF comprises The Harrow Core Strategy 2012 [CS],, the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan [SALP] 2013 and Harrow Local Area Map 2013 [LAP].
- A full list of all the policies used in the consideration of this application is provided as Informative 1.

6.0 ASSESSMENT

- 6.1 The main issues are:
 - Principle of the Development
 - Design, Character and Appearance of the Area
 - Residential Amenity
 - Traffic and Parking

- Waste and Servicing
- Flood Risk and Drainage
- Biodiversity
- Fire Safety

6.2 Principle of Development

- 6.2.1 The relevant policies are:
 - National Planning Policy Framework (2021)
 - The London Plan (2021): S1, S3, H1, H2
 - Harrow Core Strategy 2012: CS1.Z
 - Harrow Development Management Polices Local Plan (2013): DM24, DM46
- 6.2.2 Policy S1 C of the London Plan notes that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.
- 6.2.3 Policy S3 of the London Plan relates to 'Education and childcare facilities'. Part B of the policy notes that development proposals for education and child care facilities should:
 - 1) Locate facilities in areas of identified need.
 - 2) locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling.
 - 3) locate entrances and playgrounds away from busy roads, with traffic calming at entrances.
 - 4) link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to enable all children to travel actively to school (walk, cycle or travel by public transport).
 - 5) maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures.
 - 6) encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities, and between early years and health and social care providers.
 - 7) ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach.
 - 8) ensure that facilities incorporate suitable, accessible outdoor space.
 - 9) locate facilities next to parks or green spaces, where possible.
- 6.2.4 Part C of Policy S3 of the London Plan notes that development proposals should ensure that there is no net loss of education or childcare facilities, unless it can be demonstrated that there is no ongoing or future need.
- 6.2.5 Policy CS1.Z of Harrow's Core Strategy relates to 'Required Infrastructure'. It notes that proposals for new development will be required to demonstrate adequate capacity exists or can be secured both on and off site to serve the development. The development or expansion of physical or social infrastructure will be permitted

where it is needed to serve existing or proposed development, or required to meet projected future requirements. The loss of community facilities will be resisted unless adequate arrangements are in place for their replacement or the enhancement of other existing facilities.

- 6.2.6 Policy DM46 of the Council's Development Management Policies Local Plan relates to 'New Community, Sport and Education Facilities' Part B of the Policy notes that proposals for the provision of new community, sport, and educational facilities will be supported where:
 - a) they are located within the community that they are intended to serve;
 - b) subject to (a) they are safe and located in an area of good public transport accessibility or in town centres; and
 - c) there would be no adverse impact on residential amenity (see Policy DM1) or highway safety.
- 6.2.7 The proposed development is not considered to conflict with the interests of the above planning policy. The demotion of the existing education facility and rebuilding it with an improved building would provide improvement in facilities. Furthermore, the enhanced facility would vastly improve teaching conditions, and the overall student experience. The proposed building provides an additional 2,612m² of floorspace which would be vastly superior in terms of its aesthetics, offering a far more attractive environment for students to learn. The need for the building is considered to be justified.
- 6.2.8 The proposed development would serve the existing student base as well as improve staff numbers from 10 to 20 whilst also increasing the student base. The proposed building is located within the confines of an existing college, as such its public transport accessibility is not of significant importance, nevertheless, the development is promoting sustainable and healthy means of transport through the provision of cycle parking and through the various measures outlined within the Travel Plan. The proposed development is not considered to impact upon the safety of students, teachers, visitors, pedestrians and vehicles, furthermore it is not considered to unduly prejudice the residential amenity of neighbouring occupants, further assessment will be provided on this within the pertinent sections of this Committee Report.
- 6.2.9 The proposal seeks to include residential use on the fourth floor of the proposed building. The proposal would thereby meet the aims of policy H2 of the London Plan (2021), which supports development on smaller sites (less than 0.25 hectares). The London Plan states that small sites should play a greater role in increasing and diversifying London's housing supply and supporting small and medium sized contractors and developers. On this basis, the proposal to develop this site for residential purposes is considered to be acceptable in principle.
- 6.2.10 For the reason set out above, it is considered that the principle of this proposal meets the above policy requirements with regard to enhanced educational facilities and the overarching goal of housing choice and provision and the need to support economic activity and development. In light of all of the above, officers raise no objection to the principle of development.

6.3 Design, Character and Appearance of the Area

The relevant policies are:

- National Planning Policy Framework (2021)
- The London Plan 2021: D3, D4, D12
- Harrow Core Strategy 2012: CS1
- Harrow Development Management Polices Local Plan (2013): DM1, DM22, DM23
- Housing Design Standards LPG (2023)
- 6.3.1 Policy D3.D(1) of the London Plan states that development should in terms of form and layout, enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions. Policy D3.D(11) goes on to state that in terms of quality and character, developments should respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character. The Housing Design Standards LPG (2023) seeks to ensure that placemaking and the public realm; shared and ancillary facilities; and homes and private outside space are at the heart of all proposals for new developments.
- 6.3.2 Policy CS1.B of Harrow's Core Strategy notes that proposals that would harm the character of suburban areas and garden development will be resisted. All development shall respond positively to the local and historic context in terms of design, siting, density and spacing, reinforce the positive attributes of local distinctiveness whilst promoting innovative design and/or enhancing areas of poor design.
- 6.3.3 Policy DM1 of the Development Management Policies Local Plan states that all development proposals must achieve a high standard of design and layout. Proposals which fail to achieve a high standard of design and layout, or which are detrimental to local character and appearance, will be resisted.
- 6.3.4 Policy DM22 of the Development Management Policies Local Plan provides design guidance on trees and hard and soft landscaping for proposals. Part B of this policy provides an assessment framework on appropriate forms of hard and soft landscaping.

Design, Height and Scale

6.3.5 The proposals have been reviewed in depth by the Council's Design Officer who notes the existing Regent College building has low architectural merit. The current building frontage is set back from the street scene and a rear three-storey return to the building extends to the service lane at the rear of the site and faces rear

gardens of Beechcroft Avenue properties. It is also noted that the current building represents an under-development of this site and therefore the redevelopment of the site is welcomed. The demolition of this existing building is supported in favour of a higher density proposal which can better contribute to and animate Imperial Drive and provide betterment to the street scene through high-quality architectural design.

6.3.6 The height and scale of the proposed building would be comparable to that of other buildings within the site, it would not appear as an alien addition in context with surrounding buildings. The form and appearance of the proposed building would not be overly complex and would be appropriate for the proposed use. The proposed building would be visible from the street scene along Imperial Drive, however the setbacks proposed are considered appropriate. The building is not considered excessive it would be sited appropriately within the surrounding context. It is not considered to appear as unduly prominent and visually intrusive when viewed along the street scene.

