
Items: 1/01

**GOVERNMENT BUILDINGS, HONEYPOT P/2317/06/CFU/RP1
LANE, STANMORE**

Ward CANONS

REDEVELOPMENT TO PROVIDE 816 RESIDENTIAL UNITS (INCLUDING 40% AFFORDABLE HOUSING) 959 SQ M CLASS A1/A2/A3/A4/A5/D1 & D2 FLOORSPACE; 7927 SQ M OF B1 (a), (b), (c) FLOORSPACE INCLUDING A BUSINESS INCUBATOR CENTRE; CREATION OF A NEW ACCESS ONTO WHITCHURCH LANE; ASSOCIATED FLOOD ALLEVIATION, LANDSCAPING, CAR PARKING AND HIGHWAY WORKS (DUPLICATE APPLICATION)

Applicant: BERKELEY URBAN RENAISSANCE LTD & DOMINION HOUSING GROUP LTD

Agent: TURLEY ASSOCIATES

Items: 1/02

**LAND ADJ. EDGWARE BROOK & P/2246/06/COU/RP1
WHITCHURCH LANE, HONEYPOT LANE,
STANMORE**

Ward CANONS

NEW PEDESTRIAN ACCESS ROUTE AND ASSOCIATED LANDSCAPE WORKS (AS PART OF THE COMPREHENSIVE DEVELOPMENT OF THE FORMER GOVERNMENT OFFICE AND DVLA SITE) (DUPLICATE APPLICATION)

RECOMMENDATION

Plan Nos: PL001, 002, 003, 004, 05, 06, 10, 11, 12, 13, 14, 20, 21, 22, 23, 24, 30, 31, 32, 33, 34, 40, 41, 42, 43, 44, 50, 51, 52, 53, 54, 59, 60, 61, 62, 63, 64, 101, 102, 110, 111, 112, 1120, 121, 122, 130, 131, 140, 141, 142, 143, 150, 160, 180

Had the applicant not appealed against the failure of Harrow Council to determine the applications within the statutory period, the Committee is recommended to consider what decision it would have made on the basis of the available information as set out below:

Should the Committee decide that it would have approved the application, appropriate conditions and heads of terms for a S106 agreement will be submitted to the next committee.

Should the committee decide it would have refused the applications, appropriate reasons should be recorded.

FOR DECISION

MAIN CONSIDERATIONS AND POLICIES (2004 UDP)

- 1) Quality of Design
- 2) Housing Provision and Housing Need
- 3) Re-use of Previously Developed Land
- 4) Designated Employment Areas
- 5) Sustainable Design and Construction
- 6) UDP Proposal Site 27
- 7) Residential Density
- 8) Affordable Housing
- 9) Standard of Design and Layout
- 10) Amenity and Playspace
- 11) Flood and Drainage Issues
- 12) Biodiversity
- 13) Impact on Local Infrastructure
- 14) Traffic Impact and Parking
- 15) The Footpath Application
- 16) Section 106 Issues
- 17) Consultation Responses

INFORMATION

a) Summary

Statutory Return Type: Major - Housing

Site Area: 6.2ha

Habitable Rooms: 2344

Density: 130 dpha 385 hrpha

Note that this is a mixed-use development and that within the site other uses will be present. There is no agreed method of measuring the density of mixed-use schemes.

Car Parking: Standard: 1135 (maximum)

Justified: 722

Provided: 722 (63%)

Council Interest: None in the main site

Freehold of footpath site (common land)

b) Site Description

- This is an irregular-shaped site previously used for Government offices. 6,190 sq.m. of empty offices remain on site the rest of the land being vacant. The main access was from Honeypot Lane and secondary access by foot was to Whitchurch Lane emerging opposite the entrance to Canons Park station.
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Items 1/03 & 1/04 : P/2317/06/CFU & P/2246/06/COU continued/...

- The north boundary of the site abuts the end of the rear gardens of houses standing on the south side of Whitchurch Lane. Going clockwise, the east boundary is formed with a LUL sub station and then the railway embankment. To the south lies the Parr Road employment area and to the west Honeypot Lane and common land through which flows the Edgware Brook. Beyond the brook are two modest housing areas, Bramble Close and Amber House (on the site formerly occupied by The Green Man PH).
- Part of the site lies within the Environment Agency's designated floodplain for the Edgware brook.

c) Proposal Details

- Mixed-use scheme of housing as described in the description of the development above. The various uses are outlined below followed by a description of the form of the development.
- Access is provided from Honeypot Lane, in the form of an improved junction located in the same position as the existing access. A second access is provided from Whitchurch Lane by the demolition of nos.276/278 Whitchurch Lane. Internal arrangements will prevent traffic 'rat-running' through the site.
- The housing comprises 816 homes being 56 houses and 760 flats. All the dwellings are designed to Lifetime Home Standards, have secure cycle parking and achieve a minimum EcoHomes rating of 'Good'.
- The 56 houses provide 2 x 5 bedroom homes, 41 x 4 bedroom homes and 13 x3 bedroom homes specially designed for wheelchair users. All are for social renting.
- Of the 760 flats, 557 are for sale, 21 are for social renting and 182 for shared ownership and low cost home ownership.
- The breakdown of the size of the flats is as follows:

Size of flat	studio + 1-Bed	2-Bed	3-Bed	Total
No of affordable	77	106	20	203
No of market units	296	189	72	557
Total	373	295	92	760

The percentage division into 40% affordable (19% social rented and 21% shared ownership and low cost) and 60% market sale has been calculated using habitable rooms.

Items 1/03 & 1/04 : P/2317/06/CFU & P/2246/06/COU continued/...

- The design has taken into account the Council's refuse and recycling strategy to ensure recycling and ease the collection of waste. The design criteria are that no resident shall carry waste more than 30m to a designated store at which sorting will take place. The refuse collectors shall not have to move bins more than 10 m and refuse freighters shall not have to reverse more than 12m (ie 1.5 x length of the freighter).
- The proposed community building contains: 959 sq m and the uses are to give flexibility in the use of the building including retailing and the sale of hot food of some 500 sq m, on the ground floor with community rooms on the floor above of some 400 sq m with residential units above the first floor.
- The 7,927 sq m of B1 floorspace is to provide a Business Incubator Centre and 'Move On' space for small business to start and succeed in Harrow. It is provided to meet a strategic employment need. Approx 5,000 sq m (GFA) will provide the start up or incubation space with units of between 30 to 100 sq m being available to new firms. To ensure that successful start-ups are not faced with accommodation issues, 3,000 sq m (GFA) of 'Move On' space is to be provided as well, to enable expansion.
- Other elements of the development include the provision of a footpath (subject to the second application) leading NW alongside the brook to the junction of Whitchurch Lane and Honeypot Lane, a play space within the family housing area, an energy centre housing the centralised combined heat and power plant and two electrical sub stations.
- Moving on to the form of the development, it is predominantly four storey, with three storey elements linking the four storey blocks.
- The housing to the rear of Whitchurch Lane properties is three storeys with individual gardens backing onto the gardens of the houses in Whitchurch Lane.
- Along the Parr Road industrial area boundary is proposed a four storey building which will accommodate the Business Incubator Centre (BIC) and 'move-on' space which will face into the site. To the rear, between the employment use and Parr Road, four storeys of car parking is proposed to provide for both the residential and business uses. No parking space is provided throughout the major part of the site, with the exception of the family houses on the northern boundary which have curtilage parking.
- There will be a clear definition between private and public open space. The houses have their own gardens, the blocks of flats have communal garden areas and to the west joining the common land through which the brook flows, two areas of additional public space are proposed. A third crescent shaped public space is shown in front of the community building. It is within this area that the public art contribution will be spent.
- The blocks are provided with balconies between 5 and 10 sq m in size and private roof terraces. The latter are only accessible from the adjoining dwelling and are typically 20 sq m in size.
- The applicant has made the appearance of the development a reserved matter so that further and better details can be provided for approval prior to the start of construction.

- In addition to the open areas, a lake is proposed to the western side of the development with the main access bridged over it. As well as providing a major landscape feature, the lake will provide capacity to store rainwater runoff and with other attenuation measures ensure that the development does not contribute to any flooding down stream. It is located within the brook's floodplain.
- The whole development is to remain in private ownership and the roads and paths will not become public highways. A clause in the S 106 would ensure that whilst vehicles and parking will be controlled by the management company the public will have an unrestricted right to cross the site on foot and by bike.

Revisions to Previous Application:

- Following the earliest decision noted below (EAST/1062/99/OUT) the redevelopment of the site has been totally changed by the assembly of the site into two ownerships.
- As noted below under 'Relevant History', in July 2000 the Council granted an outline permission to the ASHA Foundation for cultural and community facilities on approx 2.8 ha of the site. At the same time permission was granted to Acton Housing Association (now Dominion) for 63 affordable homes on approx. 1.2 ha (based on the indicative layout)
- These permission were not implemented and this part of the application site then changed ownership twice passing into the hands of the Berkeley Group in 2004.
- Subsequently four planning applications were submitted for between 599 and 656 homes on the combined site of 4 Ha. These have never been determined.
- In the middle of 2005 the Berkeley Group acquired the northern 2 ha and then finally acquired 276/278 Whitchurch Lane in 2006.

d) Relevant History

EAST/426/94/OUT

Outline: Redevelopment for foodstore, two non-food units, garden centre, petrol station, teller machines, access, parking

APPEAL LODGED

AGAINST

NON-DETERMINATION

The Development Services Committee in November 1994 resolved that had the appeal not been lodged, the Council's decision would have been to refuse planning permission for the following reasons:-

1. The proposed development would result in the loss of land from existing or potential office, storage or industrial use and would thus be contrary to the policies and proposals of the Harrow Borough Local Plan and the Unitary Development Plan.

