

APPENDIX 2

Meeting:	Strategic Planning Advisory Panel
Date:	2 nd December 2004
Subject:	Land at Honeypot Lane –Development Brief
Responsible Officer:	Director of Strategic Planning
Contact Officer:	Phil Greenwood Tel: 0208 424 1090 Email: phil.greenwood@harrow.gov.uk
Portfolio Holder:	Portfolio Holder for Planning, Development, & Housing.
Key Decision:	No
Status:	Part 1

Section 1: Summary

Decision Required

To approve the Development Brief for land at Honeypot Lane, Stanmore

Reason for report

To advise the Panel of the response to public consultation and enable the Development Brief to be finalised.

Benefits

Approval of the Brief will improve service delivery by establishing a planning framework to guide the future use and development of the site that takes account of the views of relevant stakeholders, will assist the Council in considering future proposals, and help to facilitate the implementation of a key Proposal Site in the UDP.

Cost of Proposals

None

Risks

Delay in approving the Brief could weaken the Council's position in determining proposals for this key site and lead to unsatisfactory and piecemeal development.

Implications if recommendations rejected

Future proposals for the site would have to be considered against general UDP policies rather than site specific guidance.

Section 2: Report

2.1 Brief History

At its meeting on 7th June 2004, the then Unitary Development Plan Panel approved a draft Development Brief for land at Honeypot Lane (the former Government Offices site) for the purposes of public consultation. This took place over a 6 week period from 4th August to 17th September. This report considers the results of the consultation exercise, outlines the main areas of local concern and recommends a number of changes to the Brief. The revised brief, with additions highlighted, is included as Appendix 1.

2.2 The results of public consultation

Consultation on the brief generated a very limited response, generating only 9 replies. The lack of response, however, was almost certainly affected by the fact that statutory consultation on a planning application for large scale development on a substantial part of the site, received after the brief was approved for consultation, was conducted at much the same time. This has generated considerable interest with several hundred individual and circular letters of objection received. It is therefore likely that residents who might otherwise have commented on the brief chose to respond to the planning application instead. Although such comments relate to a specific form and scale of development they nevertheless highlight issues of general concern to the local community about the development potential of the site. Before finalising the brief, it would be prudent to consider whether it provides sufficient guidance on those particular matters.

The key issues highlighted in the course of public consultation were as follows:

Access

Several local businesses commented in writing or by telephone that the creation of a secondary access to the site from Parr Road, through existing parking/servicing areas, would have an adverse effect on their day to day operations.

The Office of Government Commerce (OGC) which represents the Government Civil Estate, owners of the 2.4ha northern part of the site, noted that maintenance of a single access to the site from Honeypot Lane had implications for the scale of development. Comments were also received about the adequacy of the Honeypot Lane access and the need for the brief to consider existing traffic conditions, black spots and congestion.

Comment:

Provision of a secondary access from Parr Road is only likely to arise if a significant amount of industrial/warehousing floorspace is proposed and shared access with residential use is considered unsatisfactory on amenity grounds. Any revised access arrangement would need to be negotiated between existing industrial occupiers and a future developer. It is suggested that this is clarified in the brief and, in addition, that the specific potential employment access points in Figure 3 are replaced by more generalised and diagrammatic access options.

The effect of development on the existing local infrastructure will be addressed in a transport impact assessment (TIA), the need for which is already included within the brief. Further guidance on the scope of the TIA, however, would be useful and suggested amendments are included in the revised brief covering this issue.

Employment Use

Comments were received from two businesses that the site should be retained for industrial/commercial use. A third business, occupying premises adjoining the site, advised of discussions to purchase land outside the borough to construct a 40,000 sq ft factory.

Agents acting for St Johns Homes, owners of the greater part of the vacant former Government office site, considered that it would be inappropriate to promote the site for a development comprising mainly B1, B2, B8 use as per Option 1 of para. 7.1.2 of the draft brief.

The OGC welcomed the objective of securing a mixed use development but felt that simply replicating existing and former numbers of employees may not create the optimum mixed use solution.