Massing

- 6.3.7 However, the massing of the building does raise some concern particularly for residents located immediately adjacent to the site. There is some concern regarding the proximity of the ground and first floor rear massing of the building to rear garden boundaries of Beechcroft Avenue dwellings, which is creating some overbearing impact. The initially submitted drawings showed the proposed twostorey ground and first floor massing aligning the rear elevation of the existing building, resulting in greater massing facing Beechcroft Avenue rear gardens compared to the existing site circumstances. The applicants subsequently submitted revised drawings which set in the flanks of the first-floor elevation whilst maintaining the similar projection to the existing site circumstances. The distance between the rear elevation of proposed second and third floors with Beechcroft Avenue dwellings is comparable to that of the rear elevation of Broad House, aligning with its four-storey rear massing. As such, the overbearing impacts from this massing element are not considered to be significantly greater than for the adjacent Broad House. The proposed fourth floor massing is supported and is sufficiently set back and subsidiary in nature to not cause overbearing impacts.
- 6.3.8 It is considered the revisions to the proposed massing and scale results in the proposal being more appropriate for its plot size and the wider context. In principle the materials proposed for the mixed-use building would be considered acceptable. Notwithstanding the submitted information, a condition has been attached to ensure that samples be submitted for further consideration of the appropriateness of the appearance and quality of the materials.

Heritage Impacts

6.3.9 The proposal site is located within the setting of the grade II listed former Rayners Lane public house. The proposal is also in the setting of the Rayners Lane Conservation Area. The proposal has been reviewed by the Council's

Conservation Officer who notes that the existing building does to some extent fit in with the twentieth century context to the above heritage assets given its flat roofed design and scale. However, it makes a limited contribution towards the heritage assets. Therefore, on balance, a proposal for a flat roofed replacement at 5 storeys is considered to preserve the setting of these heritage assets in a similar manner.

6.3.10 As such, it is not considered that this would cause particular harm to the setting of the Conservation Area or Listed Building.

6.4 Residential Amenity

The relevant policies are:

- Harrow Core Strategy 2012:CS1
- Harrow Development Management Polices Local Plan (2013): DM1, DM2, DM27
- London Plan Policy (2021): D6
- "Housing Design Standards LPG (2023)"
- Residential Design Guide (2010)
- The London Plan Housing Supplementary Planning Guidance (2016)

Impacts on neighbouring properties

- 6.4.1 The Housing Design Standards LPG (2023) seeks to ensure that "Housing Design Standards LPG that "Visual privacy" and mitigations are sought to ensure residential amenities are protected. Furthermore, the document states: "Consideration should be given to the internal layout of homes, including vertical stacking, to reduce noise impacts (for example, between living rooms and bedrooms)". Policy DM1 of the DMP seeks to ensure that "proposals that would be detrimental to the privacy and amenity of neighbouring occupiers, or that would fail to achieve satisfactory privacy and amenity for future occupiers of the development, will be resisted".
- 6.4.2 The rear of the site adjoins a private servicing road and beyond this faces rear gardens and rear elevations of suburban dwellinghouses to Beechcroft Avenue. Private dwellings in closest proximity to the site, and therefore with greatest potential to be impacted are Nos. 78, 80, 82, 84, 86, 88, 92 and 94 Beechcroft Avenue. These dwellings and the ambulance station to the north are 2-storey in nature. Aside from this low-density pattern adjoining the north and east of the site, there is an immediate context of four to five storey buildings fronting Imperial Drive (Broad House; Carmine Court).

Impact to Nos. 78, 80, 82, 84, 86, 88, 92 and 94 Beechcroft Avenue

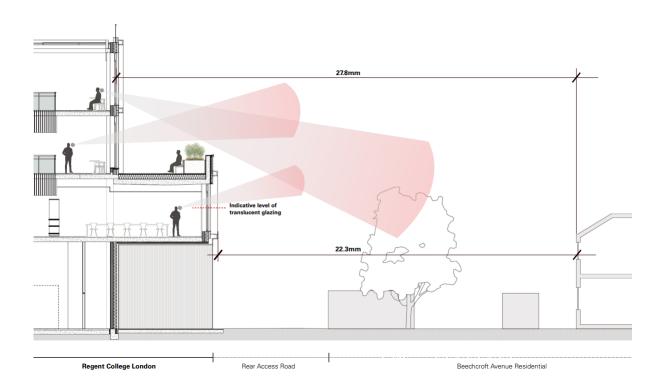
6.4.3 The proposals inevitably have an impact on the adjacent properties however it is noted that the existing site circumstances have an impact given the college building projects to the rear site boundary and has a width of approximately 10.72m and a height of 9.58m. The proposals cover the full width of the site and therefore bring

additional mass and scale. However, this mass is reduced to the rear of the first floor with the setback of the flank elevations resulting in a width of approximately 17.22m and a height of approximately 10.54m. It is proposed that these setbacks host terraces that can potentially look into the gardens of neighbouring properties. However, this has been reduced from a full width projection at first floor as initially proposed. As such, there is an increase in the width of the proposed building compared to the current situation, however, there is a modest reduction in height. Whilst an impact inevitably exists, on balance it is considered acceptable given the current site circumstances. The first-floor massing reductions satisfactorily reduce overbearingness to Beechcroft Avenue properties and rear gardens to the east of site. As a result of this reduction, the proposed massing is considered acceptable and is supported. There is a concern however about the potential overlooking from the flank terraces and therefore a condition will be added restricting the use to maintenance only.



- 6.4.4 There was also some concern over the amount of glazing proposed at first floor level which resulted in direct overlooking to rear gardens. However, the applicant has since amended the glazing at first floor by introducing windows that benefit from gradient translucency up to 1700mm from finished floor level thereby restricting direct overlooking into the residential properties. This solution is considered acceptable.
- 6.4.5 It is considered that the setback at second, third and fourth floor is considered acceptable. The second and third floor east elevation windows are sufficiently set back to create limited direct overlooking, while a small degree of perceived overlooking from these windows is considered acceptable and similar to that of the existing building to the south of site. There is some concern about overlooking from the rear terrace on the second floor. This is likely to create increased actual and perceived overlooking. However, it is considered that with an increased depth of planters in addition to perimeter seating, will mitigate overlooking from the second

floor terrace into neighbouring gardens. A condition will in added to ensure the final proposal is acceptable in these terms.



Residential Quality of Proposed Development

- 6.4.6 Policy D6 of the London Plan and the Housing Design LPG specify that boroughs should ensure that, amongst other things, 'housing development should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts'. It also sets out the minimum internal space standards for new dwellings. The use of these residential unit GIA's as minima is also reiterated in Appendix 1 of the Residential Design Guide SPD.
- 6.4.7 The proposed development includes the following:

	Proposed Size	Proposed GIA	Minimum GIA	Proposed Storage	Minimum Storage
Flat 1	1 bed 2 persons	50sqm	50sqm	3.3sqm	1.5
Flat 2	1 bed 2 persons	53sqm	50sqm	2.8sqm	1.5
Flat 3	1 bed 2 persons	61sqm	50sqm	2.6sqm	1.5
Flat 4	2 bed 4 persons	76sqm	70sqm	3.4sqm	2.0
Flat 5	2 bed 4 persons	75sqm	70sqm	3.1sqm	2.0

- 6.4.8 All the units either meet or exceed the minimum standards. The flats would provide a good standard of living accommodation given its spacious and functional layout with good outlook to the habitable rooms. All but one of the units are dual aspect and would therefore provide enhanced residential amenity. It is therefore considered that the proposed flats would provide a satisfactory standard of accommodation for the future occupiers in terms of floorspace.
- 6.4.9 All of the habitable rooms are provided with windows which allow for sufficient levels of natural light and adequate outlook. The floor to ceiling height for the flats would measure 2.8 metres which is considered to be significantly above the London Plan requirement for 2.5 metres resulting in a spacious form of accommodation. In regard to vertical stacking, ideally, bedrooms and living areas should not significantly overlap in order to minimise the potential for noise transfer between new homes. However, in this instance there is an educational use below and given that the proposal is for a new build, the development would need to comply with Building Regulations requirements for sound insulation measures to ensure there would be no unacceptable noise transmission. Therefore, the proposed layout of these units is considered acceptable on balance.
- 6.4.10 In terms of privacy and overlooking between the proposed units, the concerns would be limited in this regard. A separation distance of 17.8m would be provided between the rear facing flats whilst the front facing balconies are inset, with the exception of the southernmost unit, and therefore are considered to have good privacy.