Items 1/03 & 1/04 : P/2317/06/CFU & P/2246/06/COU continued/...

2. The proposed development would be contrary to national (PPG6 and PPG13) and local planning policies relating to the location of new retail development.
3. The proposed siting of the superstore food building would be unacceptable in relation to the residential amenities of properties in Bramble Close.
4. The proposed siting of buildings and hardsurfaced areas would result in the unacceptable loss of trees of amenity value.
5. The application is inadequately documented in relation to the archaeological implications of the proposal in accordance with PPG16.
6. The Council is concerned about the effect of the proposal on the vitality and viability of surrounding town centres such as Stanmore, Queensbury and Harrow Town Centre and the applicants have failed to supply adequate information to assess the impact of the proposal on such centres in accordance with PPG6.
7. Part of the development is shown within the flood plain of the Edgware Brook, thereby increasing the risk of flooding due to impedance of flood flows and the reduction of flood storage capacity.
8. The proposed highway works would result in unacceptable pedestrian crossing facilities at the site access and Honeypot Lane/Whitchurch Lane junction and do not assist cyclists on the Strategic Cycle Network in Harrow, contrary to the United Development Plan.

APPEAL WITHDRAWN:
18-MAY-95

EAST/427/94/OUT

Outline: (Duplicate) –
Redevelopment for
foodstore, two non-food
units, garden centre, petrol
station, teller machines,
access, parking

WITHDRAWN
06-JUN-95

Application Site

P/2139/04/CFU

598 residential units (249
affordable), B1 offices,
retail, financial and
professional services, food
and drink, community
facilities, access & parking

CURRENT

Items 1/03 & 1/04 : P/2317/06/CFU & P/2246/06/COU continued/...

Eastern Part of Application Site (Dominion, former Acton Housing

EAST/1061/99/OUT	Outline: Redevelopment for affordable housing	GRANTED 29-JUN-00
P/373/03/CVA	Variation of Condition 1 of Planning Permission EAST/1061/99/OUT to allow submission of affordable housing reserved matters by 29 June 2005.	GRANTED 15-APR-03
P/190/05/CVA	Variation of Condition 1 of Planning Permission EAST/1061/99/OUT to allow submission of affordable housing reserved matters by 29 June 2007.	WITHDRAWN 13-APR-05
P/166/05/COU	Outline: Affordable housing, 49 houses and 50 flats in single, 2, 3, 4 and 5 storey blocks, parking	WITHDRAWN 18-MAY-05
P/1023/05/CRE	Renewal of Permission EAST/1061/99/OUT to allow submission of affordable housing reserved matters by 29 June 2007	GRANTED

Western Part of Application Site (former Asha Site)

EAST/1062/99/OUT	Outline: Redevelopment for D1, D2, A1, A3 and C1 uses - cultural and community facilities with retail, food and drink and short stay accommodation, access and parking	GRANTED 05-JUL-00
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Items 1/03 & 1/04 : P/2317/06/CFU & P/2246/06/COU continued/...

P/571/03/CVA	Variation of Condition 1 of Planning Permission EAST/1062/99/OUT to allow submission of details of reserved matters by 5 July 2006.	APPEAL AGAINST NON-DETERMINATION DISMISSED 06-OCT-03
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Existing Access between Application Site and Whitchurch Lane

P/2110/04/CFU	Reinstatement of existing pedestrian access route to Canons Park Station with associated landscaping	CURRENT
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P/2272/04/CFU	Duplicate of P/2110/04/CFU	CURRENT
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Common Land adjacent Edgware Brook between former Government Buildings Site and Whitchurch Lane

P/2109/04/CFU	Creation of new pedestrian access route with associated landscaping	CURRENT
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P/2271/04/CFU	Duplicate of P/2109/04/CFU	CURRENT
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Screening Opinion Environmental Impact Assessment not required		05-MAY-04
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UDP and Development Brief (approved 14 April 2005)

Extracts

UDP

- Part of the site is identified in the UDP (Proposal site 27) for 'comprehensive development for B1/B2/B8 use or business/residential.
- UDP notes the considerable potential to be developed for business, industrial or warehousing use, but also that 1.2ha has a residential permission and that an element of residential would be acceptable as part of a comprehensive scheme.
- Link to Canons park Station needs to be enhanced and nature conservation interests of Stanmore marsh and railway embankment protected

Purpose of Brief

- to establish parameters for the development of the site, and a policy framework in which the scale and form of development and the mix preferred land uses can be agreed.
- • to assist prospective developers in preparing proposals for the site, or for different parts of the site, within an integrated and comprehensive framework.
- • to promote a major development opportunity, capable of achieving a number Council objective and delivering a high quality and sustainable development of considerable local significance.
- as a strategic employment site any scheme should make a significant employment contribution to the Borough.
- to establish the potential for a range of local facilities to serve the new development and local area and contribute to sustainable community objectives.

Design and Layout

- site layout concentrating employment activities to the south and new housing to the north, with landscaped buffer between the 2 uses would be acceptable in principle.
- alternatively, mixed-use scheme over majority of site has potential to integrate housing and employment uses in more flexible layout. Uses should be compatible and laid out in a way that secures high quality residential and employment environments.
- site layout should create satisfactory long term relationship with Parr Road employment area so as not to prejudice the adjacent B1/B2/B8 activities.
- layout should encourage pedestrian movement.

Preferred Land Use

- Option 1: mainly B1/B2/B8 use. Any B1(a) proposal should demonstrate that the number of jobs exceeds that which ordinarily be expected to be provided from wholly B2 or B8 development.
- Option 2: mixed use scheme for B1 uses, residential and other supporting services and facilities. Must make substantial contribution to employment opportunities, addressing acute shortage of start-up B1(b) and B1(c) units (30m²-50m²) and move-on space (250m² - 1000m²).
- 50% of any additional residential development, above existing commitments, to be affordable. Developers seeking to pursue lower percentage will need to demonstrate impact on viability using appropriate toolkit methodologies.
- 10% of all new social rented dwellings to be built to wheelchair standards with remainder as 'Lifetime Homes'.

Items 1/03 & 1/04 : P/2317/06/CFU & P/2246/06/COU continued/...

- site provides opportunity to create developments of distinctive character and diversity of styles. Where possible traditional patterns of development should be created. Scope for range of design and architectural solutions. Development along northern and western boundaries should broadly respect predominant built form in surrounding area.
- development should take account of sustainable design and construction principles and maximise energy efficiency.
- crime prevention integral to design process.

Residential Mix and Density

- range of dwelling types required, balance between smaller and larger houses, and mix of houses and flats.
- lower density along northern boundary favoured.
- taller buildings and higher densities towards southern and eastern parts of the site.
- area around main entrance should have regard to local character but can act as a gateway into the site.
- development around railway embankment should maintain nature conservation value, with possible landscaped buffer.
- target mix:

1 bed	7%
2 bed	48%
3 bed	23%
4 bed	17%
5+ bed	5%
- sufficient usable amenity space required, with definition between private amenity space and public space.
- parking provision should take account of sites relatively good access to public transport, and encourage travel by non-car modes.

Access and Movement

- vehicular access from Honeypot Lane will need to be widened and redesigned with either revised priority junction or signals.
- final option will be determined on basis of T.I.A.
- proposals should incorporate series of pedestrian routes within site and to surrounding area.
- footpath link to Canons Park Station should be retained and enhanced.
- road layout should be cycle friendly.

Trees and Open Space

- high quality landscaping required, especially in business use areas.
- existing mature trees and landscaping should be retained wherever possible.
- if southern part is developed for B2/B8 uses a substantial landscaped buffer should be provided separating employment and housing uses.
- area of open space should be created over floodplain to Edgware Brook.

Phasing

- phased development encouraged provided proposals consistent with main principles of brief, and do not compromise development of remainder of site.

e) Applicant Statement

- The applicant's agent have submitted a very large amount of material to support this application. All of the material below is available on the Council's website and to Members in hardcopy in the Chief Planning Officer's office. Information within these documents has been used to inform the preparation of this report.