Comment:

The draft brief reflects the Proposal Site details, Policy EM14 of the 2004 HUDP, and the fact a significant proportion of the site has planning permission for residential use. Restricting the development options for the site as suggested would therefore be inconsistent with the UDP. It is accepted, however, that further guidance on how the employment objectives could be met would be helpful and suggested amendments are included in the revised brief.

Flood risk and environmental impact

The Environment Agency commented on a range of matters affecting flood risk, measures for the control of surface water drainage, the need for a buffer strip between any new building and the Edgware Brook, and advice about lighting, the protection of wildlife sites and appropriate forms of landscaping. In particular, the Agency advised that, based on work undertaken by consultants on behalf of the prospective developer of the site, the 1 in 100 year flood plain was more extensive than that shown in the brief and that the brief should be amended to reflect the more accurate boundary.

The OGC considered that the brief does not adequately justify the prevention of new building within the buffer strip adjacent to the Edgware Brook.

Comment:

Any development of the site would need to take account of Environment Agency requirements and advice on flood risk and surface water drainage. It is suggested that the brief be amended to highlight the need for prospective developers to consult with the agency on these matters. The extent of any buffer strip to the Edgware Brook, and restrictions on building within this area, reflects Environment Agency advice.

Density, layout, mix and type of accommodation, building height and affordable housing.

The Canons Park Residents' Association suggested that the brief should include a limitation on density, that there should be more houses and private amenity space, a limitation on height of no more than four storeys, and emphasis on the need to take local conditions into account in deciding the bulk, height and density of the proposals. Concerns about the scale and intensity of development and the appropriate height of new development were reflected in most of the objections to the planning application.

Agents for the OGC and St Johns Homes considered that the requirement for "at least" 50% of additional residential development, above existing commitments, to be affordable was excessive. In terms of site layout the OGC queried the adoption of an urban village approach which seeks to integrate employment and residential uses and felt that that the brief should acknowledge a distribution of land uses that could separate employment from residential. They also commented that the brief should acknowledge that a density of more than 50 dwellings per hectare will be acceptable on the site, and that it was unnecessary to specify separation distances between new development and existing properties fronting Whitchurch Lane.

St Johns Homes expressed concern about the level of provision required for dwellings to wheelchair standard and felt that the target mix for social rented housing was too prescriptive.

Comment:

The brief reflects the design led approach to development that has been adopted in the UDP, emphasising the need for development to have much closer regard to local site conditions than prescribed standards. In supplementing UDP policy it would therefore be inappropriate, and contrary to Government policy guidance, to introduce new material on matters such as maximum density, levels of amenity space or building height restrictions into the brief. It is accepted, however, that further guidance on the development potential of site, its surroundings and the context for development would be helpful, and this has been included in the revised brief.

With regard to the amount of affordable housing, the wording in the brief reflects both the UDP target that at least 50% of all new dwellings are affordable, and the exceptional circumstances necessary to justify residential development at this strategic employment location. It is acknowledged, however, that in negotiating the precise level and form of affordable housing, site development costs and economic viability will have to be taken into account, and that guidance to this effect should be included in the brief.

The proposed mix of social rented housing is clearly indicated in the brief to be a "target". It is considered that this provides sufficient flexibility and does not warrant

amendment. It is accepted, however, that the requirement for wheelchair standard housing should be amended to more accurately reflect UDP policy.

Comprehensive development and phasing

Both the OGC and St Johns Homes offered support for comprehensive development of the combined site. St Johns Homes commented that ownership issues dictate that this will have to be implemented in two phases, whilst the OGC were concerned to ensure that the development of the southern site does not compromise the development potential or mix on the northern site. They suggested that the brief should state that any planning application for one part of the site must demonstrate how co-ordination/integration between different parts of the site can be achieved through a masterplan approach.