Amenity Space

6.4.11 Regarding the private amenity space, the SPG requires a minimum of 5m² per 1-2 person dwelling and an extra 1m² for each additional occupant, and for balconies the SPG specifies minimum dimensions of 1.5m x 1.5m. Balcony spaces are provided for all but one of the proposed units.

	Balcony Sizes	Balcony Dimensions
Flat 1	8.9sqm	2.6 x 3.5
Flat 2	5.0sqm	2.8 x 1.7
Flat 3	11sqm	1.5 x 6.9
Flat 4	9.0sqm	2.3 x 4.2
Flat 5	10.0sqm	2.3 x 4.6

6.4.12 As shown on the table above, the balcony sizes and dimensions all exceed the minimum requirements. Overall, it is considered that the proposed development is likely to provide an acceptable level of amenity for future occupiers, subject to conditions

Secure by Design

6.4.13 The Designing Out Crime Officer has raised concerns regarding the crime preventing measures on site such as lighting, lockable cycle stores and boundary treatment. Therefore, in order to ensure the development is of a satisfactory level of safety and security, a condition to achieve Secure by Design accreditation has been attached.

6.5 Traffic, Parking and Servicing

The relevant policies are:

- Harrow Core Strategy 2012:CS1
- Harrow Development Management Polices Local Plan (2013):DM1, DM42, DM44, DM45
- London Plan (2021): T4, T5, T6
- 6.5.1 This site is within an area with a Public Transport Accessibility Level (PTAL) of 4/5 meaning access to public transport is considered to be moderate/good. The site is located approximately 200m from Rayner's Lane Underground Station, which provides good access to the wider area including destinations throughout central London, Uxbridge, Ruislip and Ealing. A northbound bus stop is located approximately 60m northwest of the site providing access to several destinations including Northwick Park Hospital and Harrow and Wealdstone station, a southbound bus stop is located approximately 80m south of the site providing access to destinations including Stanmore, Pinner, Hatch End and Ruislip stations. Given the District centre location, the proposed development would be car free with the provision of one disabled person's parking space.
- 6.5.2 It is proposed to provide four car parking spaces. The educational facility is essentially car free, to both staff and students however, two disabled parking bays will be for the use for those who require it. Two standard car parking spaces will be provided to the rear of the site, accessed from the service road, which will be for use by residents and will be allocated by the site management, with users required to display permits.
- 6.5.3 Minimum cycle parking standards are set out in London Plan 2021. For sixth form Colleges this requires one space per 8 FTE staff + 1 space per 8 students as long stay parking, plus one space per 100 students short stay parking. For Universities and Colleges, the standards require at least one space per 4 FTE staff + 1 space per 20 FTE students as long stay parking, plus one space per 7 students short stay parking. Based on proposals, it is estimated that the site would require 29 long stay and 60 short stay spaces. The London Plan (2021) sets out long term cycle parking requirements of 1.5 spaces per two-person, one-bedroom dwelling and two spaces for all other dwellings, plus two additional short stay spaces for visitors. This will equate to nine long term spaces, plus two short stay spaces.

- 6.5.4 The proposals provide 21 Sheffield-style cycle stands along the Imperial Drive frontage for short stay parking, accommodating 42 bicycles. An internal storage room for staff / student use will accommodate eighteen bicycles in either Sheffield or two-tier racks. An internal residential cycle store will be provided on the ground floor, accessed from the front lobby. The storage room will accommodate ten bicycles in either Sheffield or two-tier racks. Visitors will be able to use the new external cycle parking; The proposed level of cycle parking is less than the level required by the London Plan (2021) however it is considered to appropriate to meet the existing demand and usage will be monitored so that further parking can be provided should there be a demand for it.
- 6.5.5 The application has been reviewed by Transport for London and the Council's Highways Authority, both who have no objections subject to conditions. The Highways Officer does note that the redundant crossing at the front of Imperial Drive will need to be returned back to full height kerb. This will be added as an informative. It is under this context the highways matters are acceptable

6.6 Waste and Servicing

- 6.6.1 The proposed refuse stores are to be housed internally to the rear of the building whilst the cycle storage for educational use is also internally located to the rear of the building. The cycle stores to the residential is internally located in the lobby area to the north of the building. As the stores would not be readily visible from the street, it would not negatively impact the character and appearance of the street scene. A condition has been attached to ensure that the refuse and cycle store is secure and appropriate in its design and finish.
- 6.6.2 The application included a Delivery and Servicing Plan. Delivery drivers will be required to use the main roads to access the site, including Imperial Drive, the Ridgeway and the A404 Pinner Road, and not to use local side roads unless necessary. Vehicles delivering goods and servicing the proposed building are envisaged to be limited to light goods vehicles such as a transit-type van or similar for delivery of office and cleaning supplies and building maintenance.
- 6.6.3 In summary, subject to the above detailed conditions, the development would accord with the relevant policies of the development plan in terms of character and appearance as set as set out above.

6.7 Flood Risk and Drainage

The relevant policies are:

- The National Planning Policy Framework (2021)
- The London Plan (2021): SI 13
- Harrow's Core Strategy (2012): CS1
- Harrow Development Management Policies (2013): DM10

- 6.7.1 The site is located in a low risk Flood Zone 1 and within a critical drainage area of Harrow. The Council's Drainage officers have not objected to the application but have suggested conditions to deal with on-site drainage and water attenuation.
- 6.7.2 The Thames Water sewer records shows a public surface water sewer that runs along the service road, located to the rear of the building, meeting Vicarage Way to the north. Thames Water have been consulted and have recommended planning conditions. Subject to the drainage conditions, the proposal would accord with the relevant policies in relation to surface water drainage and surface water attenuation.