Schedule of accommodation
Schedule of drawings
Sets of A1 size drawings
Sets of A3 reduced drawings
Environmental Statement
Planning Statement
Design and Access statement
Landscape Statement
Employment statement
Affordable housing statement
Flood Risk Assessment
Flood Management Manual
Energy and Utilities statement
Noise statement
Transport Statement
Statement of community engagement
Operational statement
Sunlight and Daylight statement
Health Statement
Education statement
Draft S 106 agreement

f) Consultations:

- English Heritage; no response
- Environment Agency: Initial objections now withdrawn
- GLA (consultation mandatory since 500+ homes): Broadly acceptable in strategic planning terms, but raises a number of detailed issues to be resolved (copies of correspondence with the GLA attached as appendix A)
- TfL / LUL Concern for where brook passes under Jubilee Line.
- Countryside Agency; Did not wish to comment
- English Nature; No response
- Government Office for London; No response
- CABE; Has reviewed development three times. No substantial objection; would prefer through route for traffic.
- Harrow PCT; PCT seek a S106 contribution for the provision of an additional GP within an existing health centre.
- Housing Corporation; No response
- Stanmore Chamber of Commerce; No response
- Harrow Nature Conservation Forum; No response
- Middlesex Wildlife Trust: No response
- Three Valleys Water ; No response
- Thames Water : conditions requested re foul and storm water
- LB of Barnet; Holding reply, no response of substance
- LB of Brent; No objection

Advertisement:

- i. Departure from Development Plan
- ii. Major development

Expiry: 27-SEP-06

Notifications:

Sent:

1798

Replies:

394 on standard
postcards
91 letters

Expiry:

Not later than 5 October 2006
(sent over 10 day period)

Summary of Response:

existing traffic problems will be made worse; increased traffic flows; loss of privacy; density too high; building out of scale; services cannot cope; overdevelopment of site; risk of flooding

APPRAISAL

1) Quality of Design

The current scheme has been substantially redesigned to overcome concerns in respect of height of buildings, relationship to adjoining uses, access arrangements and in particular providing an access on to Whitchurch Lane, and provision of flood storage in the form of a lake on the western boundary. The difficult relationship with the Parr Road employment area has been resolved by locating the car park and Business Incubator/Move-on Centre along this boundary.

There is now a maximum building height of four storeys which provides a uniformity to the design of the residential blocks. There remain some concerns in respect of the detail design of the elevations and materials, which could be controlled by condition. The GLA have also raised issues about visual appearance (para 56) which they feel could be 'monotonous.' They have also raised concerns at the block which is located in the central courtyard and are seeking its removal.

The nearest existing residential properties are those in Whitchurch Lane which back onto the site. These would have a terrace of 3 storey houses with gardens backing onto them which will be approximately 12 metres from their rear boundary and 38 metres from the rear elevation. This is considered to be an acceptable relationship. The only other residential properties in proximity to the site are those in Bramble Close which are a minimum of 30 metres from the nearest proposed building.

The scheme has been considered by CABE. They have welcomed the changes made.

2) Housing Provision and Housing Need

Alterations to the London Plan, subject to Examination in Public September 2006, are now with the Mayor for adoption. This set a target for the Borough of 4000 additional homes for the period 2007/8 to 2016/17, an annual target of 400. Over the period 1997/2004 an average of 290 homes a year were completed, but this has increased to 488 in 2004/5 and 423 in 2005/6, in excess of the trajectory for provision. However, the LDF will need to demonstrate that the targets are attainable and deliverable over the plan period and this requirement is strongly reinforced in the recently published PPS3 'Housing'. The potential development of 816 units from this site would make a significant contribution towards the Borough targets. The Mayor's letter of 6th December asks for a further investigation of the housing mix to provide more larger units. The current mix has 82% of the units as studio, one or 2 bedroom units.

3) Re-use of Previously Developed Land

This is a brownfield site and its re-use complies with policy EP20 of the UDP.

4) Designated Employment Areas

The whole of the site is within an area designated for Industrial and Business Use in the UDP and there is therefore a presumption against its use for other purposes. The London Plan identifies the site as part of the Stanmore Industrial and Business Park which is a Strategic Employment Location. The site is also a proposal site (PS27) in the UDP which identifies it for comprehensive development for B1/B2/B8 employment uses or business/residential. There is an extant permission for the development of 1.2 hectares at the eastern end of the site for affordable housing.

It is for the applicants to demonstrate that there are sufficiently strong arguments to override the employment designations and policies. The applicants have commissioned consultants Colliers CRE to review the employment potential of the site and they have calculated that while there would be little demand for large space industrial or business use but there would be a real demand for business incubation. This would meet both Harrow and wider economic development objectives, providing easily accessible accommodation for new businesses which are a strong element in the vitality of the local economy, and in the emerging economic development strategy.

Officers are therefore satisfied that the previous history of the site and the proposal for the Business Incubation Centre are sufficient to overcome the employment designation. This view is supported by the GLA. The arrangements for the BIC would need to be safeguarded through a S106 agreement to ensure the accommodation is affordable and sufficiently flexible.

5) Sustainable Design and Construction

The proposed buildings are seeking to be if possible carbon neutral. The proposed parking and travel plan will minimise the traffic generated to the site. An on site Combined Heat and Power station plus on site thermal panels are proposed which the applicant states would provide energy efficiency in excess of the Mayor's policy 10% requirement. However the Mayor is concerned that there needs to be additional work in respect of the sustainable design and construction requirements and that the size of the proposed combined heat and power plant should be increased.

- **Site 27 of the UDP**

The UDP was adopted in 2004 and provides the foundation for the planning brief which was adopted as supplementary planning guidance in April 2005. The current application could be considered to comply with the 2005 brief in many respects viz

- The Business Incubation Centre and Move On space would make a significant employment contribution to the Borough.
- It concentrates employment activities to the south of the site and new housing to the north
- It integrates housing and employment uses
- The layout creates a satisfactory long-term relationship with Parr Road employment area.
- The layout encourages pedestrian movement
- The scheme is broadly in line with option 2 of the brief in its content as a mixed-use scheme which addresses the shortage of start-up and move on space.
- It contains a range of design and architectural solutions
- Development along the northern boundary respects the built form in Whitchurch lane.
- It takes account of sustainable design and construction and energy efficiency.
- It provides pedestrian routes within the site and to the surrounding area (to Whitchurch lane and Canons Park Station).
- Area of open space should be created over the floodplain to Edgware Brook.

However there are aspects of the development which are inconsistent with the brief which the Committee will need to consider, in particular the residential mix and density and the affordable housing provision which are examined in the following paragraphs.

7) Residential Density

Assessing an appropriate density of development for this site needs to take account of policy and guidance at local, London wide and national level and give proper consideration of the particular nature, location and characteristics of the site.

UDP Policy H4 states that *'the Council will expect that residential densities in new development should not be less than 150 habitable rooms per hectare.'* There is no maximum level and the reasoned justification acknowledges that maximum housing provision will be sought on each site consistent with design and amenity considerations and other policies in the plan. The policy continues *'with the emphasis in the Plan being placed on a design-led approach to development, it is considered that it is inappropriate to include a maximum density figure.'*

Meeting the Council's policy requirements in this respect is therefore dependent on the development's impact; physical, environmental and on the local infrastructure. Consideration of the impact of the design and appearance should ensure that *it 'does not detract from the established character.'*

The London Plan policies are more complex and need to be assessed against the 'Density location and parking matrix' (Table 4B.1 p 177). Policy 4B.3 on the London Plan states that Borough's should ensure that development proposals achieve the highest possible intensity of use compatible with local context, the design principles set out in 4B.1 and with public transport capacity. Boroughs should develop residential and commercial density policies in their UDPs in line with this policy and adopt the residential density ranges set out in Table 4B.1.

The density matrix (copy attached in Appendix A) set out appropriate density ranges according to location, public transport accessibility and setting. Settings can be defined as

'Central', applying to larger town centres and much of Central London,

'urban' - dense development, with a mix of different uses and buildings of three to four storeys, such as town centres, along arterial routes and substantial part of inner London, and

'suburban' – lower density development, predominantly residential, of two and three storeys, as in some parts of inner London and much of outer London.

This site has a public transport accessibility rating of 3 within the location criteria as 'sites along transport corridors and sites close to town centres.' The question then arises of whether the site is 'urban', in which case a density range of 300-450 habitable rooms per hectare and 100-150 units per hectare is appropriate for mostly flatted schemes, or 'suburban'. This is more problematic as the matrix does not provide for mainly flatted developments in suburban locations. If 'urban' is considered appropriate the density proposed is within the range at 385 hrpha and 130 dpha. If this is considered to be a 'suburban' location the development proposal is outside of the matrix ranges.

PPS3 establishes 30 dwellings per hectare as a national indicative minimum guide for policy development and decision-making. It goes on to state that

'more intense development is not always appropriate. However, when well designed and build in the right location, it can enhance the character and quality of an area. Successful intensification need not mean high-rise development or low quality accommodation with inappropriate space..... Density is a measure of the number of dwellings which can be accommodated on a site or in an area. The density of existing development should not dictate that of new housing by stifling change or requiring replication of existing style or form.

If done well, imaginative design and layout of new development can lead to a more efficient use of land without compromising the quality of the local environment.'

PPS3 therefore makes allowance for increasing densities where development is of a high quality and enhances rather than detracts from the local environment.

To come to a conclusion as to an appropriate density on this particular site the Council's UDP policy, the London Plan matrix and the guidance in PPS3 must all be considered. The Council's policy relies on a minimum density and a design-led approach.

In this particular location, which is well shielded from public view by the railway embankment, the industrial units in Parr Road, the tree and vegetative screen in Honeyput Lane and the houses in Whitchurch Lane, it can be argued that there would be little impact on the character of the area. The houses in Whitchurch Lane have gardens backing on to them, and views into the site otherwise are limited to passengers on the Jubilee Line and glimpses from the access onto Whitchurch Lane. The alternative viewpoint is that the site should be seen in a wider context of the suburban setting and that the density range should be within the 'suburban' setting of the GLA matrix.