Comment:

One of the fundamental objectives of the brief is to ensure that a comprehensive approach is taken to the development of the site which takes full account of identified constraints and land use opportunities. Developers bringing forward proposals for individual parts of the site will need to demonstrate how this objective can be met. The wording suggested by the OGC would be helpful addition to the brief in this regard.

Planning Obligations

St Johns Homes commented on the need for the Council to develop a clear and justified financial framework in order to lead negotiations with future applicants.

Comment:

It is accepted that the Council will need to have a clear justification for any planning obligations sought in relation to specific proposals for the site. It is unnecessary and premature, however, to include such detail in the brief.

2.3 Consultation

199 local residents were consulted about the brief, together with four residents associations, 27 business adjoining the site in Parr Road and Garland Road, the Mayor of London, Transport for London, the Environment Agency, Harrow in Business and the Harrow Chamber of Commerce (see Appendix 2). Consultation details were sent to Councillors in Canons, Belmont and Queensbury wards.

2.4 Financial Implications

None

2.5 Legal Implications

SPG is a non statutory guidance. Under the new system of Local Development Frameworks SPG is replaced by SPD which are subject to the provisions of regulations in part 5 of the Town and Country Planning (Local Development (England) Regulations 2004. There are transitional provisions for SPG.

This document would not be SPG or SPD as it was in draft when the relevant parts of the Planning & Compulsory Purchase Act 2004 (PACA) came into force and has not been prepared in accordance with the new regulations. The weight that an inspector would give it would be increased if it was seen to have a high level of consultation and thoroughness in considering the representations. The position of draft SPG's has not

been tested in relation to the PCPA 2004 and there is a degree of uncertainty about what status an inspector would give it.

2.6 Equalities Impact

The Development Brief provides the opportunity to promote an exemplar form of sustainable development that will enhance social inclusion and ensure full access to new housing, employment and community facilities.

Section 3: Supporting Information/ Background Documents

Appendix 1

Revised Development Brief

Appendix 2

List of Consultees

Background Papers

The Harrow Unitary Development Plan 2004

The London Plan

Report to Unitary Development Plan Advisory Panel June 2004

The owner/occupier	1-34 Bramble Close (cons)	Stanmore	Middx	HA7 1QX
Mrs F Lee	Bramble Close Residents Association	21 Bramble Close	Stanmore	HA7 1QX
The owner/occupier	268 -270 Whitchurch Lane 272A/B 274A/B 276 278A/B 280-286 290-298/298A 300-304 306A/B 308-312/312A 314-332/332A 334/334A/B	Stanmore	Middx	HA8 6QX
	287-313 Whitchurch Lane			HA8 6RA
	1-16 Bartholomew Court (cons) Longcrofte Road	Edgware		HA8 6QZ
The Manager	1-23 Station Parade (cons) Whitchurch Lane	Edgware		HA8 6RW
	1A – 9A Station Parade (cons\ 10A/B – 13A/B (cons) 14A – 23A (cons) Whitchurch Lane	Edgware		HA8 6RW
	1-6 Willow Court (cons) Bromefield	Stanmore		HA7 1AJ
The Manager	843/849 Honeypot Lane (I shop) 851 - 865 Honeypot Lane (odd) 897/899 Honeypot Lane (1shop) 901- 909 Honeypot Lane (odd)	Stanmore		HA7 1AR
The owner/occupier	869-895 Honeypot Lane (odds 877A Honeypot Lane Flat 1-4, 901 Honeypot Lane 911-915 Honeypot Lane	Stanmore		HA7 1AR
Mrs S Sackwild	Canons Park Residents Association	244 Whitchurch Lane	Edgware	HA8 QWH
Ms L M Chambers	Laing Estate Residents'	26 Bromefield	Stanmore	HA7 1AB

A J Raymond Association
Stanmore Society 8 Old Forge Stanmore HA7 3EB
Close

Metropolitan Police (1)Geoff Bigby (2) Insp. Barter
Mayor of London Ken Livingstone
Transport for London
Environment Agency Mr Deakin
Harrow in Business Mr Pluck
Chamber of Trade Mr Lalljee
Business uses in
Parr Rd