6.8 Landscaping, Urban Greening Factor and Biodiversity

- 6.8.1 A new scheme of hard and soft landscaping is proposed throughout the site, including additional planting at the various roof and terrace levels. It is noted that the site is largely covered by hardstanding and therefore the proposed landscaping is a welcomed addition. The site frontage will include planting of three new trees along the street boundary, as well as raised planters on the north and southern edges of the forecourt, which will also be resurfaced with permeable paving. New areas of green roof and planted terraces are provided at the second and fourth floor level and an area of green roof with photovoltaic panels have been provided at the roof level.
- 6.8.2 The proposals have been reviewed by the Council's Landscape Officer who welcomed the changes to the site frontage however noted that careful species selection would be required. Furthermore, Fastigiate trees may be considered more appropriate in the space available, to take account of the future growth and long-term ongoing management and maintenance.
- 6.8.3 The Landscape Officer also notes the strategy for proposed planting in the raised beds and green roofs is to be wildlife friendly which is acceptable in principle, however, the proposed plant species would require review, to ensure it is realistic and suitable for the allocated spaces. It is also noted that a hedgerow wildflower mix would be inappropriate for the location in the green roof and as such, would require review. Notwithstanding the above, the landscaping is deemed acceptable subject to conditions
- 6.8.4 The Urban Greening Assessment submitted with the application confirms that the development proposals incorporating the landscaping measures set out in the landscaping plans provided with the application would achieve an Urban Greening Factor (UGF) score of 0.3205, exceeding the target score of 0.3.
- 6.8.5 A Preliminary Ecological Appraisal (PEA) has been undertaken and has been provided with this planning application. The PEA notes that the site is of low ecological value with only common habitats present, the site also has negligible potential to support protected species with a low potential to support nesting birds and roosting bats. Various ecological enhancements have been proposed to improve the ecological value of the site, with the PEA concluding that subject to recommendations of the PA being adhered to the proposals stand to fully avoid ecological impacts and will secure net gains for biodiversity

- 6.8.6 A Biodiversity Net Gain assessment of the proposals utilising v 3.1 of the Biodiversity Metric was submitted as part of the application. Whilst habitat assessment based on a November survey isn't in accordance with best practice, this is unlikely to have been significant in this instance.
- 6.8.7 The PEA has been reviewed by the Council's Biodiversity Officer and notes the document recommends the provision of:
 - Wildlife friendly planting;
 - Vertical greening in the form of trellis systems;
 - Extensive biodiverse roofs on all suitable flat roof areas;
 - Invertebrate habitat features such as bee posts and habitat panels; and
 - Integrated bird and bat boxes within the built form.
- 6.8.8 The footprint of the proposed development occupies a much greater proportion of the red line area than the existing building, restricting such opportunities and it would appear that where such provision has been identified, this has been on an a posteriori basis, rather than being an integral part of the design process. No vertical greening has been identified and there are no definite proposals with regard to wildlife shelters.
- 6.8.9 The site survey was undertaken in November 2022. Whilst the site is largely covered in hard/sealed surface and there is no expectation of notable species being present it is likely that the site supports a number of other plant species which should not have been obvious or visible at this time. (It is also intriguing as to how the flat roof was observed with binoculars from below.) The PEA's 0.116 ha value appears to provide a more precise measure of the site's area than the 0.12 ha indicated elsewhere and is taken to be correct based on footprint measurements.
- 6.8.10 Overall the PEA presents a proportionate summary, and therefore no objections are raised on Biodiversity grounds subject to conditions.

6.9 Fire Safety

- 6.9.1 The relevant policies are:
 - National Planning Policy Framework (2021)
 - The London Plan (2021): D12 (Part A)
- 6.9.2 Policy D12 of The London Plan requires all development to meet standards of fire safety. Therefore, a condition has been attached to ensure the development meets this requirement prior to completion of damp proof course.

6.10 Energy and Sustainable Development

- 6.10.1 All major applications are required to achieve a 35% reduction (on site) in carbon dioxide emissions over the Building Regulations. Development should follow the hierarchy and policy guidance within Policy SI2 (Minimising Greenhouse Gas Emissions) of the London Plan (2021).
- 6.10.2 The application has been accompanied by both an Energy and Sustainability Statement. The proposed energy and sustainability measures include suitable Passive measures within the building envelope and services design to mitigate overheating and reduce cooling demand. The design of the building ensures very little horizontal distribution of heated pipework. Additional measures include approximately 160m² of photovoltaic panels as a renewable energy source, which is estimated to reduce electricity reliance by up to 20,325kWh per year.
- 6.10.3 This combined with high energy efficiency standards in the built fabric and smart energy efficient systems, with a projected reduction of 62% in CO2 emissions, for the residential element, and 35% emissions for the non-residential element equating to a 45% overall reduction is Carbon emissions. The remainder of the balance would normally be sought as a carbon off-set payment which the report identifies as being £20,339. This will be secured by a S106 legal agreement.
- 6.10.4 The site is outside of the Heat Network Priority Area, and there are no proposed or planned available in the immediate area. As such, low carbon technology to provide heating to the residential and non-residential elements are proposed separately.
- 6.10.5 Subject to the proposals following through on the Be lean, Be clean, Be Green model, the proposal is considered acceptable in terms of energy and sustainability.

6.11 Air quality and Ground Contamination

- 6.11.1 The application has been accompanied by an Air Quality Assessment, which states that the proposed development is fully compliant with London's 'Air Quality Neutral' guidance for buildings and transport.
- 6.11.2 Therefore, the modelling indicates that both the long term and short-term air quality standards are within targets set by the Air Quality Standards Regulations 2010 and no mitigation would be required, other than dust management measures as part of a Construction and Logistics Plan. The report has been reviewed by the Council's Environmental Health Team and no concerns are raised subject to suitable conditions of consent.
- 6.11.2 The site has been assessed as having a low for potential for contamination, and moderate to low for contamination within poor quality Made Ground. However, the report also states that a more intrusive investigation is necessary to quantify potential risks and remaining uncertainties that have been identified. Therefore, a pre-commencement condition is recommended for the submission of an investigation and risk assessment.

6.12 **Noise**

- 6.12.1 A noise report has been submitted to identify whether the site is suitable for a mixed educational and residential building. The report also considers the noise profile of proposed external plant on neighbouring residential properties.
- 6.12.2 The report identified that the primary source of noise is road traffic from Imperial Drive to the west. The report does note that the proposed design and structural materials will enhance the building fabric and improve noise leakage from within the building in regard to the educational use. In terms of residential, the report recommends the implementation of 'good acoustic design' principles which would seek to assist with the provision of satisfactory internal and external noise levels
- 6.12.3 The report makes a number of recommendations in relation to standard of double glazing and ventilation systems. The specific type of external plant is not yet known and the report therefore recommends suggested maximum noise levels.
- 6.12.4 The environmental health team have reviewed the report and raise no concerns subject to suitable conditions of consent to ensure appropriate mitigation is installed in accordance with that suggested within the report.
- 6.12.5 As such, conditions of consent will be imposed requiring that necessary mitigation measures to comply with the noise report are installed and maintained. Additionally, the condition of consent will require that a verification report is submitted to confirm appropriate mitigation has been installed and that internal noise levels (and impact from installed acoustic plant on neighbouring noise sensitive facades) are acceptable prior to occupation.

6.13 Environmental Impact Assessment

6.13.1 The requirement of the Environmental Impact Assessment (EIA) Regulations 2017 is based on the likelihood of significant environmental effects arising from a new development and are divided into Schedule 1 and Schedule 2 applications under the EIA Regulations. Schedule 1 would normally constitute developments that would have significant effects on the environment such as major chemical projects or ground and air transport infrastructure. Schedule 2 consists of other forms of developments that are dealt with under a threshold approach. The proposed development does not fall within the thresholds for EIA development under Schedule 2. Therefore, an Environmental Impact Assessment is not required.