The GLA report (para 47) accepts that the development is outside of the London Plan guidelines for a 'suburban' setting along a transport corridor, but considers that the density is justified by the design of the development.

8) **Affordable Housing**

The Affordable Housing provision as proposed is:

2 x 5 bed homes	Social Rent
41 x 4 bed homes	Social Rent
13 x 3 bed homes	Social Rent
20 x 3 bed flats	6 Social Rent
	14 Low Cost Home Ownership
106 x 2 bed flats	11 Social Rent
	64 Shared Ownership
	31 Low Cost Home Ownership
77 x 1 bed flats	4 Social Rent
	59 Shared Ownership
	14 Low Cost Home Ownership
<u>Total</u> 259 Units	77 Social Rent
	123 Shared Ownership
	59 Low Cost Home Ownership

Items 1/03 & 1/04 : P/2317/06/CFU & P/2246/06/COU continued/...

This totals 259 units (32%) and 1411 habitable rooms (40%). In overall percentage terms this would meet the Council's UDP policy H5 which seeks a minimum of 30%, accepting that the low cost home ownership provision accords with the Council's affordable housing definitions.

This would be the first time that low cost home ownership has been provided in the Borough. In effect the properties would be sold at a 20% discount on the open market valuation, and this 20% share would be vested in the Council to ensure that the units cannot be sold on at the full market rate. The purchase price could be as follows:

Size	Market Value	Purchase Price (80%)	Household Income Required
1 bed flat	£180,000	£144,000	£41,143
2 bed flat	£255,000	£204,000	£58,286
3 bed flat	£295,000	£236,000	£67,429

The costs exclude service charges. In terms of the Council's normal affordability criteria, only the one bedroom flats would be considered 'affordable.' Members will need to consider whether the 31 two bed and 14 three bed units should be included in the affordable housing provision. Excluding them would bring the unit percentage down to 26.5% and the habitable room figure to 32%. This would still be above the minimum target figure of 30% in policy H5.

As proposed the affordable housing would meet the H5 policy minimum. However, members will need to take into account (i) the previous history of the site, and (ii) the tenure proposals.

1.2 hectares of the site was in the ownership of Dominion (formerly Acton) Housing Association and had planning permission for 63 affordable homes. This site had been identified as providing the 'off-site' provision of affordable housing in respect of development at Brockley Hill, Stanmore, another former government office site.

UDP policy H5 seeks a normal requirement for a split of 70% : 30% social rented to intermediate housing which also reflects the guidance in the London Plan. The scheme provides 30% : 70% in terms of units, 48% : 52% in terms of habitable rooms. The Mayor in his letter of 6th December asks the applicant to either justify the deviation or amend the mix. The Mayor is also concerned that the proportions do not accord with the Housing Corporation proposed allocations for the site, which support higher levels of rented units.

The applicants have advised the GLA that the level of affordable housing has been driven by the necessity to provide flood attenuation measures, renewable energy infrastructure and the Business Incubator Centre. The Mayor has accepted that this has been demonstrated through a financial appraisal. However a full version of the appraisal has not been made available to Harrow officers.

9) Standard of Design & Layout

The overall quality of design is dealt with in 1 above. The Design and Access Statement provides a clear explanation of the applicant's vision for the site and how this has been translated into design principles and the creation of character areas within the site.

Providing access onto Whitchurch Lane provides permeability through the site for pedestrians, both residents and non-residents. This is a benefit to the scheme. The 'grid pattern' of development also allows permeability and legibility to the proposal.

The overall approach to design and materials is contemporary. The site is large and is well shielded from the surrounding area and there is therefore an argument that it can take on a character of its own. The contrary argument is that this part of the Borough has an established character which should be appreciated in the visual approach to development. Whichever approach is accepted, there are detailed issues about the appearance of the residential elements of the scheme as highlighted in the letter and report from the GLA, of 6th December, which, refers specifically to the 'somewhat monotonous' appearance which could be improved by providing 'larger windows, a greater variety of windows or the introduction of more balconies.'

The GLA also registered concern at the irregularly shaped block in the middle courtyard of the central zone. This should be omitted in the view of the Mayor to improve the layout and provide a better courtyard space.

The Mayor has also indicated his concern at the size of the dwelling layouts, the fact that they are all single aspect which impacts in many instances on their internal layout and practicability, and in some instances results in single aspect flats facing onto the railway.

While some of these issues can be addressed by condition, more fundamental concerns such as the internal arrangements, outlook and the block within the courtyard could only be dealt with through amendments to the scheme.

10) Amenity and Playspace

There would be a range of private and public amenity space throughout the development in the form of communal gardens, private gardens (for the houses), balconies and roof terraces. Approximately 1.25 acres of public space would be created, excluding the lake.

The estimated child population is 381, of whom 293 would be generated by the affordable housing. These would be split 0-4 years: 150, 5-11 years: 140 and 12-16 years: 91.

The Mayor has published draft Supplementary Planning Guidance setting standards for play space with a benchmark figure of 10 sq m per child. This guidance is currently only draft and has not been considered or adopted by the Council. The overall space requirement this would produce of 3810 sq m is considered unrealistic and impractical. The current proposal provides 100 sq m of dedicated play space for children up to 6 years of age, and there are other informal areas within the layout as well as gardens for the affordable houses. However, the Mayor is suggesting that there should be a dedicated play area in the order of 800 sq m for up to 11 year olds and on on-site youth space.

On-site provision for older children has been considered in negotiations with the applicants and advice has been taken from the Metropolitan Police Design Advisor as well as officers from Housing and People First. The considered view is that provision for older children would best be located off-site and a contribution of £75,000 towards such a facility within Canons Park has been agreed by the applicant.

11) Flood and Drainage Issues

A part of the site is within the floodplain of the Edgware Brook. The layout provides for open space and a flood balancing lake with a re-shaped floodplain, designed to accommodate a 1 in 100 year flood. This, with the levels for the development will provide the necessary capacity for a 20% tolerance in excess of the 1 in 100 year event, taking account of a possible blockage in either of the new culverts. This solution is considered to be acceptable. The flood risk assessment on which the proposals are based has been examined by both the Environment Agency and the Council's drainage engineers.

12) Biodiversity

There are no protected areas within the site and on evidence of any ecological or biodiversity interests worthy of conservation or enhancement. The two adjacent non-statutory sites of nature conservation interest (Stanmore Marsh and the Jubilee Line embankment) would not be adversely affected by the proposed development.

13) Impact on local infrastructure

The applicants have provided studies which assess the impact of the proposals on local services including education and health provision. There is currently a surplus of school places in the east of the Borough and the Council's People First officers agree with the assessment that the numbers of children generated from this proposal would not justify additional school provision. Accommodation would be provided on site for nursery provision and for community rooms.

The Primary Care Trust have indicated that they consider that the number of residents would lead to increased demand for GP provision and have requested a sum of £50k which would enable existing local facilities to be extended to accommodate an additional doctor.

14) Transport impact and Parking

The site is relatively well located for public transport and has a public transport accessibility index (PTAL) rating of 3. The proposals include a much improved pedestrian access to the site from Canons Park Station (Jubilee Line). Bus services in Whitchurch lane and Honeypot Lane connect the site to Edgware, Harrow and Brent Cross. There is sufficient capacity on these services to meet the likely demand generated by the development. Should the application be approved transport for London would be seeking a S106 contribution to public transport infrastructure of at least £100k to fund improvements to bus stops, to assess further works at Canons Park Station and to ensure signalised junctions are disability compliant.

The proposal provides 0.88 parking spaces per residential unit which is considered adequate in view of the local public transport capacity, the parking management proposals for the development and the provision of a car club and green travel plan. Parking within the site would be strictly controlled by on site management, and parking availability outside of the site is severely constrained by existing parking restrictions. Should the need be identified in the future a requirement to fund further parking restrictions would be included within any S106 agreement.

Concerning traffic issues, there are two issues to highlight. First that a traffic light controlled junction is to be formed on Honeypot Lane. This will give vehicular access to all development except the 56 houses at the rear of Whitchurch Lane and the flatted accommodation opposite. These will be accessed by a new road which will join Whitchurch Lane where Nos.276-278 currently stand.

Second, traffic generation. The impact analysis demonstrates that the volume of traffic and the peak hour movements on Honeypot Lane would be less than would be generated by using the site entirely for employment uses. This road is controlled by TfL, being a London Distributor Road, who are satisfied with the proposed junction.

Given the public transport accessibility and the restraint based parking provision, it is considered that the transport assessment demonstrates that the traffic generated by the proposed development could be accommodated satisfactorily, with the improved junction arrangements onto Honeypot Lane.

15) The Footpath Application (P/2246/06/COU/RP1)

As the description of the development indicates, the footpath and landscaping alongside the brook are part and parcel of a comprehensive development package. By itself, the application is unacceptable since it would be a footpath to nowhere increasing the risk of crime and disorder.