7.0 CONCLUSION AND REASONS FOR APPROVAL

7.1 The proposal would contribute to the variety of housing stock in the borough. The proposed development would appropriately relate to the site, local context, massing and architectural appearance and would bring forward enhanced educational facilities and housing provision of a satisfactory layout and design to ensure that the future occupiers would benefit from an acceptable standard of living accommodation.

- 7.2 The redevelopment of the site would provide a sustainable mixed use development of a good design with active frontage to Imperial Drive. The building would provide a modern, contemporary design that responds positively to the local context and contributes to attractive streetscape, The layout and orientation of the buildings to neighbouring properties is considered to be satisfactory to protect the amenities of the neighbouring occupiers whilst encouraging a modal shift towards more sustainable modes of travel.
- 7.3 For all the reasons considered above, and weighing up the development plan policies and proposals, and other material considerations including comments received in response to notification and consultation as set out above, this application is recommended for grant.

APPENDIX 1: Conditions And Informatives

Conditions

1. Timing

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

REASON: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990.

2. Approved Plans and Documents

Unless otherwise agreed in writing by the local planning authority, the development hereby permitted shall be carried out, completed and retained in accordance with the following documents and plans:

3119-JWA-00-00-DR-A-1011 Rev P03, 3119-JWA-00-01-DR-A-1012 Rev P02, 3119-JWA-00-02-DR-A-1013 Rev P02, 3119-JWA-00-03-DR-A-1014 Rev P02, 3119-JWA-00-04-DR-A-1015 Rev P02, 3119-JWA-00-B1-DR-A-1010 Rev P02, 3119-JWA-00-RF-DR-A-1016 Rev P03, 3119-JWA-ZZ-00-DR-A-1020 Rev P02, 3119-JWA-ZZ-01-DR-A-1024 Rev P01, 3119-JWA-ZZ-02-DR-A-1021 Rev P02, 3119-JWA-ZZ-04-DR-A-1022 Rev P02, 3119-JWA-ZZ-RF-DR-A-1023 Rev P03, 3119-JWA-ZZ-ZZ-DR-A-0012 Rev P03, 3119-JWA-ZZ-ZZ-DR-A-0112 Rev P03, 3119-JWA-ZZ-ZZ-DR-A-3010 Rev P02, 3119-JWA-ZZ-ZZ-DR-A-3011 Rev P02, 3119-JWA-ZZ-ZZ-DR-A-3012 Rev P03, 3119-JWA-ZZ-ZZ-DR-A-3013 Rev P03, 3119-JWA-ZZ-ZZ-DR-A-4010 Rev P02, 3119-JWA-ZZ-ZZ-DR-A-4011 Rev P03, 3119-JWA-ZZ-ZZ-DR-A-0111 Rev P01, 3119-JWA-00-00-DR-A-1911 Rev P01, 3119-JWA-00-01-DR-A-1912 Rev P01, 3119-JWA-00-02-DR-A-1913 Rev P01, 3119-JWA-ZZ-ZZ-DR-A-3913 Rev P01, Planning Statement dated January 2023, Design & Access Statement dated May 2023, Transport Assessment (incl. Parking and Service Details, Waste Management Strategy dated January 2023. Travel Plan dated January 2023, Outline Construction Logistics Plan dated January 2023, Air Quality Assessment dated January 2023, Daylight / Sunlight Assessment dated January 2023, Ecological Impact Assessment (including Biodiversity Net Gain and Urban Greening Factor) dated January 2023, Flood Risk Assessment (FRA) including Sustainable Drainage Strategy (SUDS) dated January 2023, Sequential Assessment dated January 2023, Sustainability Statement dated January 2023, Energy Assessment dated December 2022, Community Involvement, Construction of Environmental Management Plan, Fire Strategy dated January 2023, Aviation Safeguarding Assessment, Delivery and Service Management Plan dated May 2023, Built Heritage Statement dated November 2022, Contaminated Land Assessment dated January 2023, Noise Assessment dated December 2022, Geo-Environmental Desk Study dated October 2022; Aviation Safeguarding Assessment January 2023, Archaeological Desk based Assessment dated January 2023

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

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 Transport for London – www.tfl.gov.uk. 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;
- 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; and
- 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. 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 levels of the site, have been submitted to, and approved in writing by, the local planning authority. The development shall be carried out in accordance with the approved details and shall thereafter be retained.

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, in accordance with policies DM1 of the Councils Development Management Policies Local Plan 2013. This is a

PRE-COMMENCEMENT CONDITION to ensure adequate levels before the development commences on site.

5. <u>Disposal of Surface Water/Surface Water Attenuation</u>

The development (other than demolition works) hereby permitted shall not commence until works for the disposal of surface water and 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 these approved details and shall thereafter be retained. REASON: To ensure that adequate drainage facilities are provided and to reduce and mitigate the effects of flood risk in accordance with policy DM10 of

the Councils Development Management Policies Local Plan 2013.

6. <u>Disposal of Sewage</u>

The development (other than works of demolition) hereby permitted shall not commence 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 these approved details and shall thereafter be retained.

REASON: To ensure that adequate drainage facilities are provided in accordance with policy DM10 of the Councils Development Management Policies Local Plan 2013. This is a PRE-COMMENCEMENT CONDITION to ensure adequate sewage disposal details are agreed before the development commences on site.

7. <u>Cycle Storage</u> For Educational Use

The development hereby permitted shall not commence beyond damp proof course level until details of secure shelters, racks, dimensions and location of a minimum of 42 short stay cycle parking spaces and 18 long stay spaces shall be submitted to and approved in writing by the local planning authority. The cycle storage shall be made available prior to occupation and shall be retained thereafter.

REASON: To ensure the satisfactory provision of safe cycle storage facilities, to provide facilities for all the users of the site and in the interests of highway safety and sustainable transport, in accordance with policy T5 of The London Plan 2021 and policy DM 42 of the Harrow Development Management Policies Local Plan (2013).

8. <u>Cycle Storage For Residential Use</u>

The development hereby permitted shall not commence beyond damp proof course level until details of secure shelters, racks, dimensions and location of a minimum of 10 long stay spaces shall be submitted to and approved in writing by the local planning authority. The cycle storage shall be made available prior to occupation and shall be retained thereafter.

REASON: To ensure the satisfactory provision of safe cycle storage facilities, to provide facilities for all the users of the site and in the interests of highway safety and sustainable transport, in accordance with policy T5 of The London Plan 2021 and policy DM 42 of the Harrow Development Management Policies Local Plan (2013).

9. Waste Management Strategy

The development hereby permitted shall not commence beyond damp proof course level, until details of a waste management plan have been submitted to and approved in writing by the Local Planning Authority. The waste management plan shall be carried out in accordance with the approved details and shall thereafter be retained.

REASON: In the interest of sustainable waste management of the site, in accordance with policy DM45 of the Councils Development Management Policies Local Plan 2013.

10.. Materials

Notwithstanding the details shown on the approved drawings, the development hereby permitted shall not commence beyond damp proof course level until details and samples of the materials to be used in the construction of the external surfaces noted below shall be made available to view on site, and agreed in writing by, the local planning authority:

- 1. facing materials for the building, including brickwork and spandrel detail; windows/ doors:
- 2. boundary fencing including all pedestrian/ access gates;

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

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

12. <u>Landscaping</u>

The development hereby approved shall not be commenced beyond damp proof course level until a scheme for the hard and soft landscaping details for the ground level areas and the terraced areas including raised planters have been submitted to, and agreed in writing by, the local planning authority. Soft landscaping works shall include: planting plans (at a scale not less than 1:100), written specification of planting and cultivation works to be undertaken and schedules of plants, noting species, plant sizes and proposed numbers / densities and an implementation programme. Tree planting along the boundaries adjacent to the car park and screening around carparking area with hedge planting. The hard surfacing details shall include details of all furniture, boundary treatment, samples to show the texture and colour of the materials to be used and information about their sourcing/manufacturer.

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

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes to the creation of a high quality, accessible, safe and attractive public realm and to ensure a high standard of design, layout and amenity in accordance with policy D3 The London Plan (2021), policy CS.1B of the Harrow Core Strategy (2012) and policy DM22 of The Development Management Policies Local Plan 2013.

13. <u>Landscaping Implementation</u>

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, 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 authority agrees any variation in writing.

REASON: To safeguard the appearance and character of the area and to enhance the appearance of the development in accordance with Policy DM22 of The Development Management Policies Local Plan 2013.

14. Landscaping Management Plan

Notwithstanding the details requested above in condition 11, prior to the occupation of the development, a Landscape Management Plan and Landscape Maintenance plan including long term design objectives, management responsibilities and maintenance schedules for all landscape areas, including the communal hard and soft landscape areas shall be submitted and approved

by the local planning authority. The long term Landscape Management Plan for the whole of the proposed development will ensure the future success of the development, including the long term aims and objectives for all the external areas. The management and maintenance plan shall be implemented in accordance with the details approved, in perpetuity.

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

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes to the creation of a high quality, accessible, safe and attractive public realm and to ensure a high standard of design, layout and amenity in accordance with policy D3 of The London Plan (2021), policy CS.1B of the Harrow Core Strategy (2012) and policy DM22 of The Development Management Policies Local Plan 2013.

15. Refuse storage

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

REASON: To maintain the appearance of the development and safeguard the character and appearance of the area.

16. <u>Satellite Dishes</u>

Prior to the first occupation of the development, 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 relevant phase and shall be retained thereafter. No other television reception equipment shall be introduced onto the walls or the roof of the building without the prior written approval of the Local Planning Authority.

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

17. <u>Permeable Paving</u>

Before the hard surfacing hereby permitted is brought into use the surfacing shall EITHER be constructed from porous materials, for example, gravel, permeable block paving or porous asphalt, OR provision shall be made to direct run-off water from the hard surfacing to a permeable or porous area or surface within the curtilage of the site.

REASON: To ensure that adequate and sustainable drainage facilities are provided, and to prevent any increased risk of flooding. In accordance with policy DM10 of the Councils Development Management Policies Local Plan 2013.

18. Change of Use (flats)

The flats hereby permitted shall be used for Class C3 dwellinghouse(s) only and notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking or reenacting that Order with or without modification), no development within Schedule 2, Part 3, Class L shall take place

REASON: To enable the Local Planning Authority to fully consider the effects of development normally permitted by the Town and Country Planning (General Permitted Development) Order 2015 to maintain mixed, balanced, sustainable and inclusive communities and in the interests of residential and visual amenity in accordance with Policy DM1 of the Harrow Development Management Policies 2013, Policy CS1(B) of the Harrow Core Strategy 2012, Policy D1 of the London Plan 2021 and the Core Planning Principles of the National Planning Policy Framework 2021.

19. <u>Permitted Development Restriction</u>

No development which would otherwise fall within Classes ZA, A and A.1, in Part 20 of Schedule 2 to that Order shall be carried out in relation to the terraced dwellinghouses hereby permitted without the prior written permission of the local planning authority.

REASON: To safeguard the character of the area by restricting the amount of site coverage and size of the dwellinghouse in relation to the size of the plot and availability of amenity space and to safeguard the amenity of neighbouring residents, in accordance with policy DM 1 of the Harrow Development Management Policies Local Plan (2013).

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, in accordance with Policy D11 of the London Plan (2021) and Section 17 of the Crime & Disorder Act 1998.

21. Accessible Units

The flats hereby permitted shall be constructed to the specifications of: "Part M, M4(2), Category 2: Accessible and Adaptable Dwellings" of the Building Regulations 2013 and thereafter retained in that form.

REASON: To ensure that the development is capable of meeting 'Accessible and Adaptable Dwellings' standards in accordance with Policy D7 of The London Plan 2021, policy CS1.K of The Harrow Core Strategy 2012 and policies DM1 and DM2 of the Development Management Policies Local Plan 2013.

22. Piling Method Statement

No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

REASON: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure

23. Car Parking Design and Management Plan

The development hereby permitted shall not be occupied until 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 general 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 and the mechanism for converting passive provision to active should demand increase.
- b. Details of Disabled persons parking spaces in accordance with the levels set out in Table 10.6 of the London Plan 2021. The plan should outline the mechanism for converting standard spaces to disabled parking should demand increase.
- Mechanism for increasing the number of general spaces that have an 'active' electric vehicle charging point if monitoring demonstrates additional demand.

- d. Details of the allocation and management of the general and accessible car parking spaces.
- e. Details of monitoring, management and enforcement procedures for parking within the site.

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).

Biodiverse Roof Details

The development (other than demolition works) hereby permitted shall not commence until full details of biodiverse/bio-solar roof provision within the development have been submitted to and approved in writing by the Local Planning Authority. The submitted information shall include but not be limited to:

- identification of the roof areas to be used for the provision of biodiverse/bio-solar roofs;
- b. details of the roof build up, including water reservoirs, substrate, planting schedules/seed mix(es) to include at least 20 native flower species making up a minimum of 60% of the plant cover, shelter and breeding locations for a range of invertebrate species, plans, details and sections as appropriate;
- details of the maintenance to be undertaken during establishment including irrigation and remedial interventions in response to likely risks;
 and.
- d. the engineering tolerances of the design being such that they would support a waterlogged biodiverse roof with a substrate depth ranging between 80 and 200 mm with a least 50% of each roof area having a minimum substrate depth of 150mm, together with the weight of the vegetation and water reservoir.

The details will need be specific to the submitted proposals and development shall be carried out in accordance with the details so agreed and shall be maintained thereafter.

REASON: To ensure that the development makes appropriate provision for the protection, enhancement, and effective management of biodiversity and green infrastructure within the site and surrounding area in accordance with Policy DM 21 of the Harrow Development Management Polices Local Plan (2013), the London Plan (2021) and the National Planning Policy Framework (2021).

25. First Floor Terraces

The proposed first floor rear terraces shall only be used for the purposes of maintenance and will not be used as a terrace/ roof garden or similar amenity

area without the grant of further specific permission from the local planning authority.

REASON: To safeguard the residential amenities of neighbouring residents, in accordance with Policy DM1 of the Harrow Development Management Policies Local Plan (2013).