16) Section 106 Issues

Officers have been discussing the potential contents of a S106 agreement with the applicants in anticipation of a satisfactory planning permission. The following issues have been identified, and although not agreed in detail, could form the basis for agreement.

- Affordable housing provision as set out in para 8 of the appraisal including low cost market housing arrangements
- Provision, retention and phasing of Business Incubator and Move On Space, and management arrangements incl accommodation for Harrow in Business
- Highway works
- Green travel plan
- Car Club provision
- Funding for CPZ if required
- Management of on site parking
- Public access to roads and footpath
- Provision and use of community facilities
- Contribution of £250k to local employment and training initiatives
- On-site children's play facilities
- Contribution to off site play facilities (£75k)
- Contribution to public art (£50k)
- Agreement to provide and maintain flood management arrangements
- Contribution of £100k to public transport
- Contribution of £50k to cost of administering the agreement

17) Consultation Responses

Concerns of the Statutory consultees have been dealt with in the report.

The Mayor's response has been attached in full at Appendix A. Members will note that the Mayor's letter of 6th December accepts that the application is '*broadly acceptable in strategic planning terms*'. However he does set out a number of matters which he feels need to be addressed. These have been included in the body of this report. Some of these could be dealt with through condition or provisions of a S106 agreement, but others would need amendments to the application. Members will note that in the letter from the GLA of the 13th December, Giles Dolphin (Head of Planning Decisions) is confident that negotiations would have been successful and that '*had Harrow Council decided to grant permission the Mayor would not have directed refusal*'. He goes on to say that he would expect negotiations to resolve any issues '*before the public inquiry commences*'

Items 1/03 & 1/04 : P/2317/06/CFU & P/2246/06/COU continued/...

Comments in respect of the response to neighbour notifications are also contained within the report under the relevant headings, in particular 'residential density', 'standard of design and layout' and 'transport impact and parking'.

CONCLUSION

This application is one of the most significant proposals which the Committee will need to address. The applicant has chosen to submit duplicate applications and to appeal against the duplicate while leaving the other application to run. In this instance the Committee must consider how it would have dealt with the application in its current form including what could be satisfactorily controlled through condition or the provisions of a S106 agreement. As previously stated, if the Committee comes to the conclusion that the application would be acceptable in these circumstances, appropriate conditions and S106 provisions will be drafted for the next meeting and can be considered simultaneously with the extant application.

Alternatively, should the Committee come to the conclusion that even with conditions and S106 requirements the application would not be acceptable, it should set out clearly what reasons it would want to put forward for refusal, taking into account the relevant provisions of the development plan, other material considerations and the response to notifications.

Mr G Jones

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Your ref: P/2315/06/CFU;
P2317/06/CFU; P/2245/
06/COU & P/2317/06/COU
Date: 6 December 2006

Dear Mr. Jones,

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999; Town & Country Planning (Mayor of London) Order 2000 former government offices site, Honeypot Lane, Stanmore

I refer to your letter of 22 August 2006, consulting the Mayor of London on the above planning application. On 29 November 2006, the Mayor considered a report on this proposal, reference PDU/0827a/01. A copy of the report is attached, in full.

Having considered the report, the Mayor has concluded that the proposal is broadly acceptable in strategic planning terms. Overall and on balance, the development provides a satisfactory response to the site's designation as a strategic employment location and there are sufficient circumstances to justify a departure from policy.

However, the following matters need to be addressed:

- The Section 106 agreement needs to safeguard the business incubator centre and ensure that it is built prior to occupation of an agreed number of residential units. Additionally, it should include clauses relating to marketing; monitoring; a 10% (below market) rent reduction and the flexibility to increase the business incubator centre floorspace.
- The proposal does not meet the London Plan objective of affordable housing being provided as 70% social rented housing and 30% intermediate provision. It is provided as 30% social rented and 70% intermediate provision (or 48%/52% by habitable rooms). The applicants should provide a justification for the deviation from the London Plan target and possibly, amend the accommodation mix. The proposed proportion of housing also appears to be contrary to the Housing Corporation programme allocations for this site which would have supported a much higher level of social rented provision.

- Further investigation of the housing mix so that more larger units are provided.
- The proportion of the private units that are designed to be wheelchair accessible, should be increased to 10%.
- The play space needs to be increased across all the age ranges. In particular, a formal teenage 'hangout' facility should be provided on site.
- Variations to the design (paragraphs 56-60 of the attached report provides more detail on this matter).
- A minimum contribution of £100,000 towards public transport infrastructure.
- Additional work in relation to sustainable design and construction. In particular, the size of the combined heat and power plant should be increased.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999. The Mayor has taken the environmental information made available to date into consideration in formulating his comments.

If Harrow Council decides in due course that it is minded to approve the application, it should allow the Mayor fourteen days to decide whether or not to direct the Council to refuse planning permission (under article 4(1)(b)(i) of the Town & Country Planning (Mayor of London) Order 2000). You should therefore send me a copy of any officer's report on this case to your planning committee (or its equivalent), together with a statement of the permission your authority proposes to grant and of any conditions the authority proposes to impose, and a copy of any representations made in respect of the application (article 4(1)(a) of the Order).

Yours sincerely,



Giles Dolphin
Head of Planning Decisions

cc Robert Blackman, London Assembly Constituency Member
Tony Arbour, Chair of London Assembly Planning and Spatial Development Committee
Ian McNally & John Pierce, GoL
Sam Richards, TfL
Lucinda Carter & Rodney Keg, LDA
Ms S. Bevan, Turley Associates, 25 Savile Row, London, W1S 2ES

**former government offices site,
Honeypot Lane, Stanmore**

in the London Borough of Harrow

**planning application nos. P/2315/06/CFU; P2317/06/CFU;
P/2245/06/COU; & P/2317/06/COU**

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999; Town & Country Planning (Mayor of London) Order 2000

The proposal

Redevelopment to provide 816 residential units; a 'business incubator centre'; floorspace for retail/restaurant and community facilities; associated flood alleviation, landscaping and highways works.

The applicants

The applicants are **Berkeley Urban Renaissance Ltd.** and **Dominion Housing Group Ltd.**, and the architect is **Hamiltons**.

Strategic issues

In **employment/economic function** terms, the site is identified in the London Plan as a Strategic Employment Location (SEL). Whilst SELs would normally be protected, there are sufficient circumstances to justify a departure from policy. These include the site constraints to major industrial use; the provision of marketing information that demonstrate that the site is generally regarded as being not particularly well established or recognised for industrial/warehouse occupiers; and the provision of the business incubator centre which will provide significant employment.

Additionally, the amount of **housing** will contribute to London Plan objectives for housing delivery. Affordable housing at 40% (by habitable rooms) has been justified by a Three Dragons appraisal. The tenure is skewed towards intermediate accommodation which needs to be altered or further justified. The density is acceptable. The mix of units, which includes larger units is welcomed.

The **design** of the proposal is broadly acceptable. An **access** statement has been produced. The scheme will produce 100% Lifetime Homes but the amount of wheelchair accessible housing within the private units needs to be increased to 10%.

The proposal is acceptable in **transport** terms subject to a contribution towards public transport infrastructure.

In relation to **sustainability**, an on-site combined heat and power plant is proposed together

with solar thermal panels. CO2 emissions will be reduced by 16%.

Biodiversity implications are acceptable.

Recommendation

That Harrow Council be advised that the proposal is broadly acceptable in strategic planning terms subject to the resolution of various detailed matters.

Context

1 On 22 August 2006, Harrow Council consulted the Mayor of London on a proposal to develop the above site for the above uses. Under the provisions of the Town & Country Planning (Mayor of London) Order 2000 the Mayor has the same opportunity as other statutory consultees to comment on the proposal. This report sets out information for the Mayor's use in deciding what comments to make.

2 The application is referable under the following Categories of the Schedule of the Order 2000: 1A "Development which ... comprises or includes the provision of more than 500 houses and flats" and 3E "Development which does not accord with one or more provisions of the development plan and ... comprises or includes the provision of more than 150 houses or flats or houses and flats."

3 If Harrow Council subsequently decides that it is minded to grant planning permission, it must first allow the Mayor an opportunity to decide whether to direct the Council to refuse permission.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

5 The Mayor of London's comments on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The site is located close to Canons Park Underground Station (Jubilee Line). The 6.2 hectare site has two main constituent parts:

- Land formerly occupied by the Ministry of Defence as offices. The buildings which previously existed on the land have now been cleared and the site is vacant.
- Vacant low rise 1950's office buildings which were occupied by the Driver and Vehicle Licensing Agency until earlier this year.

7 Canons Park is typically suburban in character. The area is characterised by inter war 2-storey houses and local shopping and services are provided on a parade adjacent to the Underground Station and on Honeypot Lane.

8 The site is surrounded by the dual-carriaged Honeypot Lane (A4140); the Jubilee Line; housing and low-rise industrial buildings. The Edgware Brook runs to the north-west of the site.

Details of the proposal

9 Planning permission is sought for the following development:

- 816 residential units to be provided as 760 flats and 56 houses. Of these, there would be 555 private units and 261 affordable units.
- A 'business incubator centre' (BIC) (7,927 sq.m.) providing Class B1 (business) space for new businesses and accommodation for move-on space, over three buildings. The agent has advised that: *"BIC's provide a dynamic environment in which young start-up businesses can grow and develop during the time they are most vulnerable. They offer fully serviced accommodation which include a small serviced incubator space, reception areas, meeting rooms, post room and refreshment facilities and networked telephony and high speed broadband internet access for tenants."*
- Floorspace (959 sq.m.) for Class A1 –A5 uses (such as retail and restaurants) and community facilities (such as a creche; meeting room or gym). The applicants have advised that the meeting room will be provided as part of the Section 106 agreement but the nursery and gym would need to be market tested and commercially assessed.

10 The residential accommodation would be provided in the following mix:

	market		affordable		Total	
	number	%	number	%	number	%
studios	31	6	0	0	31	4
1-bed flats	274	49	73	28	347	42
2-bed flats	178	32	112	43	290	35
3-bed flats	72	13	20	7	92	11
3-bed houses	0	0	13	5	13	2
4-bed houses	0	0	41	16	41	5
5-bed houses	0	0	2	7	2	7
total	555	100	261	100	816	100

11 Affordable accommodation would be provided at 32% (or 40% by habitable rooms). The affordable accommodation would be provided as 77 social rented units (30%) and 182 shared ownership/low cost home ownership units (70%)

12 The master-plan of the development proposes that the commercial uses are located to the south of the site forming a frontage to a 4-level car park. Retail and community uses are located at ground floor level below residential accommodation to the east of the site. This is intended as the heart of the development and will also feature a village green.

13 The social rented houses and flats would be located on the northern part of the site with shared ownership and low cost housing nearby. The private residential accommodation would be spread across the rest of the site.

14 Seven urban blocks (Crescent; Central; Southern; Waterside; Northern (houses) and Northern (flats) and Whitchurch Lane) will be created, each being treated as separate character areas. Building forms, architecture and landscape will be used to make each of these different. However, in order to ensure that each area belongs to the whole development, certain aspects of the buildings are common across the site, such as window proportions, balcony features and materials.

15 The proposed buildings are all four storeys other than the northern boundary buildings which would be three storeys. A variation in height across the site is achieved by setting back the basic four storey forms to create roof terraces and by the manipulation of the roof line using parapet walls. This design strategy, coupled with the changes of level across the site and sloping roofs, where appropriate, is intended to create a varied townscape.

16 The site would be accessed from both Honeypot Lane and Whitchurch Lane. The access to Whitchurch Lane has been enabled by the purchase of two houses. A road would be provided linking the two access points.

17 An integral children's play space will be provided close to the family housing. Various other green spaces will be provided throughout the development.

18 A related planning application seeks landscape improvements to Edgware Brook and the Honeypot Lane frontage, including a new pedestrian link to Whitchurch Lane. This will enable easier connection to a local school and other facilities.

19 A comprehensive flood attenuation strategy is proposed as the Edgware Brook, which runs to the west of the site, is at risk of flooding. Flood attenuation measures include the incorporation of flood water storage basins within a landscaped area close to Honeypot Lane. The flood basins will contain permanent water to create an ecological zone on the site.

Case history

20 Outline planning permission was granted in May 2000 to the ASHA Foundation for the development of cultural and community facilities on part of the site. Simultaneously, planning permission was granted to Acton Housing Association for 63 affordable dwellings on another part of the site. The residential permission was renewed in 2005.

21 Berkeley Homes submitted planning applications in 2004 for two proposals relating to the Ministry of Defence land. At that time, Berkeley Homes did not own the DVLA land. The proposals were for two predominately residential led schemes – one for 639 units and the other for 598.

22 The applications were seen by the Mayor in July 2005. The Mayor concluded that the predominately residential proposals conflict with the site's designation within the London Plan as a Strategic Employment Location. The applicants therefore had to demonstrate that by using the site for predominately residential purposes, the objective of the London Plan to retain a strategic reservoir of capacity for industrial and other economic functions (e.g. logistics and distribution) would not be compromised. Additionally, various other matters needed to be addressed including the amount and type of affordable housing; the mix of units; design alterations; and the need to master-plan the Ministry of Defence land and the DVLA land together.

23 These applications have been subsequently withdrawn.

Strategic planning issues and relevant policies and guidance

24 The relevant issues and corresponding policies are as follows:

- Employment/
economic function *London Plan; PPG4, draft Industrial Capacity SPG*
- Housing *London Plan; PPG3; draft PPS3; Housing SPG; 'Providing for Children and Young People's Play and Informal Recreation' draft SPG*

- Urban design *London Plan; PPS1*
- Transport *London Plan; the Mayor's Transport Strategy; PPG13*
- Biodiversity *London Plan; the Biodiversity Strategy; PPS9*
- Access/equal opportunities *London Plan; PPS1; SPG "Accessible London: achieving an inclusive environment"; ODPM Planning and Access SPG*
- Sustainable development *London Plan; PPS1, PPG3; PPG13; PPS22; the Mayor's Energy Strategy; Sustainable Design and Construction SPG*

25 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2004 Harrow Unitary Development Plan and the 2004 London Plan.

26 The following are also relevant material considerations:

- The Early Alterations to the London Plan, to which greater weight should be applied as they have been subject to an Examination in Public and the Panel Report has been published.
- The Further Alterations to the London Plan, which are currently undergoing public consultation.
- Harrow's Core Strategy and Site Specific Proposals have been published at the 'Issues and Options' stage.
- Harrow's Development Brief for land at Honey Pot Lane (April 2005).

Employment/economic function

27 At a local level, the Harrow UDP identifies part of the site as Proposal Site PS27 for *"comprehensive development for B1/B2/B8 use or business/residential"*. The site, together with land to the north and south, forms part of the Stanmore Industrial Business Park. The UDP states that *"it is the largest vacant industrial site in the Borough and has considerable potential to be developed for business, industrial or warehousing use"*.

28 The UDP also states that: *"An element of residential use, including work/live units, would therefore be acceptable, as part of the comprehensive development of the whole site, principally for employment use."*

29 Additionally, a development brief for the application site and the DVLA land was adopted as supplementary planning guidance by Harrow Council in April 2005. The brief sets out that proposals for the development of the site should address employment issues. Minimum requirements are to ensure that current levels of employment on the occupied part of the site (as at 2005) are maintained and to address potential levels of employment and training places from the vacant area. It is set out that this could be achieved either as part of a development mainly for B1/B2/B8 uses or within a mixed use scheme for B1 uses, residential and other supporting services and facilities.

30 Within the London Plan, the site is identified as being part of the Stanmore Industrial Business Park which is defined as a *'Strategic Employment Location'* (SEL). Policy 3B.5 states that: *"With strategic partners, the Mayor will promote and manage the varied industrial offer of the Strategic Employment Locations...as London's strategic reservoir of industrial capacity"*.

31 As stated at paragraph 23, in relation to the previous application, the Mayor concluded that the predominately residential proposals conflicted with the site's designation within the London Plan as a Strategic Employment Location.

32 The limited supply of industrial land in Harrow relative to demand places weight on the particular importance of the site as the largest with employment potential in the borough. A significant proportion of the sub-regional benchmark for release has already gone.

33 The applicants therefore had to demonstrate that the objective of the London Plan to retain a strategic reservoir of capacity for industrial and other economic functions, by a predominately residential proposal, would not be compromised.

34 Accordingly, the applicants commissioned Colliers CRE to review the employment potential of the site. The study concluded that an incubator centre for small businesses as well as office buildings 'would be the most appropriate response to planning policy and the pent up requirement of small businesses in the London Borough of Harrow.'

35 The current application therefore proposes a business incubator centre, which will provide Class B1 (a) (b) and (c) space for new businesses and accommodation for move-on space. The estimated job yield is 295. It will be facilitated by a cross-subsidy from the remainder of the proposed development. A further 45 jobs are likely to be created on the development site from retail, estate management and community support facilities.

36 It is recognised that the proposed use will be employment generating and would meet a need for such accommodation. It would also comply with the Mayor's draft Supplementary Planning Guidance on Industrial Capacity which advises that Industrial Business Parks are for firms which need better quality surroundings. These are usually B1 (b) and (c) and high value added B2 activities.

37 The applicants have also advised that significant industrial development cannot be accommodated given the residential use already permitted on part of the site; the residential uses surrounding the site; access; flood attenuation and ecological safeguarding. Additionally, Berkeley has advised that by assembling the land from three different parties, more space has been made available for employment land than if the site had been developed in three parts.

38 Marketing information has also been provided by the applicants from Lambert Smith Hampton. It states that when the site was marketed, little interest was received from the commercial development market as the perceived planning status indicated the potential of a residential scheme in which the industrial developers could not compete.

39 Additionally, Lambert Smith Hampton has advised that: *"The area is generally regarded as being not particularly well established or recognised for industrial/ warehouse occupiers or developers due to the overall residential feel to the location together with lack of suitable local network and accessibility to motorways. The market is not recognised as being institutionally acceptable and is regarded more of a localised market."*

40 The space within the bic is intended to be flexible so that it can respond to the needs of start-up and move-on businesses. Berkeley has advised that if required, an additional floor could be added to the bic. This is welcomed as there is evidence of an acute shortage of start-up B1b and B1c units of sufficient quality in the borough of Harrow as indicated by both a 2002 Chesterton report and the employment report that accompanies the application.