26. Fire Safety

The development herein approved shall not progress above damp proof course until a Fire Safety Statement has been 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:

- 1) identify suitably positioned unobstructed outside space: a) for fire appliances to be positioned on b) appropriate for use as an evacuation assembly point;
- 2) 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 systems and passive and active fire safety measures:
- 3) is constructed in an appropriate way to minimise the risk of fire spread;
- 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users;
- 5) 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; and
- 6) 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 D12A of the London Plan (2021).

27. Flues and pipework

Other than those shown on the approved drawings, no soil stacks, soil vent pipes, flues, ductwork or any other pipework shall be fixed to the elevations of the buildings hereby approved.

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

28. Use Class Restrictions

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any order revoking and re-enacting that order with or without modification), no change of use falling under Classes M, MA, N, O or P in Part 3 of Schedule 2 of that Order shall take place within the educational establishment and it shall only operate under Class F.1 of the Use Class Order 1987 (as amended) unless prior written permission of the local planning authority is sought.

REASON: To ensure a suitable use operates within the space given over to the educational use and that space shall not be converted to a poor quality residential unit.

29. Lighting

The development hereby approved shall not progress beyond damp proof course level until details of the lighting of all external areas (including any undercroft area) within the site, including:

- a) locations, lighting design, lighting details, specification, elevations, light spillage and lighting levels
- b) details of baffles, and filters to be employed, taking account of the provision of artificial shelters for birds, bats and invertebrates in suitable locations so as to avoid adverse impact on the habitat provided for these species.

The details shall be submitted to the Local Planning Authority in writing to be agreed. The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To ensure that the development incorporates lighting that contributes to Secured by Design principles, achieves a high standard of residential quality and does not have an adverse impact on ecology and species habitat.

30. Boundary Treatment

The development hereby permitted shall not be occupied until a plan indicating the positions, design, materials and type of boundary treatment to be erected for front, side and rear boundaries, the vehicular access and all other boundary treatments has been submitted to, and approved in writing by, the local planning authority. The boundary treatment shall be completed before the development is occupied. The development shall be carried out in accordance with the approved details and shall thereafter be retained.

REASON: To safeguard the amenity of neighbouring residents and the character of the locality in accordance with policy DM 1 of the Harrow Development Management Policies Local Plan.

INFORMATIVES:

1. Policies

The following policies and guidance are relevant to this decision:

National Planning Policy Framework (2021)

The London Plan 2021: D1, D3, D4, D5, D6, D7, D8, D11, D12, G6, H1, H9, H10, S1 12, T5, T6.1, SI 13

Harrow Core Strategy 2012: CS1

Development Management Policies Local Plan 2013: DM1, DM2, DM7, DM10, DM20, DM21, DM22, DM27, DM42, DM44, DM45, DM47

Relevant Supplementary Documents:

Supplementary Planning Document: Sustainable Building Design (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)

Residential Design Guide Supplementary Planning Document (2010)

Housing Design Standards LPG (2023)

2. Considerate Contractor Code of Practice

The applicant's attention is drawn to the requirements in the attached Considerate Contractor Code of Practice, in the interests of minimising any adverse effects arising from building operations, and in particular the limitations on hours of working.

3. 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 CLG website:

http://www.communities.gov.uk/documents/planningandbuilding/pdf/133214.pdf

Tel: 0870 1226 236 Fax: 0870 1226 237

Textphone: 0870 1207 405

E-mail: communities@twoten.com

4. 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.

5. London Mayor's CIL Charges

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 £25,752.60. 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

6. Harrow Council CIL Charges

Harrow has a Community Infrastructure Levy which applies Borough wide forcertain developments of over 100sqm gross internal floor space. Harrow's Charges are:

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

Hotels (Use Class C1), Residential Institutions except Hospitals, (Use Class C2), Student Accommodation, Hostels and HMOs (Sui generis) - £55 per sqm; Retail (Use Class A1), Financial & Professional Services (Use Class A2), Restaurants and Cafes (Use Class A3) Drinking Establishments (Use Class A4) Hot Food Takeaways (Use Class A5) - £100 per sqm All other uses - Nil.

The Provisional Harrow CIL liability for the application, based on the Harrow CIL levy rate for Harrow of £110/sqm is £47,213.10

This amount includes indexation which is 323/224.

The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing). The CIL Liability is payable upon the commencement of development. You are advised to visit the planningportal website where you can download the relevant CIL Forms. Please complete and return the Assumption of Liability Form 1 and CIL Additional Information Form 0.

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

https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf
If you have a Commencement Date please also complete CIL Form 6:
https://ecab.planningportal.co.uk/uploads/1app/forms/form_6_commencement
notice.pdf

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

7. 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 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

8. <u>Liability For Damage to Highway</u>

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.

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 (2021) 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 SI 13 of the London Plan (2021)_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. <u>Thames Water</u>

The applicant can contact Thames Water developer services by email: developer.services@thameswater.co.uk or by phone: 0800 009 3921 or on Thames Water website www.developerservices.co.uk for drainage connections consent.

11. Fire Safety Statement

The submission/approval of the Fire Safety Statement does not replace the need for building regulation approval in relation to fire safety, nor does it convey or imply any approval under those regulations.

CHECKED

Orla Murphy / Head of Development Management

6th July 2023

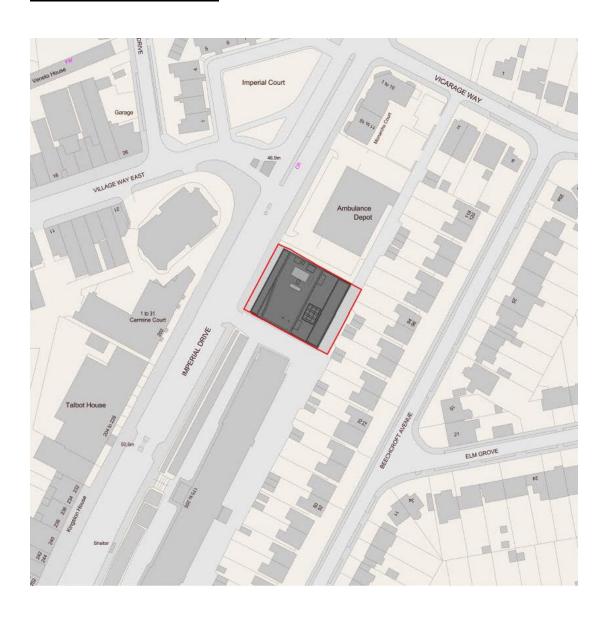
Viv Evans

Chief Planning Officer

VEvans.

6th July 2023

APPENDIX 2: SITE PLAN



APPENDIX 3: SITE PHOTOS



1 | View looking south-east towards rear of site



2 | View looking south-west towards existing building main entrance



4 | View looking north-west from rear of site



5 | View looking north-east from Right of Way



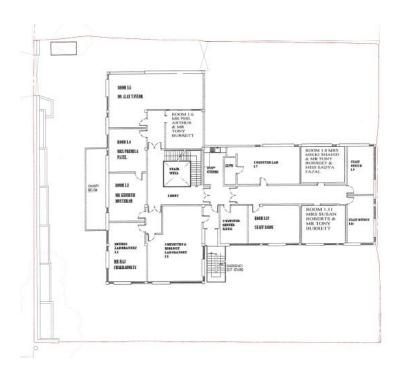
7 | View facing the site from Imperial Drive (looking south-east)

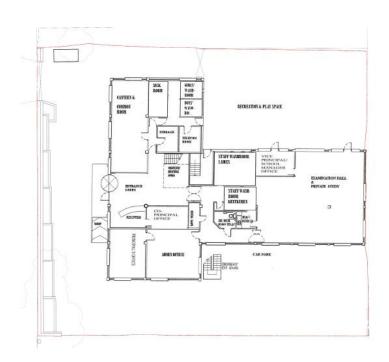


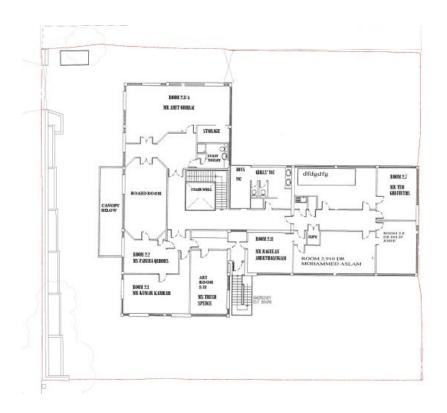
8 | View looking south towards existing main entrance

APPENDIX 4: PLANS AND ELEVATIONS

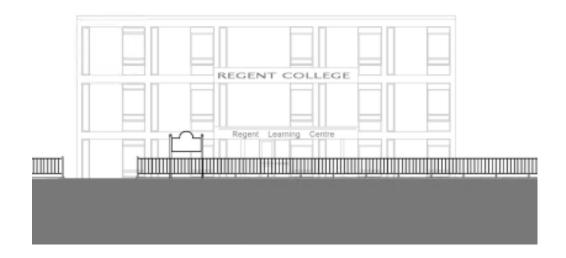
Existing Site and Floor Plan







Existing Elevations



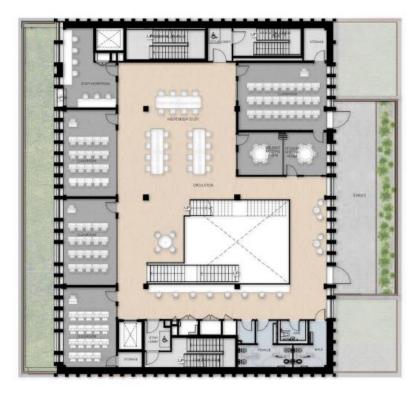
Proposed ground floor



Proposed first floor



Proposed second floor



Proposed Third Floor

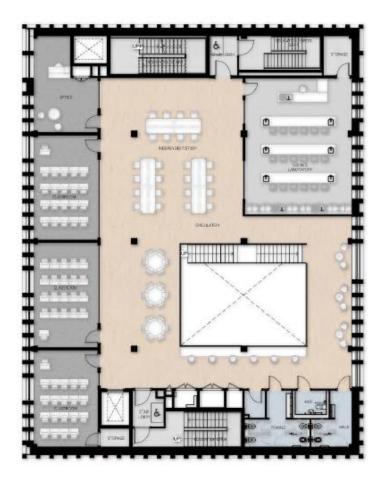




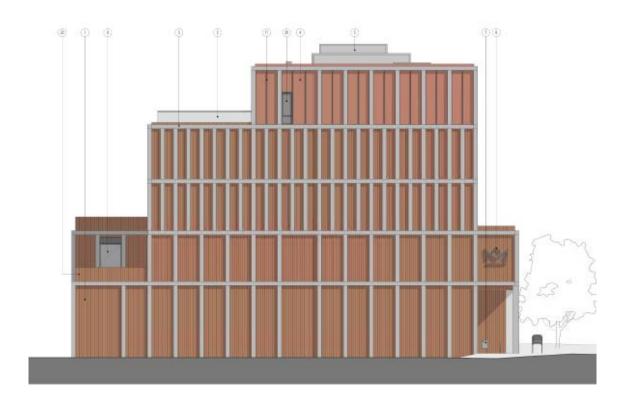
Image of Proposed Front Elevation



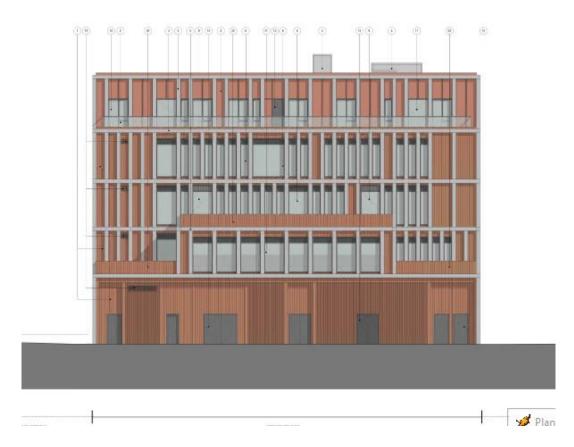
Proposed Front Elevation



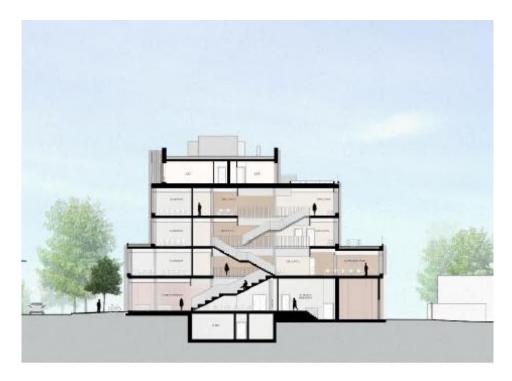
Proposed Flank Elevation



Proposed Rear Elevation



Proposed Sections



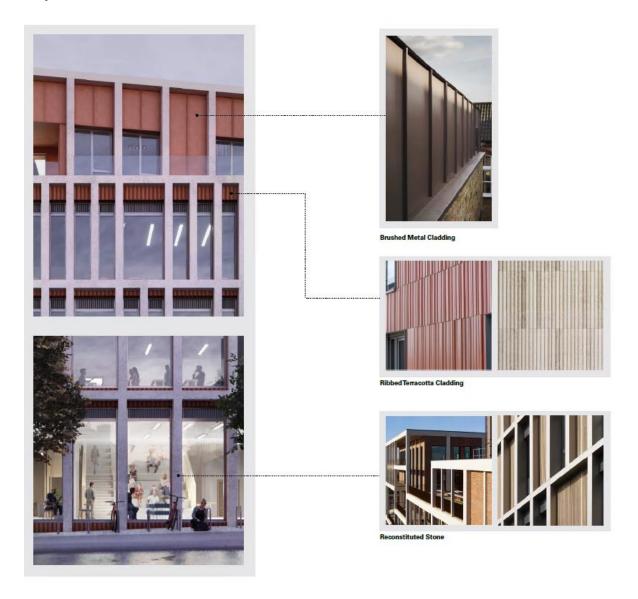
Proposed Images







Façade Treatment



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