41 Overall, whilst the need to maintain a strategic reservoir of capacity for industrial and other economic functions has not been fulfilled and it is disappointing that the ratio of

employment/residential floorspace is not more heavily weighted towards employment, there are sufficient circumstances to justify a departure from policy.

42 The bic needs to be safeguarded within the Section 106 agreement and built prior to occupation of an agreed number of residential units. Additionally, measures proposed by the applicant to promote the bic such as marketing, a 10% (below market) rent reduction and the flexibility to increase the bic floorspace should also form part of the Section 106 agreement.

Housing

43 The number of residential units will help the Mayor's target for additional housing in London (London Plan policy 3A.1 – *'Increasing London's supply of housing'*).

44 The proposals will provide approximately 32% affordable housing by units or 40% by habitable rooms which is below the London Plan target of 50%.

45 The applicants have justified the affordable housing provision with a 3 Dragons financial appraisal. The applicants have also advised that the delivery of the flood attenuation; renewable energy infrastructure and the business incubator centre have driven the level of affordable housing. This is accepted.

46 The proposal does not meet the London Plan objective of affordable housing being provided as 70% social rented housing and 30% intermediate provision. It is provided as 30% social rented and 70% intermediate provision (or 48%/52% by habitable rooms). The applicants should provide a justification for the deviation from the London Plan target and possibly, amend the accommodation mix. The proposed proportion of housing also appears to be contrary to the Housing Corporation programme allocations for this site which would have supported a much higher level of social rented provision.

47 The density of the development is 379 habitable rooms per hectare. This exceeds the guidelines set out in the London Plan for a location such as this, i.e., a 'suburban' setting along a transport corridor, with a public transport accessibility level of 3, for which a density range of 200 – 250 habitable rooms per hectare is set out. However, the density is justified by the design of the development which proposes a layout suited to the site; the areas of public space; and many flats enjoying private amenity space. It is also noted that this proposal provides a good pedestrian link to the Underground Station.

48 Within the social rented housing, the mix which includes a good proportion of larger units (21% of units are 3-bedroom or more and 56% are 4-bedrooms or more) is appropriate and welcomed.

49 Within the intermediate housing, a greater proportion of 4-bedroom or larger units would be welcomed – at present, none are proposed in contrast to supplementary planning guidance which sets out a London-wide requirement of 34%.

50 The estimated child population of the private housing is estimated at 88. For the affordable accommodation, it is estimated at 293. This gives an overall total of 381. This breaks down as follows overall:

- 0-4 years: 150
- 5-11 years: 140
- 12-16 years: 91

51 Using the benchmark standard of a minimum of 10 sq.m. per child, this equates to a play space requirement of 3,810 sq.m.

52 The current proposal shows a play space of 100 sq.m., which is designed for children up to six years. The applicants have advised that there are other areas within the development that can provide opportunities for informal play, including the greens; the area around the lake; and the northern and central courtyards. However, in relation to the courtyards, some of them are likely to be too small to provide any practical communal amenity space.

53 Whilst it is recognised that there are open spaces in the vicinity, the play space required is substantially below the standards set out in the Mayor's *'Providing for Children and Young People's Play and Informal Recreation'* draft supplementary planning guidance, e.g. an 800 sq.m. local or playable neighbourhood space for the under 5's/5-11s; and an on site youth space.

54 The applicants have responded by advising that the play provision strategy for young children is supported by Harrow Council. In relation to provision for older children and teenagers, during pre-application discussions with the Harrow Crime Reduction Unit, a formal 'teenage hangout' facility to be provided on site to encourage teenagers to congregate in an open, overlooked area that is away from formal toddler play space was requested. Berkeley therefore offered to provide a suitable shelter within the open space enclosed by the crescent block in the eastern sector.

55 However, during application negotiations, Harrow Council objected to such a facility being provided on site for amenity reasons. Dominion Housing Association was also concerned about amenity issues. Harrow Council would prefer to encourage older children to use Canons Park to avoid the potential for disturbance to residents on site. Harrow Council has a substantial programme of maintenance and upgrade works in place for Canons Park and has obtained Lottery funding to facilitate this. Berkeley has agreed a contribution of £75,000 towards these works.

Urban design

56 The visual appearance of the new buildings is reasonable but could be improved. The different blocks benefit from careful detailed massing, including subtle changes in height and building line, but the proposed repetition of windows and material could still render the development somewhat monotonous. This could be avoided by providing larger windows; a greater variety of windows; or the introduction of more balconies.

57 The introduction of a breakthrough from the site to Whitchurch Lane provides a greatly improved access to and from the site with the Underground station as compared with the previous proposal. The permeability through the site is good.

58 The size of the courtyard in the central zone is of a good size but its dimensions are cut short by an irregularly shaped block in the middle. There are no clear urban design reasons for this block protruding into the courtyard and it should be omitted. In addition the ground floor units are accessed internally and as a result the courtyard space is likely to end up as an inactive communal space with limited benefit for the residents.

59 The dwelling lay-outs appear generally small. All units except the houses are single aspect which, combined with the block lay-out of the M-shaped block in the middle, result in several awkward dwelling lay-outs with impractical rooms, poor outlook, lack of balconies in an effort to prevent overlooking, and constrained day-light. An effort should be made to develop more generous dwelling lay-outs. Some units are single aspect in a northeast facing corner.

60 The crescent block, which is meant as a buffer block for noise from the elevated Jubilee Line, has single aspect flats facing the railway which results in poor quality dwellings.

Transport

61 The site has a public transport accessibility level (PTAL) of 3 where 6 is the highest. It is served by the Jubilee Line at Canons Park and by three key bus routes, which provide links to Edgware, Harrow-on-the-Hill and Brent Cross bus station.

62 The transport assessment has demonstrated that there is sufficient capacity on underground and bus services to support the identified trip generation.

63 TfL supports the revised scheme which has made significant improvements to the previous submission. The principal improvement is the provision of a secondary access into the site which provides improved access to Canons Park station and surrounding bus routes. The scheme also includes a high quality walking and cycling environment. TfL also supports the number of car parking spaces (0.88 per unit) and the number of cycle parking spaces (1 per unit) proposed which are in accordance with London Plan standards. The scheme also includes a car club and a travel plan to be managed by a travel plan co-ordinator.

64 TfL requires a minimum contribution of £100,000 towards public transport infrastructure. This will be used to fund enhancements to bus infrastructure to bring adjacent bus stops up to TfL's accessible bus stop design guidance, and towards preparation of a feasibility study to assess future works at the station. A further contribution may be required to ensure that signalised junctions serving the site are disability compliant, but this should be factored into the implemented scheme. The exact amounts payable will be agreed with the developers prior to planning permission being granted by the local authority.

Biodiversity

65 The application site is adjacent to two Sites of Borough Grade II Importance for Nature Conservation, the Edgware Brook on the western edge and the railway embankment to the east. No impacts are likely on the railway embankment.

66 The proposals include landscaped buffer strips beside the Edgware Brook and the railway embankment. These should ensure there is no adverse impact on the ecology of the adjacent sites. The landscape masterplan proposes planting with native species in these buffers. Subject to the detail of this, including the species used and, more importantly, the form of the planting, which should resemble natural habitats typical of the area, this could be a significant enhancement of the biodiversity of the site.

67 A lake is proposed in the south-west of the site, primarily as a sustainable urban drainage feature. It is proposed to landscape this with a sloping western edge, planted with emergent vegetation (such as reeds). Subject to the detail of the landscaping, this could be a significant enhancement for biodiversity. If reed is the dominant plant in the marginal planting, it could contribute to the London Biodiversity Partnership's target for the creation of new reed beds.

68 There is an opportunity for river restoration in the adjacent section of the Edgware Brook, which does not appear to have been taken. The brook in this section is in an artificial channel, allowing only limited opportunity for the establishment of marginal vegetation. There is a clear opportunity here for in-channel enhancements, or possibly more radical realignment of the brook into a more natural, meandering channel. This could potentially benefit flood management as well

as biodiversity. The applicants should explore opportunities for river enhancements or restoration with the Environment Agency.

69 Nevertheless, if the detailed landscaping of the lake and buffer strips is appropriate, it is likely that these areas would be added to the Site of Importance for Nature Conservation, resulting in a significant overall gain for biodiversity.

Access/equal opportunities

70 An access statement has been produced by the applicants. It states that the aim of the development is to provide an inclusive and accessible community facility. The statement advises that as the design is evolving, the access statement is only part of the process of creating an accessible environment. Further steps will include the production of a design and occupancy access statement and an accessibility strategy.

71 The applicants have advised that 100% of the units will be 'Lifetime Homes'. This is in accordance with the London Plan. 10% of the affordable accommodation is designed to be wheelchair accessible which is also in accordance with the London Plan. However, of the units for sale, only 2% are designed to be wheelchair accessible. This proportion should be increased to 10%.

Sustainable development

72 The applicants have submitted an energy statement to indicate that they will use energy efficient design measures beyond current building regulations to reduce CO2 emissions by 16%. They will incorporate a communal heating infrastructure to serve all flats and commercial buildings. The heating requirements will be met by a 150kWe combined heat and power plant with solar thermal panels providing heat in the summer. Overall savings will be 13.7%, with 10% renewable energy coming from the solar water heating. Although a larger combined heat and power system has been investigated with other renewable energy technologies, this approach is preferred by the applicants and is broadly consistent with the current London Plan. The communal wide heating infrastructure with CHP and renewables also supports the objectives of the emerging London Plan energy policies.

73 Additional sustainability measures include some use of dry construction, such as timber framing, prefabrication of building elements off-site and modular construction. The applicants have also advised that, wherever possible, natural materials from renewables and recycled sources will be specified.

London Development Agency's comments

74 This site is included as a Strategic Employment Location in the London Plan. Policies 2A.7 and 3B.5 of the London Plan seek to protect SELs as London's strategic reservoir of industrial land. The LDA normally opposes any loss in strategic employment land to other uses, particularly in those areas where the availability of employment sites is limited. However, it is noted that a proportion of the site has an extant permission for non-employment use, which leaves a small and constrained area of the site developable for industrial or employment uses.

75 Harrow development brief takes the extant permission on the site into consideration and as such has made provision for some housing to be provided on this site. It is therefore acknowledged that a mixed use development in this unique and exceptional circumstance could be warranted. Additionally, the LDA understands that Harrow Council is satisfied that the loss of the site for employment uses will not detrimentally affect the supply of industrial and employment land in the

borough now, and in the future, and that the proposed bic is meeting a local demand for this type of premises.

76 Although the LDA considers the jobs to homes ratio on the balance of the site to be disappointing, the LDA supports the inclusion of start-up and move-on floorspace for smaller/developing businesses. The intensive approach to the design of the employment component of the development is commendable, with the scheme securing an estimated 295 jobs within a small portion of the site.

77 The applicants have also indicated that they will be implementing initiatives to promote the bic, such as a 10% (below market) rent reduction and the flexibility to increase the BIC floorspace (through the provision of an additional floor) should the demand for such space exceed the provision. This is welcomed and the LDA recommends that Harrow Council secure monitoring arrangements within the Section 106 agreement so that the site's employment capacity can be maximised in the event of proven need. Additionally a firm commitment to produce a marketing strategy for the BIC should be provided prior to further referral to the Mayor to demonstrate how these units will be marketed to maximise their potential for success. Details regarding how these initiatives are to be arranged and managed should be formalised within the Section 106 agreement.

78 The LDA also has some concerns about the impact of the proposed scheme on the SEL to the south of the development site. The viability of industrial and business operations on surrounding and adjoining lands and the ability of the existing uses to continue operating is potentially at risk with the introduction of sensitive uses in such close proximity. The applicants have indicated that the location of the BIC and the 4-storey car parking facility along the southern boundary of the site will act as an appropriate buffer to these existing industrial uses to the south. Similarly, the layout of the proposed development includes an internal road between the BIC and residential apartments. All servicing and car parking areas are located at the rear (south) of the BIC away from the residential units and access to this rear area is along the western part of the internal road, which minimises the distance on business-related traffic on the internal road system. The LDA recommends that the Council assures itself that this will provide an adequate employment activity environment and that the Class B uses will not be unduly operationally restricted.

79 The Section 106 agreement should include provisions to enable local people to access the jobs created during construction, in the supply chain and in the commercial and retail components of the development once completed, as well as including measures to address other barriers to employment, including the childcare facility proposed.

80 In summary, the LDA does not normally accept the loss of any of London's strategic reservoir of industrial land but this is a unique site with exceptional circumstances and the LDA notes that Harrow is satisfied that the loss of employment land will not have an adverse affect on other industrial and employment land and that the proposed bic is addressing a specific local need. Local employment and training, the bic and measures to address barriers to employment should all be incorporated into a Section 106 agreement to maximise the benefits of the development to the local economy.

Local planning authority's position

81 It is understood that Harrow Council will be considering the application on 6 December 2006. The recommendation is unknown at present.

Legal considerations

82 Under the arrangements set out in article 3 of the Town and Country Planning (Mayor of London) Order 2000 the Mayor has an opportunity to make representations to Harrow Council at this stage. If the Council subsequently resolves to grant planning permission, it must allow the Mayor an opportunity to decide whether to direct it to refuse planning permission. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's comments unless specifically stated.

Financial considerations

83 There are no financial considerations at this stage.

Conclusion

84 Overall and on balance, the development provides a satisfactory response to the site's designation as a strategic employment location and there are sufficient circumstances to justify a departure from policy. These include the site constraints to major industrial use; the provision of marketing information that demonstrate that the site is generally regarded as being not particularly well established or recognised for industrial/ warehouse occupiers; and the provision of the business incubator centre which will provide significant employment.

85 The delivery of housing is welcomed. Affordable housing at 40% (by habitable rooms) has been justified by a Three Dragons model. The tenure is skewed towards intermediate accommodation which needs to be altered or further justified. The density is acceptable. The mix of units, which includes larger units, is welcomed.

86 The design of the proposal is broadly acceptable. An access statement has been produced. The scheme will produce 100% Lifetime Homes but the amount of wheelchair accessible housing needs to be increased to 10% within the private units.

87 The proposal is acceptable in transport terms subject to a contribution towards public transport infrastructure.

88 An on-site combined heat and power plant is proposed together with solar thermal panels. CO2 will be reduced by 16% which is welcomed.

89 The proposal is acceptable in relation to impact on biodiversity.

for further information, contact Planning Decisions Unit:

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Graham Jones
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Dear Graham,

I refer to your letter to the Mayor of 22 August 2006 asking for his comments on the planning application by Berkeley Urban Renaissance Ltd. and Dominion Housing Group Ltd. for the Honeypot Lane site, Stanmore. I wrote to you on 6 December 2006 setting out the Mayor's views on the application, and enclosed a copy of my report to the Mayor on the application (reference PDU/0827a/01). The Mayor expressed support for the application in strategic planning terms: "Overall and on balance, the development provides a satisfactory response to the site's designation as a strategic employment location and there are sufficient circumstances to justify a departure from policy". The Mayor had certain reservations, however, as set out in my letter, that he wished to see addressed in order to enable him to give it his full and unqualified support.

These 'stage 1' comments were provided on the assumption that negotiations would take place between the applicant and Harrow Council and between the applicant and the GLA to see whether the application could be amended to deal with the Mayor's detailed concerns, or to see whether any of his concerns could be dealt with by planning condition or section 106 agreement. Having looked again at my report to the Mayor and my letter to you, I am confident that such negotiations would have been successful and that, had Harrow Council decided to grant permission, the Mayor would not have directed refusal. (I state this without prejudice to any decision the Mayor might subsequently make.)

As the applicant appealed against non-determination on one of the twin-tracked applications, I need to see whether negotiations with the applicant can be brought to a successful conclusion so that when reporting the appeal to the Mayor, I can make a positive recommendation.

Direct telephone: 020 7983 4271 fax 020 7983 4706 Email: giles.dolphin@london.gov.uk

In reporting to your planning committee, therefore, you should not ascribe a negative view to the Mayor, but should indicate his overall support, and set out his reservations, and my expectation that they will be resolved before the public inquiry commences. It is unlikely that I will have concluded negotiations with the applicant this week – which I understand to be your report-writing deadline – but hope to have a result for you to report verbally or as a late addendum.

Yours sincerely,

Giles Dolphin
Head of Planning Decisions

cc Tony Pidgeley

table 4B.1 Density location and parking matrix (habitable rooms and dwellings per hectare)

Location	Accessibility Index	Setting	Car parking provision		
			High 2 – 1.5 spaces per unit	Moderate 1.5 – 1 space per unit	Low Less than 1 space per unit
			Predominant housing type		
			Detached and linked houses	Terraced houses & flats	Mostly flats
Sites within 10 mins walking distance of a town centre	6 to 4	Central			650 – 1100 hr/ha 240 – 435 u/ha Ave. 2.7hr/u
		Urban	200 – 450 hr/ha 55 – 175 u/ha Ave. 3.1hr/u	450 – 700 hr/h 165 – 275 u/ha Ave. 3.0hr/u	
		Suburban	200 – 300 hr/ha 50 – 110 u/ha Ave. 3.7hr/u	250 – 350 hr/ha 80 – 120 u/ha Ave. 3.0hr/u	
Sites along transport corridors & sites close to a town centre	3 to 2	Urban	200 – 300 hr/ha 50 – 110 u/ha Ave. 3.7hr/u	300 – 450 hr/ha 100 – 150 u/ha Ave. 3.0hr/u	
		Suburban	150 – 200 hr/ha 30 – 65 u/ha Ave. 4.4hr/u	200 – 250hr/ha 50 – 80 u/ha Ave. 3.8hr/u	
Currently remote sites	2 to 1	Suburban	150 – 200 hr/ha 30 – 50 u/ha Ave. 4.6hr/u		

source GLA

4.47 Appropriate density ranges are related to location, setting in terms of existing building form and massing, and the index of public transport accessibility (PTAL). Site setting can be defined as:

- Central – very dense development, large building footprints and buildings of four to six storeys and above, such as larger town centres all over London and much of central London.
- Urban – dense development, with a mix of different uses and buildings of three to four storeys, such as town centres, along main arterial routes and substantial parts of inner London.